

MARIN GENERAL HOSPITAL REPLACEMENT BUILDING PROJECT

Response to Comments /
Final Environmental Impact Report
State Clearinghouse #2011092057

Prepared for
Marin Healthcare District

March 2013



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CHAPTER 1

Introduction

1.1 CEQA Process

An Environmental Impact Report (EIR) is an informational document prepared by a Lead Agency (in this case, the Marin Healthcare District, or “District”) that contains the environmental analysis for public review and for agency decision-makers to use in their consideration of a project. On August 31, 2012, the District released a Notice of Availability of the Draft EIR for the Marin General Hospital Replacement Building Project (“proposed project”) for public review and comment. The District also published the Notice of Availability in the *Marin Independent Journal* newspaper on September 6, 2012, as well as posted it with a viewable and downloadable portable document format (PDF) of the Draft EIR and its Appendices, on its website. The public review and comment period on the Draft EIR began on September 4, 2012 and ended at 5:00 p.m. October 22, 2012, which was three days beyond the date published in the Notice of Availability a period of 47 calendar days.¹

Concurrent with the Notice of Availability, the District issued a Notice of Public Meeting on the Draft EIR, which occurred October 11, 2012.²

1.2 Final EIR Context

This document, together with the Draft EIR and its Appendices, constitute the Final EIR for the project. Due to its large volume, the text of the Draft EIR is not included with this Response to Comments document; however, it is included by reference and is part of the Final EIR.³

The Marin Healthcare District, as Lead Agency, will make decisions on certification of this EIR, approval of a Mitigation Monitoring and Reporting Plan (MMRP), and approval of the project. The District will consider the Final EIR before approving or denying the proposed project. Before the District may approve the project, it must certify that the Final EIR adequately discloses the environmental effects of the proposed project, that the Final EIR has been completed in conformance with the California Environmental Quality Act (CEQA), and that the decision-making

¹ The District extended the public comment period, as it announced at the October 11, 2012 Public Meeting and on its website, primarily to account for the newspaper publication occurring on September 6 and to ensure ample time for public review and comment.

² On September 4, 2012, the District reissued the August 31, 2012-mailed Public Meeting Notice to revise the meeting location flyer enclosed therein to match the meeting date specified in the text of the Notice.

³ As titled, this document includes responses to public comments received on the Draft EIR - a key component of the Final EIR. However, this document is commonly referred to simply and collectively as the “Final EIR”.

body of the Lead Agency independently reviewed and considered the information contained in the Final EIR. Certification of the Final EIR would indicate the District's determination that the Final EIR adequately evaluates the environmental impacts that could be associated with the proposed project.

The District has prepared this document pursuant to CEQA Guidelines Section 15132 which specifies the following:

“The Final EIR shall consist of:

- (a) The Draft EIR or a revision of that draft.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in a summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The response of the Lead Agency to significant environmental points raised in review and consultation process.
- (e) Any other information added by the Lead Agency.”

This Final EIR includes these contents.

1.3 New Information in the Final EIR

If *significant new information* is added to an EIR after a notice of public review has been given (in this case, September 4, 2012), but before final certification of the EIR, the Lead Agency must issue a new notice and re-circulate the Draft EIR for further comments and consultation. None of the corrections or clarifications to the Draft EIR identified in this document constitutes *significant new information* pursuant to Section 15088.5 of the CEQA Guidelines.

Specifically, the new information, corrections or clarifications presented in this document do not disclose that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it; or
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines Section 15088.5)

Therefore, a Recirculation of the Draft EIR is not required. The information presented in the Draft EIR and this document support this determination by the District.

1.4 Organization of this Final EIR

Following this introductory chapter, this Final EIR is organized as described below.

- Chapter 2, *Project Clarifications and Additional Information*, provides additional project detail about the location and dimensions of the proposed new project buildings and related aesthetics considerations.
- Chapter 3, *Modifications to the Draft EIR*, contains supplemental information and modifications to the text and exhibits in the Draft EIR initiated by the Lead Agency or resulting from comments received on the Draft EIR.
- Chapter 4, *Commenters on the Draft EIR*, lists all agencies, organizations, and individuals that submitted written comments on the Draft EIR during the public review and comment period, and/or that commented at the Public Meeting on the Draft EIR.
- Chapter 5, *Responses to Written Comments Received on the Draft EIR*, contains each of the comment letters received on the Draft EIR and presents individual responses to the specific comments raised in each letter.
- Chapter 6, *Responses to Comments Received at the Public Meeting on the Draft EIR*, includes a transcript of the public comment period during the Public Meeting and presents responses to the specific comments received.

Appendices to this document follow Chapter 6.

CHAPTER 2

Project Clarifications and Additional Information

2.1 Introduction

The Marin General Hospital Replacement Building Project (“project”) remains as described in Chapter 2, Summary, and Chapter 3, Project Description, of the Draft EIR. There are no substantial changes to any component of the project or its implementation.¹

This section presents project clarifications and additional detail to that presented in the Draft EIR. This information primarily addresses proposed building heights and location characteristics, and also presents supplemental photos of the project site from specific viewpoints, and three additional computer-generated visual simulations illustrating “before” and “after” visual conditions. One of the visual simulations is prepared in response to a public comment received on the Draft EIR, as noted below. This section also discusses a modification to the projected number of new employees associated with the project.

To the extent that these project clarifications and additional detail pose potential environmental effects not previously disclosed in the Draft EIR, those potential effects are discussed. However, none of the information presented represents *significant new information*, gives rise to new or *more severe significant environmental impacts* not previously disclosed in the Draft EIR, or suggests a *new feasible project alternative or mitigation measure* that would lessen a significant impact, or indicate that its omission from the Draft EIR *prevented meaningful public review and comment* (see Section 1.3, *New Information in the Final EIR*, in Chapter 1, *Introduction*).

Also, as previously footnoted above, to the extent that any of this information changes text or exhibits that were presented the Draft EIR, these changes are also specified in Chapter 3, Changes to the Draft EIR.

¹ To the extent that any mitigation measures identified in the Draft EIR for the project are modified, those revisions are identified in Chapter 3, Changes to the Draft EIR, and/or identified and discussed in Chapter 5, Responses to Written Comments Received on the Draft EIR, and Chapter 6, Responses to Comments Received at the Public Meeting on the Draft EIR.

2.2 Project Heights and Setbacks

The following information and figures clarify details regarding the proposed height of each new building in the project and its setback from property lines. All measurements cited refer to actual building heights above existing ground levels; the figures also show heights calculated in relation to sea level.

The photo simulations in the Aesthetics section of the Draft EIR (Section 4.A) accurately portray the appearance of the project from various viewpoints. While some heights discussed below vary slightly from those described in the Draft EIR, the differences are not material, do not cause the simulations to understate the visibility or appearance of the project, and as stated above, do not alter the conclusions of the Draft EIR.

The proposed site plan of the project is shown in **Figure 2-1**, provided for the reviewer's orientation. (Figure 2-1 is the same as Draft EIR Figure 3-5.)

Hospital Replacement Building

The Hospital Replacement Building ("HRB") is proposed to contain five stories above ground and one below ground. Figures 3-12a and Figures 3-12b in the Draft EIR showed its measurements totaling 83 feet to the rooftop. The elevator and mechanical penthouses, which were depicted in the figures but without measurements, actually would rise another 16 feet above the rooftop. The parapets would rise 4 feet-3 inches above the rooftop. Thus the building as shown in the two Draft EIR figures portrayed heights of 87 feet-3 inches to the parapet and 99 feet to the penthouses.

The HRB site slopes in two directions, making it somewhat complicated to portray and describe its height. More detailed measurements have been calculated, using as a worst case the northwest corner facing Bon Air Road where the building will be the tallest (see **Figure 2-2**). The HRB as proposed would rise 88 feet-9 inches from the existing natural grade to the top of the rooftop parapet, and 100 feet-six inches to the top of the mechanical penthouse. The planned finished ground surface adjacent to the building at this point will be 2 feet-six inches higher than the existing grade, to conceal the basement wall and provide for landscaping. In considering views of the building, it is relevant to note that the mechanical penthouses will be located on the east side of the roof closest to the Central Wing and East Wing behind the hospital. Therefore the added height of the penthouses should not be as visible from viewpoints to the west looking up at the building (e.g., from Bon Air Road or Corte Madera Creek).

The Draft EIR provides simulations of the HRB from several viewpoints (Draft EIR Figure 4.A-6 from Bon Air Bridge, Draft EIR Figures 4.A-7 and 4.A-8 from Corte Madera Creek South Pathway, Draft EIR Figure 4.A-10 from Creekside Marsh). The simulations were based on 88 feet-9 inches to parapet and 100 feet-six inches to penthouse (the same heights cited above). Thus the simulations accurately portray the building height for purposes of CEQA analysis and public review.



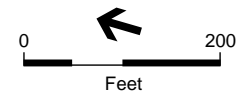
LEGEND

- BIKE PATH
- ACCESSIBLE PATH OF TRAVEL
- PROPERTY LINE
- ACCESS AND PARKING EASEMENT
- PROPOSED EASEMENT
- IMPACTED COUNTY LAND
- PROPOSED EQUIVALENT LAND AVAILABLE

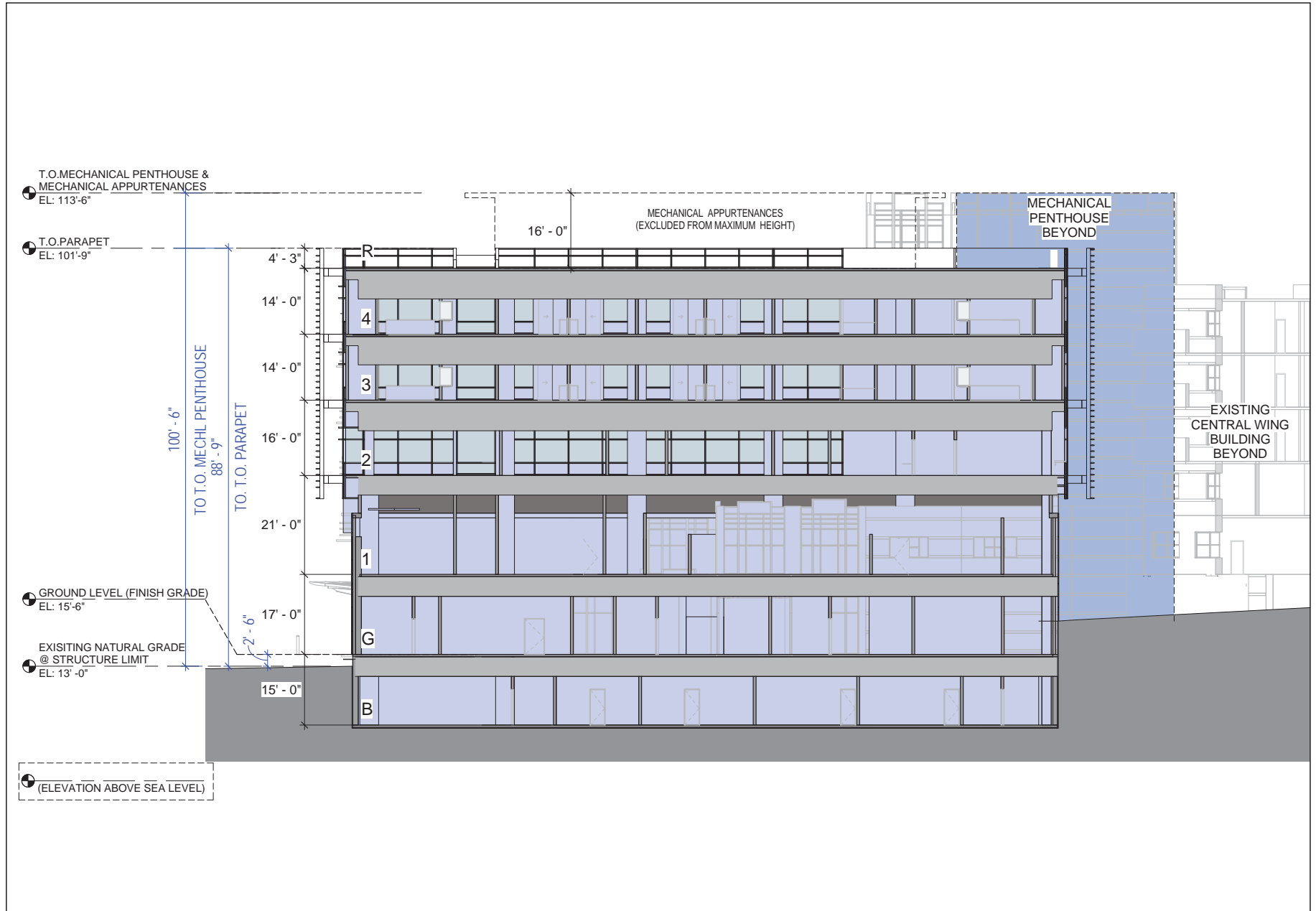
SITE BUILDINGS

- 1 EXISTING WEST WING
- 2A EXISTING CENTRAL WING
- 2B EXISTING EAST WING
- 3 EXISTING MENTAL HEALTH
- 4 EXISTING BULK OXYGEN
- 5 EXISTING INFORMATION TECH OFFICES
- 6 HOSPITAL REPLACEMENT 300,000 SF (5 LEVELS + BASEMENT)
- 7 AMBULATORY SERVICES BUILDING 100,000 SF (5 LEVELS)
- 8A PARKING STRUCTURE 507 SPACES (5 LEVELS)
- 8B HILL SITE PARKING STRUCTURE 412 SPACES (6 LEVELS)
- 9 UNDERGROUND GENERATORS
- 10 SUNKEN GARDEN

● Bus Stop - (N) New



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SOURCE: Lee Burkhardt, Liu, Inc.

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Figure 2-2
Hospital Replacement Building Cross-Section A-A'
(as shown in Figure 2-3)

The HRB façade runs roughly parallel with Bon Air Road and 80 feet-six inches from the roadway property line at its closest point (see **Figure 2-3**). The building will be 125 feet-six inches from the property line to the south at its closest point.

Ambulatory Services Building

The Ambulatory Services Building (“ASB”) is proposed to contain five stories above ground. The Draft EIR did not provide measurements of the building height. As shown in **Figure 2-4**, the ASB would rise 70 feet-six inches above existing grade to the top of the rooftop parapet, and 79 feet-six inches to the top of the mechanical penthouse.

The Draft EIR provides simulations of the ASB from several viewpoints (Draft EIR Figure 4.A-5 from Bon Air Road, Draft EIR Figure 4.A-9 from far end of Corte Madera Creek South Pathway, Draft EIR Figure 4.A-10 from Creekside Marsh, Draft EIR Figure 4.A-11 from Sir Francis Drake Boulevard, Draft EIR Figure 4.A-12 from Spyglass Hill, Draft EIR Figure 4.A-13 from Vista Grande). The simulations were based on a preliminary design of six floors instead of the actual five floors in the project, and therefore assumed a height of 91 feet (versus the actual height of 79 feet-six inches). Thus the simulations overstate the height of the building and its potential visual effects, making them sufficient for purposes of CEQA analysis and public review.

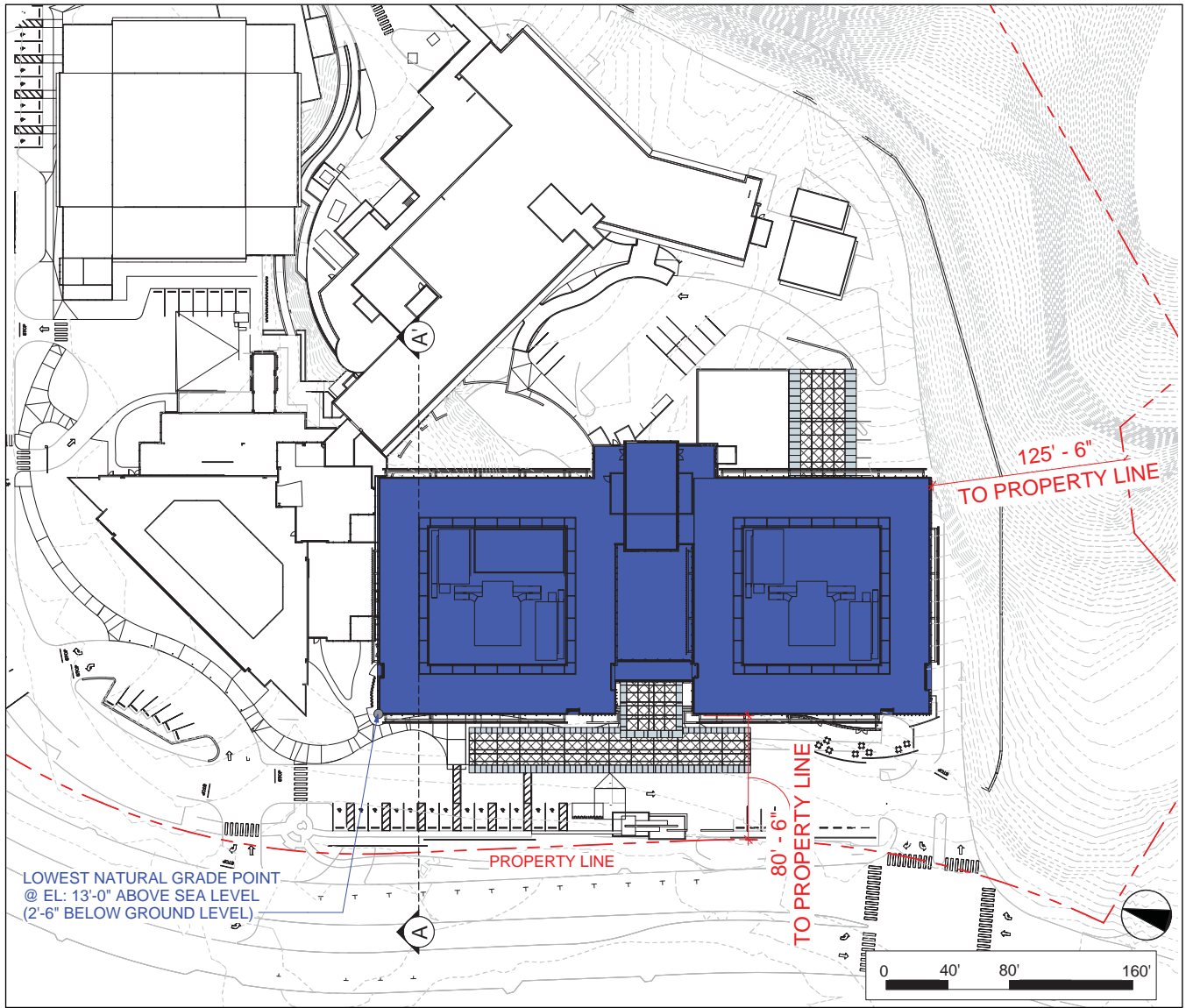
The ASB would be 233 feet-six inches from the District’s property line along Bon Air Road, with the Bon Air Road Parking Structure in between (see **Figure 2-5**). The eastern corner of the building would be 47 feet-10 inches from the property line between the District’s hospital property and the parcel jointly owned by the District and the County, near the Marin Community Mental Health Building.

Bon Air Road Parking Structure

The Bon Air Road Parking Structure is proposed to contain five stories of parking above ground. The top level will include lights on poles. The District has proposed that if funding becomes available it might install solar panels on a trellis system above the two center rows of parking on the top level. The Draft EIR stated that the structure would be 46 feet tall (Section 3.5.2 on page 3-18 in the Draft EIR); no figure showed an elevation with heights.

Figure 2-6 provides heights for each component of the Bon Air Road Parking Structure. The parking levels are on sloped ramps. The top of the parapet at either end are 48 feet-2 inches above existing grade, while a small portion of the parapet would rise to 53 feet-10 inches in the middle on the east side, facing the ASB. Maximum height to the two mechanical penthouses at either end is 64 feet. Light poles on the top parking level would rise 20 feet above the roof or a total of 69 feet-8 inches above grade at the tallest point. Finally, the optional solar panel trellises would rise 12 feet-six inches above the roof, 62 feet above grade at their tallest point.

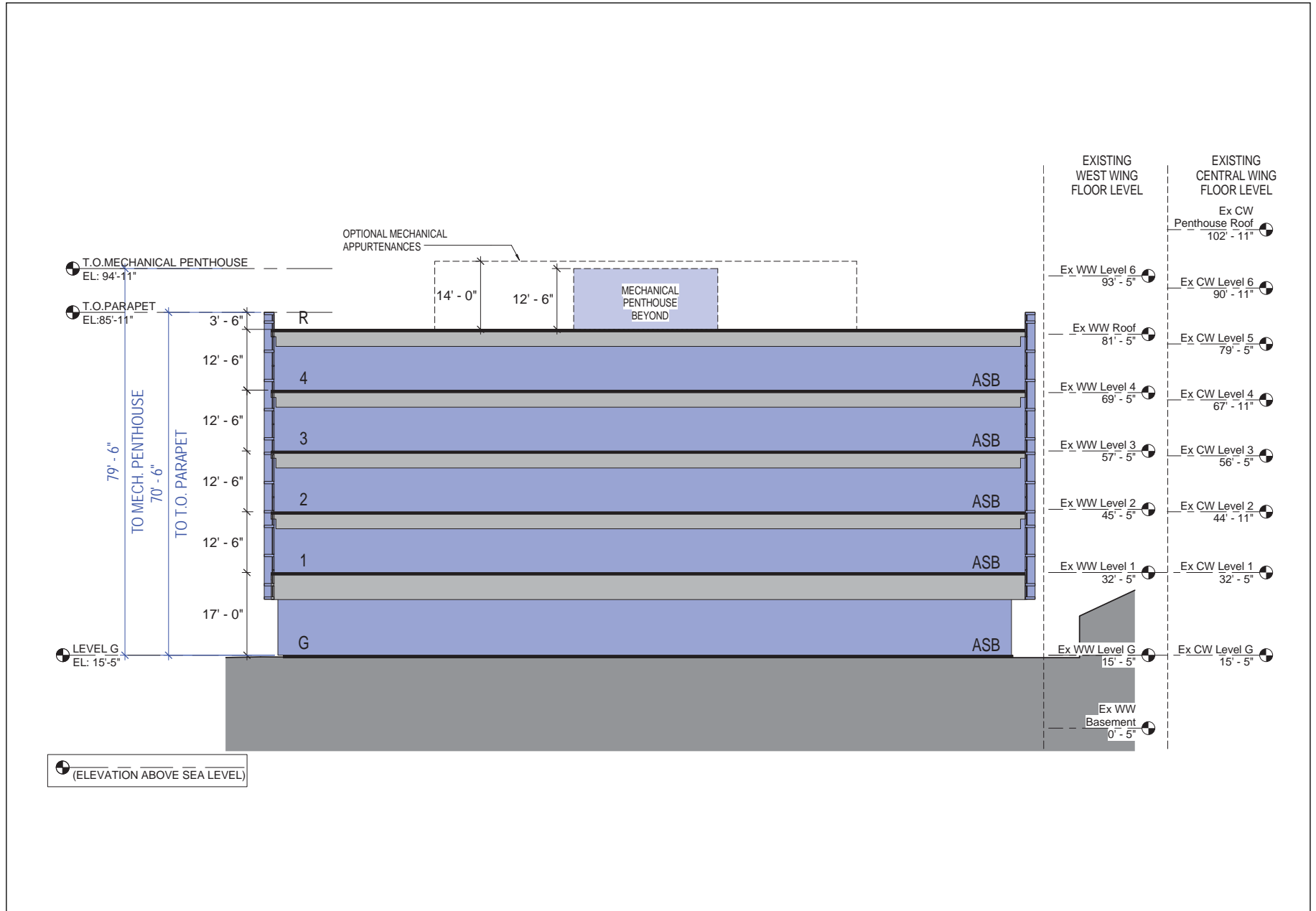
The Draft EIR shows simulations of the Bon Air Road Parking Structure from multiple viewpoints (Draft EIR Figure 4.A-5 from Bon Air Road, Draft EIR Figure 4.A-6 from Bon Air Bridge, Draft EIR Figure 4.A-8 from Corte Madera Creek South Pathway, Draft EIR Figure 4.A-9 from far end



SOURCE: Lee Burkhart, Liu, Inc.

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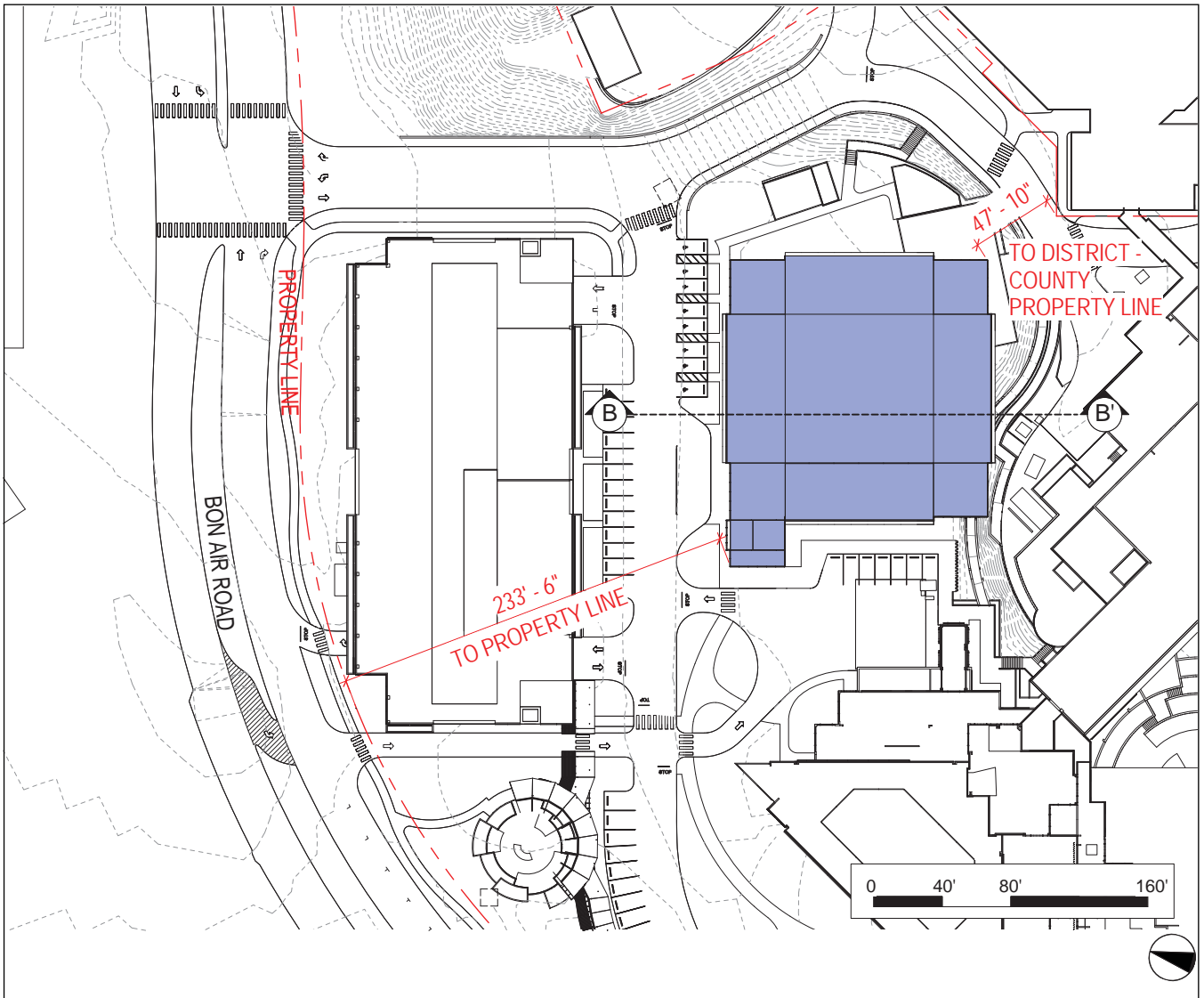
Figure 2-3
Hospital Replacement Building Site Plan



SOURCE: Lee Burkhardt, Liu, Inc.

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Figure 2-4
Ambulatory Services Building Cross-Section B-B'
(as shown in Figure 2-5)



SOURCE: Lee Burkhart, Liu, Inc.

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Figure 2-5
Ambulatory Services Building Site Plan

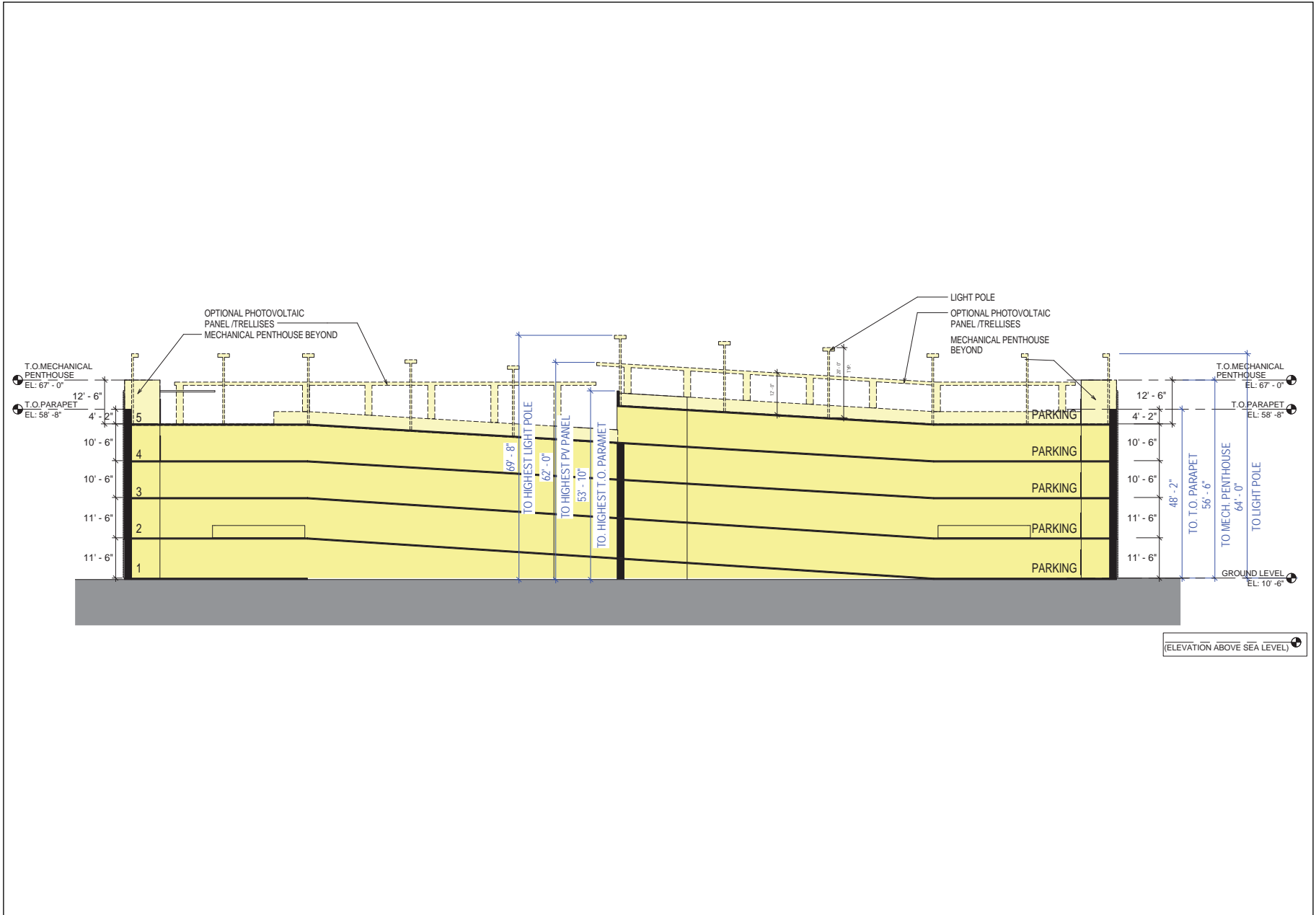


Figure 2-6
Bon Air Road Parking Structure Cross-Section C-C'
(as shown in Figure 2-7)

of Corte Madera Creek South Pathway, Draft EIR Figure 4.A-11 from Sir Francis Drake Boulevard, Draft EIR Figure 4.A-12 from Spyglass Hill, Draft EIR Figure 4.A-13 from Vista Grande). The simulations were based on a total height of 55 feet-six inches to the penthouse and 60 feet-six inches to the solar panels (See Figure 4.A-13 looking down at roof and showing the solar panels). This is only 1 foot to 1 foot-six inches shorter than the actual plan, which would not result in a measurably different appearance when viewed from across the street or from a longer distance.

It is relevant to note that the solar panel trellises would only be installed along the two center parking strips away from the edge of the building, reducing their visibility from ground-level viewpoints looking up at the structure. The added height of light poles would not materially affect daytime views given their slender shape.

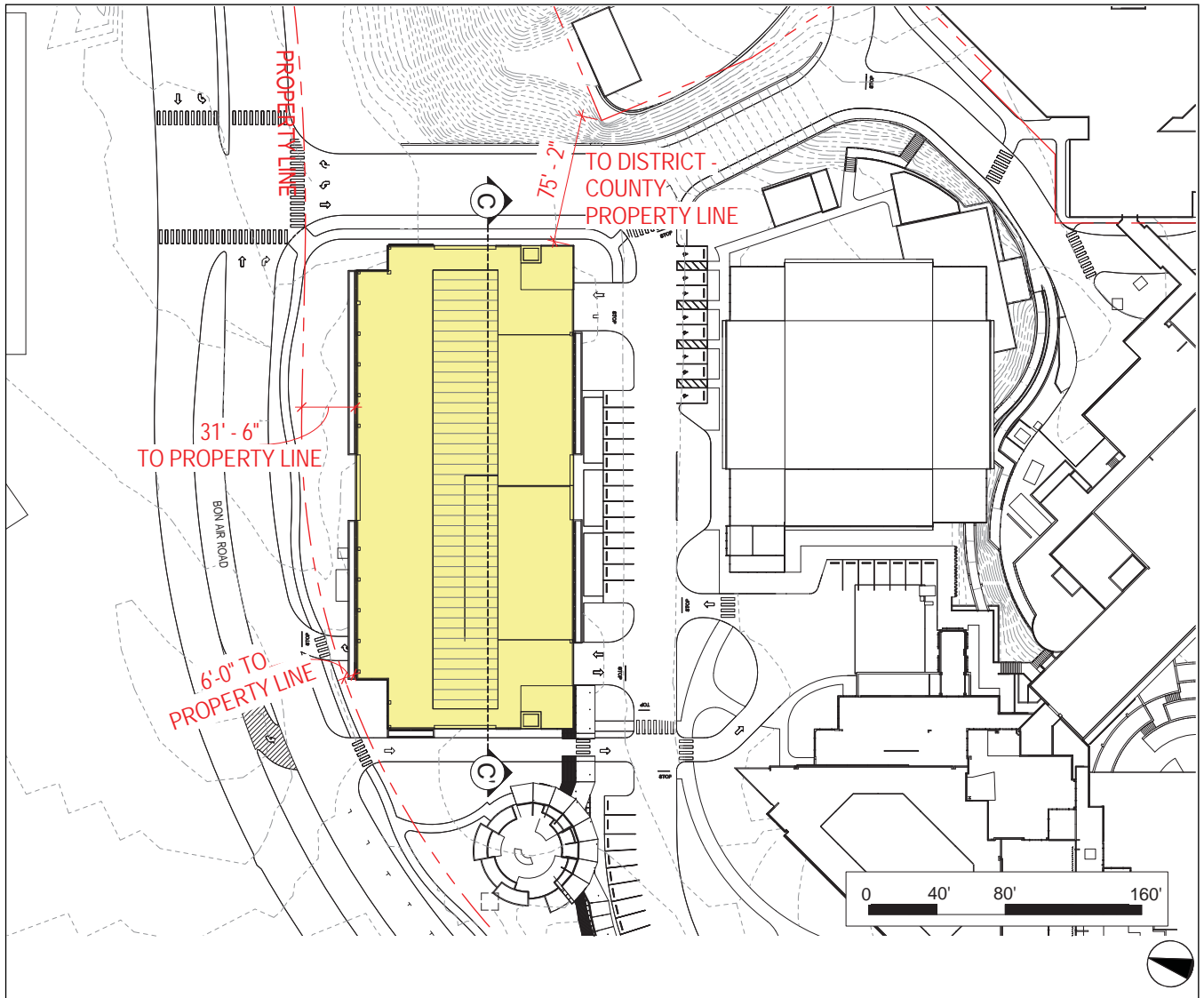
The Bon Air Road Parking Structure fronts on the roadway. Setback to the property line would be 31 feet-six inches for most of the structure frontage, narrowing to six feet at the western corner where the road curves south (see **Figure 2-7**). The eastern corner of the building would be 75 feet-2 inches from the property line north of the northern access driveway between the District's hospital property and the parcel jointly owned by the District and the County.

Hillside Parking Structure

The Hillside Parking Structure is proposed to contain six stories of parking above ground. The top level will include lights on poles. The District has proposed that if funding becomes available it might install solar panels on a trellis system above the two center rows of parking on the top level. The Draft EIR stated that the structure would be 57 feet tall (Section 3.5.2 on page 3-17 of the Draft EIR); no figure showed an elevation with heights.

Figure 2-8 provides heights for each component of the Hillside Parking Structure. The parking levels are on sloped ramps. The District proposes excavating to create a building pad, with the rear of the structure against the hillside. The top of the parapet at the southwest end of the building (nearest the Community Mental Health Building) is 61 feet-8 inches above existing grade. One section of parapet would be one foot higher, facing north at the top of partial Level 6. Maximum height to the top of the two mechanical penthouses at the southwest end is 70 feet.

Light poles on the top parking level would rise 20 feet above the roof or a total of 78 feet-7 inches above grade at the tallest point, if the optional solar panel trellises are not developed as part of the project. The optional solar panel trellises would rise 12 feet-six inches above the roof, 70 feet above grade at their tallest point – the same height as the penthouses. If the solar panel trellises are incorporated into the project (even after the parking structure is already built), light poles on the rooftop parking level would only rise 10 feet above the roof (instead of 20 feet) and would only be located in the area surrounding the center trellises to supplement the primary lighting that would be mounted directly to the trellises. The added height of light poles would not materially affect daytime views given their slender shape (Lighting effects are discussed under *Discussion of Simulations and Photos*, below.)



SOURCE: Lee Burkhardt, Liu, Inc.

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Figure 2-7
Bon Air Road Parking Structure Site Plan

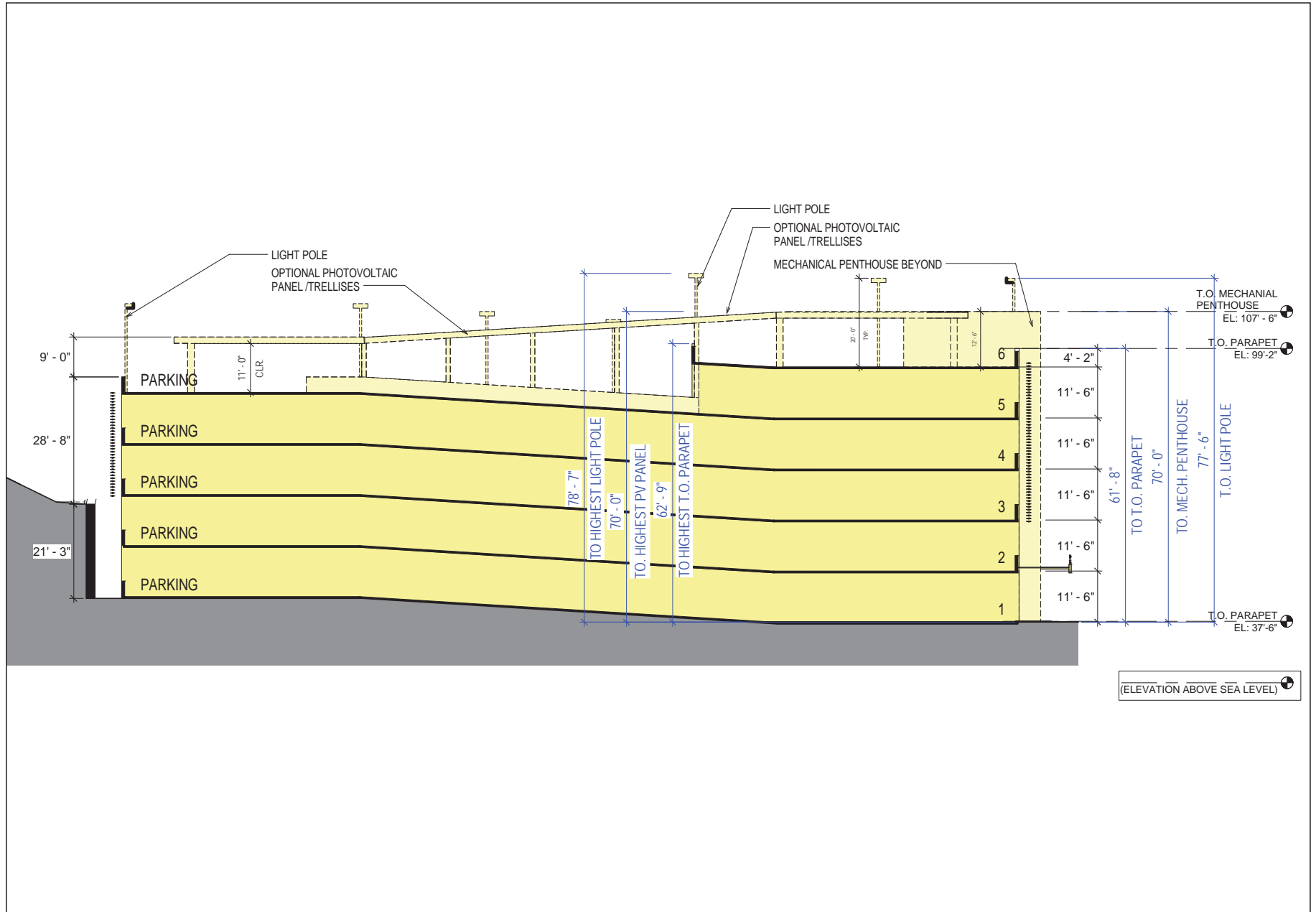


Figure 2-8
Hillside Parking Structure Cross-Section D-D'
(as shown in Figure 2-9)

The Draft EIR provides two simulations showing the Hillside Parking Structure (Draft EIR Figure 4.A-9 from the far end of Corte Madera Creek South Pathway, Draft EIR Figure 4.A-13 from Vista Grande). The simulations were based on a total height of 70 feet, the same as the actual planned height. The simulations included solar panels (see Draft EIR Figure 4.A-13 looking down at the structure roof).

It is relevant to note that the solar panel trellises would only be installed along the two center parking strips away from the edge of the building, reducing their visibility from ground-level viewpoints looking up at the structure. A hill between the parking structure and Bon Air Road will screen views of the structure from the west and northwest.

The simulation in Draft EIR Figure 4.A-12 shows views from the roadway in the Spyglass Hill neighborhood looking down to the ASB and Bon Air Road Parking Structure. The Draft EIR states that the photograph used for this simulation “captures the steep and heavily landscaped topography on the east area of the project site, which allows the proposed Hillside Parking

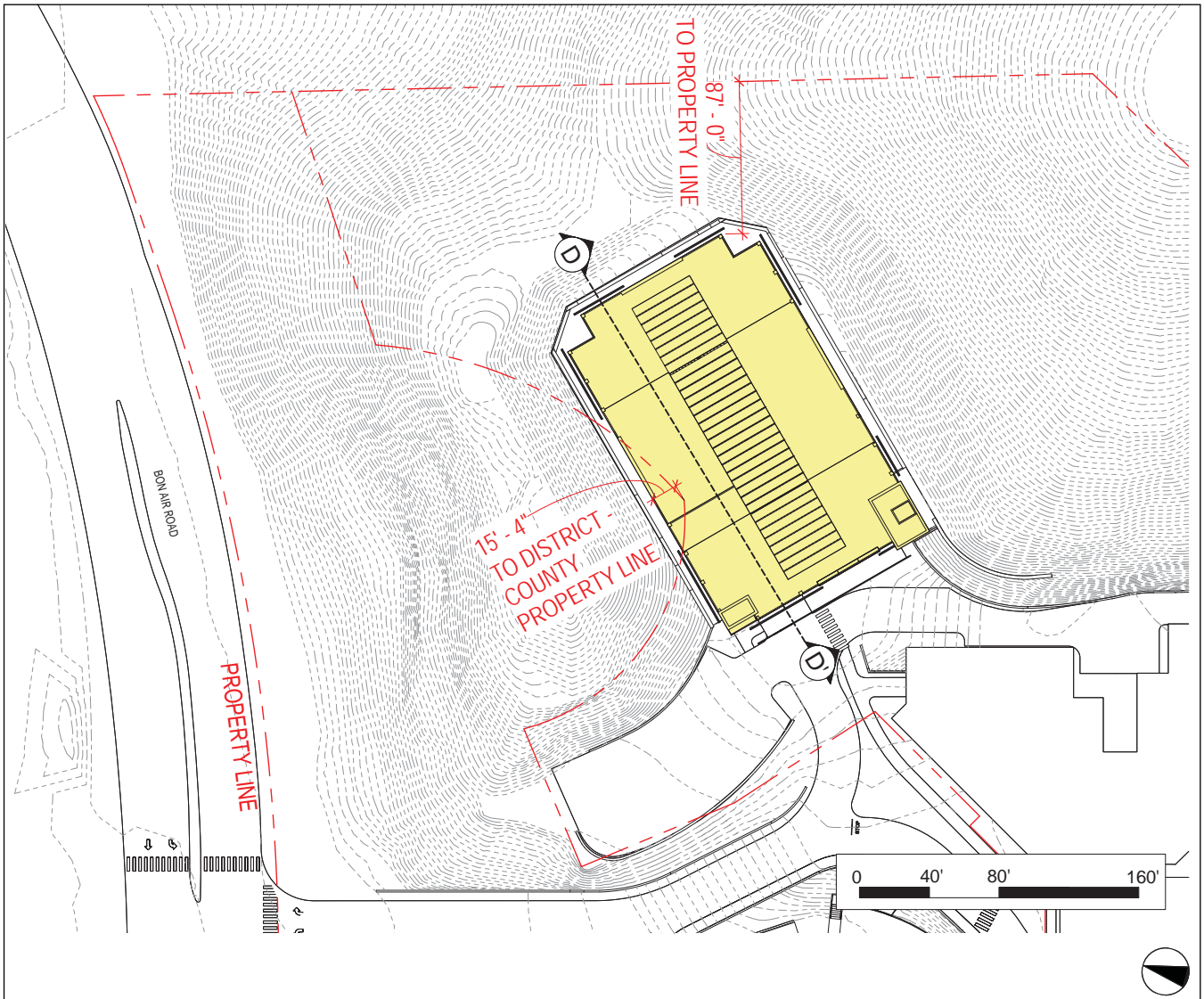
Structure to be largely screened from hilltop viewpoints by the natural terrain” (see Draft EIR page 4.A-26). However, the Hillside Parking Structure site did not appear in Draft EIR Figure 4.A-12 because the direction of view was turned more towards the ASB and Bon Air Road Parking Structure.

Figure 2-9 shows the location of the Hillside Parking Structure in relation to property lines. The parking structure site straddles the property line between the District’s hospital property and the parcel jointly owned by the District and the County. As discussed in the Draft EIR (initially at Chapter 1), the parties are considering possible arrangements such as a land swap or a ground lease to allow the District to use the jointly-owned parcel for the structure – which may include a lot line adjustment so the entire structure can sit on one parcel. The eastern corner of the structure would be 87 feet from the property line between the District-County parcel and the Via Hidalgo residential development at the top of the hill.

2.3 Additional Visual Simulations and Site Photos

Comments M-1 and H-11 (see Chapter 5 of this Final EIR) received on the Draft EIR during the comment and review period specifically asked that simulations be prepared of the Hillside Parking Structure as viewed from Spyglass Hill. The Draft EIR had concluded that the structure would be screened by terrain and vegetation, so no additional simulation was required to that provided in Draft EIR Figure 4.A-12 from the Spyglass Hill Area. However, in response to the comments additional photography and simulation work was conducted focused on this relationship.

Although the District prepared one of simulations in direct response to a public comment received on the Draft EIR, the simulation and its assessment is conducted in this section which discusses a range of revisions and new information related to the physical characteristics of the project. A brief response to Comment M-1 is provided in Chapter 6 and referenced to this section.



SOURCE: Lee Burkhardt, Liu, Inc.

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Figure 2-9
Hillside Parking Structure Site Plan

Approach

As was done to develop the simulations presented in the Draft EIR (as described starting on Draft EIR page 4.A-10), a series of candidate photos of potential visual simulation viewpoints was selected. The potential viewpoints were selected through the District's collaboration with visual resources professionals, a representative from Spyglass Hill (the Comment M-1 commenter), and the property manager of the Via Hidalgo complex. The three viewpoints that ultimately were selected for simulation represent what is reasonably considered the worst-case of how the Hillside Parking Structure could affect existing views of scenic resources described in the Draft EIR from these hillside residential areas west and northwest of the project site. Primary consideration was given to whether a potential viewpoint captured one or more scenic resources, and whether the viewpoint can be, and is routinely, accessed by the general public and observed by a large number of people (see discussion of both topics below). The selected viewpoint locations are shown in **Figure 2-10**.

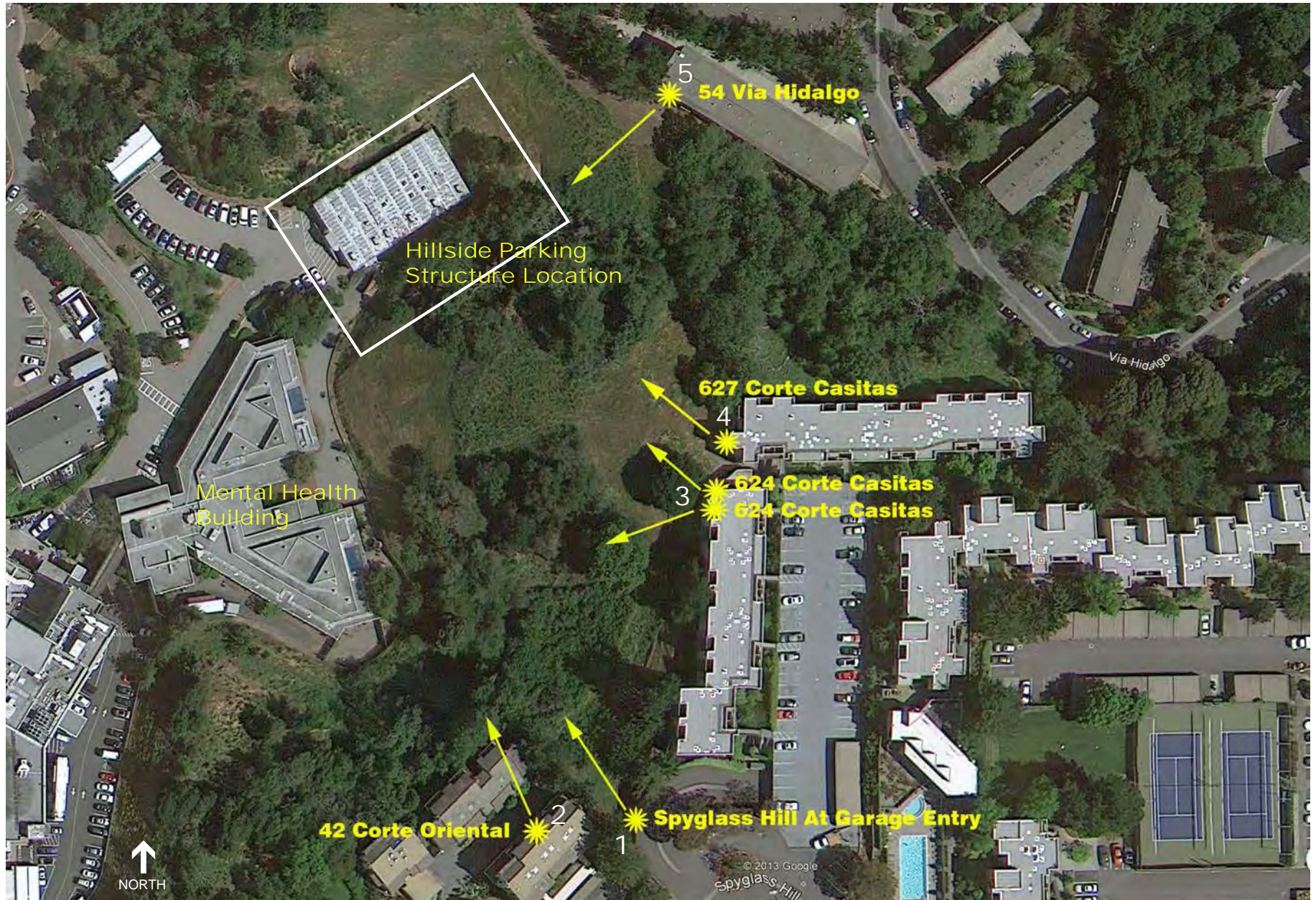
The assessment of potential viewpoints involved story poles professionally installed on the project site to represent the four corners of the proposed structure. Key height measure points (such as top of parapet, elevator penthouse, and other potential appurtenances) were demarcated on each story pole with a flag. This work was done by California Story Poles (contractor) under the direction of the project architect and engineers and visual resources professionals. Two of the selected viewpoints (Viewpoints 3 and 4) represent candidate photos with story poles that were not selected for simulation but are included here because they provide information about the broader view context experienced in these areas.

Scenic Resources

The most significant scenic vistas and scenic resources visible from public viewpoints in the vicinity of the project site are described on Draft EIR page 4.A-8 and captured in the simulations and photos presented in this Final EIR. Relevant to this assessment of views from Spyglass Hill as well as Via Hidalgo are (1) views of distant hillsides and ridgelines to the north, west and south of the project site (which are captured in each of the selected viewpoints); and (2) limited views of Creekside Marsh and Corte Madera Creek to the west and southwest (which are captured in Viewpoints 3 and 4).

Public and Private Views

In practice, the assessment of aesthetics under CEQA generally focuses on adverse effects that would be experienced or be visible to the general public, especially in large numbers. This typically considers views from locations that are public open space areas, designated public trails/paths, designated viewing areas available to the public, as well as heavily traveled roadways or waterways. This focus on the public realm is consistent with the general purposes of CEQA, as it is carried out through the significance criteria from the CEQA Guidelines, through County of Marin CEQA Guidelines, in CEQA caselaw, and in various aesthetics-related policies that apply to the project and that are cited starting on Draft EIR page 4.A-9. (See more in-depth discussion



SOURCE: Visual Impact Analysis LLC, 2013

Marin General Hospital . 210606
Figure 2-10
Supplemental Viewpoint Map

of CEQA caselaw on this topic in the end *Summary* of this chapter.) Conservatively, the Draft EIR incorporated policies from neighboring Kentfield and Larkspur, since many aesthetics factors and important visual resources cross jurisdictional boundaries.

These considerations do not preclude the reasonable assessment of potential effects viewed from private property (individual dwelling units, in particular) in a CEQA analysis when the effect could be substantial and far-reaching. While the assessment below recognizes notable changes would likely occur to a few private views, these do not outweigh or contribute largely to the potential effects from viewpoints located in the public realm.

The Draft EIR included simulations from viewpoints selected because they would be representative of multiple private home views from these higher elevations (Draft EIR Figure 4.A-12 from Spyglass Hill, Draft EIR Figure 4.A-13 from Vista Grande). Public locations from which to view the project site and the Hillside Parking Structure from the Spyglass Hill and Via Hidalgo areas are limited to common driveways and parking garage access ramps. One of the simulations provided is from the circular driveway ramp at the Spyglass Hill parking garage.

Discussion of Simulations and Photos

Viewpoint 1 – Simulation from Spyglass Hill Driveway Ramp

Figure 2-11 shows the existing “before” photo and “after” simulation of a view looking west from the circular driveway ramp from lower level of the Spyglass Hill parking garage. This is considered a publically-accessible viewpoint and was selected primarily for that reason, as it is one of the few in the Spyglass Hill area from which the public might observe the project site, and specifically the Hillside Parking Structure, on a regular basis. This is also a view that looks slightly to the right (north) of the simulation showed in Draft EIR Figure 4.A-12 and therefore captures portions of the Hillside Parking Structure not captured in the Draft EIR simulation. Like the viewpoint from which the Draft EIR simulation was taken, Viewpoint 1 still takes in the background that is the northern hillsides and ridge and the Marin Catholic High School and football field. The midground captures vegetation that exists on the hillside, up from the project site.

The simulation in Figure 2-11 shows that the upper stories and top deck of the Hillside Parking Structure and its appurtenances will be visible from this location, replacing the area of grass and vegetation that exists just beyond the existing Spyglass Hill residential buildings further northwest (and downhill) from Viewpoint 2. As discussed in the Draft EIR for the adjacent view simulated in Figure 4.A-12, the Hillside Parking Structures would not block views of the wooded hillsides or the ridgeline in the distance. No other project buildings would be visible in this view.

Viewpoint 2 – Simulation from Spyglass Hill, 42 Corte Oriental

Figure 2-12 shows the existing “before” photo and “after” simulation of a view looking west from a private window/deck of a Spyglass Hill dwelling unit. This is essentially the same view as Viewpoint 1, and was selected for simulation in addition because it is located closer to the project site than Viewpoint 1. This is also the view that looks slightly to the right (north) of the simulation



Existing



Simulation



Simulation with 10-year Landscaping

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Existing



Simulation

showed in Draft EIR Figure 4.A-12 and therefore captures portions of the Hillside Parking Structure not captured in the Draft EIR simulation. Like the viewpoint from which the Draft EIR simulation was taken and Viewpoint 1, Viewpoint 2 still takes in the background that is the northern hillsides and ridge and the Marin Catholic High School and football fields. The midground captures an area of grass and vegetation that exists on the western hillside, up from the project site.

The simulation in Figure 2-12 shows that the upper stories and top deck of the Hillside Parking Structure and its appurtenances will be visible from this location, replacing the area of grass and vegetation that exists just beyond the existing Spyglass Hill residential buildings further northwest (and downhill) from Viewpoint 2. As discussed in the Draft EIR for the adjacent view simulated in Figure 4.A-12, the Hillside Parking Structures would not block views of the wooded hillsides or the ridgeline in the distance. No other project buildings would be visible in this view.

Lighting and Glare

The Draft EIR on page 4.A-31 acknowledges that those most potentially affected by the increase in light and glare from the new parking structures would be the uphill residents to the north of the site and the residents on Spyglass Hill. The simulation from Viewpoint 2 in Figure 2-12 shows the visibility of the rooftop parking from close-in units east of the structure. It also illustrates that direct light and glare from vehicle headlights would not have an effect on adjacent residential units given the relatively lower elevation of the rooftop parking level.

The Draft EIR identifies in the second full paragraph on page 4.A-31 specific design and operational elements that the project would employ to avoid adversely affecting nighttime views in the area. That paragraph is replaced with the following (as also indicated in Chapter 3 [Changes to the Draft EIR] of this Final EIR):

The project will incorporate the following several design and operational approaches to avoid adverse nighttime views:

- a) The Hillside Parking Structure is “pushed” into the hillside, which helps reduce noise impact and lighting effects (as well as scale and visual effects). (*Hillside Parking Structure Only*)
- b) The exterior openings are open enough to allow for natural ventilation of the structure but are also above the hood of most vehicles and therefore block headlight leakage out of the structure. (*Both Parking Structures*)
- c) New landscaping would be located to maximize the screening of the parking structure facades, primarily to shield potential light “spillage” from the side of the parking structure as well as from the rooftops (from headlights or garage lighting). In particular, an “oak woodland” palette of trees is indicated in the concept landscape plans to augment the existing hillside trees that will remain. New landscaping would be planted as high up on the slope and as close to the property line (along the crest of the hill, at elevations 85 to 100 feet [compared to elevations 60 to 65 at the top of the rear and side retaining walls of the parking structure]), to provide effective screening between the residential areas to the northeast/southeast (i.e., Via Hidalgo and Spyglass Hill/Corte Casitas). (The expanded landscape plans are shown in Figure 3-14R and Figure 4.C-2R in Chapter 3 [Changes to the Draft EIR]).

- d) The project would restrict access to the rooftop parking level of the Hillside Parking Structure to new parkers (which would primarily be staff) during nighttime hours (after dusk and until dawn, year round). This would substantially reduce the potential for adverse nighttime views due to light and glare. In winter it gets dark earlier (near 5:00 p.m.) and stays dark later (near 7:30 a.m.), so rooftop lights and automobile headlights would be on in early evenings and early mornings as workers leave or arrive, but this would not be considered a nuisance to nearby residents at those hours.
- e) Rooftop parking lighting during nighttime hours would be limited to that necessary to ensure safety and to meet all code requirements and professional standards. This restriction for the Hillside Parking Structure would be implemented in tandem with an automatic motion sensor system that would trigger the rooftop parking light fixtures into use only as needed during nighttime hours (after dusk and until dawn, year round). In winter it gets dark earlier (near 5:00 p.m.) and stays dark later (near 7:30 a.m.), so the reduced rooftop lighting would be on in early evenings and early mornings, but this would not be considered a nuisance to nearby residents at those hours. *(Hillside Parking Structure Only)*
- f) All rooftop parking light fixtures would be pole-mounted (excepted as specified with the optional solar panel trellis) and shielded and cast downwards. Plans for the parking structures conservatively assume light poles that are 20 feet above the roof if the optional solar panel trellises are not developed. *(Both Parking Structures)*
- g) If the optional solar panel trellises are developed on the Hillside Parking Structure, all of the 20-foot-tall light poles will be removed and replaced with an appropriate number of 10-foot-tall light poles, except in the center area where the solar panel trellis would be installed (as shown in Final EIR Figures 2-8, 2-9, 2-11, 2-12 and 2-15). The number and rooftop location of the replacement 10-foot light poles shall determined by a qualified professional lighting engineering to confirm no overall increase in lighting levels. *(Hillside Parking Structure Only)*
- h) If the optional solar panel trellises are developed, lighting mounted directly on the trellis and appropriately shielded and cast downwards to a point below the light bulb and reflector will provide the primary rooftop parking lighting and be supplemented by the shorter 10-foot light poles. *(Hillside Parking Structure Only)*
- i) All light fixtures inside parking structures (below the rooftop parking level) would be ceiling mounted and cast downwards to a point below the light bulb and reflector to not cast direct light or glare above horizontal. *(Both Parking Structures)*
- j) All new exterior lighting (all parking levels) would be shielded and cast downwards to a point below the light bulb and reflector to not direct light or glare above horizontal. *(Both Parking Structures)*

² Of the total 412 parking spaces in the Hillside Parking Structure, 40 spaces are on the rooftop (as shown on Draft EIR Figure 3-9). The project would introduce to the campus approximately 443 new employees (as modified below in Final EIR Section 2.5): slightly more than two-thirds (286) associated with the new Ambulatory Services Building and the other one-third (157) being hospital nursing staff (see Table 3-1R in the Final EIR). It is unlikely that all 443 new staff would have the same work shift, or have shifts that start or end during nighttime hours. Therefore, it is reasonable that the Hillside Parking Structure, as well as campus-wide parking, could accommodate the temporary restriction of 40 rooftop parking spaces from dusk to dawn to avoid potential adverse views due to lighting and glare.

This discussion does not change the less-than-significant conclusion in the Draft EIR that the project would not create a significant increase in light and glare which could adversely affect nighttime views in the area or cause potential “spillage” of lighting that may affect nearby residents. The project will incorporate the above design and operational elements which, given the relative distance and elevation between the hillside residents and the Hillside Parking Structure in particular, will avoid a significant impact. These project components may be considered during the County of Marin’s Design Review of the project.

Viewpoint 3 – Photo from Spyglass Hill, 624 Corte Casitas

Figure 2-13 shows a composite view looking west from a private window/deck of a Spyglass Hill dwelling unit located in the next residential building north about 250 feet from Viewpoint 2. The two photos show the substantial tree blockage of the existing project site from this viewpoint that captures a north and northwest expanse. The story poles demarcating the Hillside Parking Structure were erected when this photo was taken (they show in Viewpoint 4). This photo demonstrates that the Hillside Parking Structure specifically would not be visible from this viewpoint. Although portions of the proposed ASB, HRB, and Bon Air Road Parking Structure will be visible from this viewpoint, extrapolating from the proposed site plan (Figure 2-1), relative grade changes, and Draft EIR Figure 4.A-12, it is reasonable to project that views of the Creekside Marsh and Corte Madera Creek would not be substantially obscured, nor would existing views to the north-northwest hillsides and ridgeline be adversely affected. Moreover, the heavy tree cover shown at this elevation in Viewpoint 3 would not be removed for the project.

Viewpoint 4 – Photo from Spyglass Hill, 627 Corte Casitas

Figure 2-14 shows another view from the Spyglass Hill area, specifically from a private window/deck of a Spyglass Hill dwelling unit (same building as Viewpoint 3) that is located closest to the proposed Hillside Parking Structure. The erected story poles are visible in this photo: the topmost flag represents the top of the light fixture, with the next lower flag marking top of the mechanical penthouse and solar panel trellis, and the bottom flag marking the top of the garage parapet. The two story poles that are visible in the photo mark the north (right) and south (left) edges of the structure, which will not result in obscuring the north-northwest hillsides and ridgeline, nor any portion of the Creekside Marsh, which appears in the midground to the left of the photo.

Viewpoint 5 – Simulation from 54 Via Hidalgo

Figure 2-15 shows the existing “before” photo and “after” simulation of a view looking southwest from a private window of an upper-level Via Hidalgo dwelling unit that is located closest to the proposed Hillside Parking Structure. Viewpoint 5 encompasses the southern hillsides and ridgeline in the background. The midground is dominated by the existing hospital, and the hospital’s existing surface parking lot and a small area of Corte Madera Creek is visible to the west (right side of the photo). The foreground of the existing view is the thinned and varied vegetation on the steep down-sloping hillside toward the project site to the southwest, from Via Hidalgo. Several attempts were made by consultants gain access to other private units within Via Hidalgo, but no tenants were available. However, a review of several proxy photographs taken from the hillside to the south of







Existing



Simulation

the residential units along 51-54 Via Hidalgo confirmed that Viewpoint 4 is fairly representative of the existing views and the resulting effects with the project.

Figure 2-15 shows that the upper stories and top parking deck of the Hillside Parking Structure will be prominent from this view; the structure will be located approximately 200 feet from Viewpoint 5 at its closest point and will replace the entire existing midground view (the existing hospital, surface parking lot, and the small segment of Corte Madera Creek). Also, it is possible that upper stories of the proposed ASB and HRB may be visible from this viewpoint, beyond the parking structure, extrapolating from the proposed site plan (Figure 2-1) and relative grade changes.

Overall, construction of the Hillside Parking Structure will notably change the view from this viewpoint from a private residence, and this degree of change is considered representative of what Via Hidalgo units immediately adjacent to that of Viewpoint 5 (51-54 Via Hidalgo) would experience. While recognizing this notable change in this private view(s), what is critical to this impact assessment for CEQA (as discussed above in *Approach*) is that this change does not affect the expansive and distinctive hillsides, ridges, and horizon that is the background of this private view – visual resources recognized and established in the Draft EIR.

Lighting and Glare

As discussed above for Viewpoint 2, the Draft EIR acknowledges that residents in parts of the Via Hidalgo complex closest to the Hillside Parking Structure were among those most potentially affected by the increase in light and glare from the new parking structure. See the discussion there of supplemental project design and operations elements that will further the less-than-significant impact determination in the Draft EIR.

From the Via Hidalgo viewpoint in particular (Figure 2-15), the rooftop level of the parking structure is almost level with the residential view, potentially increasing the risk of headlight and rooftop lighting glare. Planting oak woodland landscaping, which is comprised of evergreens and deciduous native oaks, along the edge of the property line would substantially, over time, adequately screen both the garage openings and most, if not all, of the rooftop parking. While no landscaping is shown in Figure 2-15, the Landscape Concept Plan (Figure 3-14R in Chapter 3 [Changes to the Draft EIR]) for the project illustrates the proposed species and location of project landscaping. In the oak woodland palette are oak and madrone species that would be approximately eight- to ten-feet tall when installed, gain approximately one foot of growth a year for the first 1-2 years, and mature to at least 15 to 30 feet tall with dense, broad canopies (Brenzel, 2012). As shown in Figure 2-8 in this chapter, the top of the parking structure's parapet will be approximately 29 feet above grade (which is the top of the retaining wall at the rear and sides of the structure). As indicated in project design approach "c" (previously discussed under *Viewpoint 2*), the new trees would be planted close to the property line, at elevations 85 to 100 feet, compared to approximately elevation 60 feet at the parking structure's retaining wall. Also, the property line ranges from 100 to 250 feet from the parking structure). As a result, even when newly installed (at eight feet), the proposed landscaping between the parking structure and the Via Hidalgo complex (and to lesser degree the Spyglass Hill complex, given its distance and elevation above the parking structure, and given existing intervening dense vegetation) would substantially screen the parking structure

openings and rooftop.³ Therefore, with incorporation of the supplemental design and operational approaches for lighting and glare listed in the Viewpoint 2 discussion, the project’s effect would continue to be considered less than significant, as identified in the Draft EIR. Again, each of these project components may be considered during the County of Marin’s Design Review of the project.

Summary

Treatment of Private Views Under CEQA

California courts recognize that a lead agency may treat visual effects on views from private property differently than views available to the public. Thus an EIR may find significant visual impacts of a project when viewed from a public vista point, but conclude that the effect on views from surrounding residences are less-than-significant. The following statements demonstrate the courts’ reasoning in making this distinction.

- “[W]e must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. The height, view and privacy objections raised by the Association impacted only a few of the neighbors and were properly considered by City” *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 734.
- “That a project affects only a few private views may be a factor in determining whether the impact is significant.” *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal. App.4th 396, 402.
- “[A] lead agency has the discretion to determine whether to classify an impact described in an EIR as ‘significant,’ depending on the nature of the area affected. ... In exercising its discretion, a lead agency must necessarily make a policy decision in distinguishing between substantial and insubstantial adverse environmental impacts” *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 493. (*Mira Mar* involved claims that a project would completely block views of the ocean from multiple mobile homes. The court in *Mira Mar* also noted that California land owners do not have a right to preserve views over adjoining property.)
- “Obstruction of a few private views in a project’s immediate vicinity is not generally regarded as a significant environmental impact.” *Bowman v. City of Berkeley* (2004) 122 Cal.App.4th 572, 586.
- “The possibility of significant adverse environmental impact is not raised simply because of individualized complaints regarding the aesthetic merit of a project. [Citations]” *Clover Valley Foundation et al. v City of Rocklin* (2011) 197 Cal.App.4th 200, 243.

The Draft EIR identified and evaluated the project’s effect on views from public vantage points, including the Spyglass Hill driveway ramp. The Final EIR adds three simulations of the Hillside Parking Structure to that evaluation, and confirms the Draft EIR’s conclusion that visual, light and glare impacts from this public viewpoint will be less-than-significant.

³ Conservatively, a newly-planted eight-foot tree would extend to about 33 feet with the 25-foot elevation increase.

One or more of the project buildings will be visible from a limited number of private residences in the vicinity. Some views will be affected, and there may be an increase in light and glare. The effect on each residence will be unique, based on its elevation, orientation, distance and intervening vegetation. The Final EIR adequately recognizes these potential effects, provides simulations and analyses for selected representative views, and notes factors expected to soften the effects. Even where such visual effects may be substantial, CEQA does not require that they be treated as significant. In preparing this EIR the District follows CEQA and court guidance, and determines that effects of the project on a relatively small number of private views and residences do not qualify for treatment as a potential significant effect.

Impact Summary

Development of the Hillside Parking Structure with the proposed project would result in notable changes to existing views toward and across the project site from parts of the hillside residential areas to the east and north of the project site, namely from private decks and windows of individual private dwelling units within Spyglass Hill and Via Hidalgo. (There are no particularly meaningful publically-accessible viewpoint locations in these areas from which large numbers of people would view the project site and areas beyond.) However, none of the changes demonstrated in the supplemental simulations (Figures 2-11, 2-12 and 2-15) and photos (Figures 2-13 and 2-14) in this section represent a substantial adverse effect to a significant visual resource or vistas. As discussed above, and specifically pertaining to the hillside areas of concern, these resources or vistas include the distant hillsides, ridgelines and unbroken horizon lines, and the limited views of Creekside Marsh and Corte Madera Creek visible beyond the project site from the subject hillside areas. Views affected are relatively few and from private owner and tenant units; there is no direct blocking of any of these resources.

Overall, the effects discussed above would not increase the severity of the potentially significant impacts already identified in the Aesthetics section of the Draft EIR for scenic vistas (on page 4.A-23, Impact AES-1) and scenic resources (on page 4.A-27, Impact AES-2). Also supplemental project design and operations elements are identified that would further the less-than-significant impact regarding light and glare identified in the Draft EIR. No additional mitigation measures are required.

2.4 New Employees Associated with the Project

The Draft EIR indicates throughout that a total of 426 new employees associated with the proposed Ambulatory Services Building and Nursing Unit Infill Project would be added to the project site (first fully described on Draft EIR page 3-16, and enumerated in Draft EIR Table 3-1 on Draft EIR page 3-37, and revised in this Final EIR in Chapter 3 [Changes to the Draft EIR]).

A review of the staff population assumptions done to prepare responses to certain comments on the Draft EIR revealed that, mistakenly, no additional staff were assumed to be needed to serve the 59 additional beds coming online in 2018. Therefore the total employee headcount required for the project was understated by 17 nurses. Adding 17 nurses to the 426 workers assumed in the Draft

EIR represents a 4 percent increase. (See calculation in response to Comment H-17 in Chapter 5, Responses to Written Comments Received on the Draft EIR, of this document.)

CEQA Impacts

Employee headcount is used in the EIR for the CEQA analysis of greenhouse gas emissions by service population; population, housing, and employment; and public services and recreation. No other environmental topics under CEQA are affected, as they rely on other variables in calculating project-related effects (e.g., number of beds, square footage). Factoring in the additional 17 nurses, or 4 percent increase in workers (426 to 443), does not materially affect the analyses or conclusions for these topics, as demonstrated below.

Greenhouse Gas Emissions by Service Population

Regarding the “GHG emissions per capita” threshold, an additional 17 nurses would increase the “service population” used to calculate the “per capita” GHG emissions from 286 to 303 for year 2020, and from 426 to 443 for year 2035. This reduces the per capita emissions of the proposed project (Impact GHG-2) *before mitigation* to 5.0 CO₂e (from 5.8 CO₂e) in 2020 and to 2.0 CO₂e (from 2.1 CO₂e) in 2035. *After mitigation*, the per capita emissions are reduced to 2.5 CO₂e (from 2.7 CO₂e) in 2020 and to 0.43 CO₂e (from 0.45 CO₂e) in 2035. The impacts would not change in either of these scenarios and would remain less than significant.

Regarding the “annual GHG emissions” threshold, the additional 17 nurses would not change the total emissions reported in the Draft EIR. Unlike the “per capita” threshold (which divides total emissions by service population on the project site, and thus decreases as population increases in many instances), the annual GHG emissions are a sum of the various operational sources that would be associated with the project (i.e., traffic, electricity generation, natural gas consumption, area sources, water usage, and solid waste land filling; see *Approach to Analysis* starting on Draft EIR page 4.F-8). The majority of GHG emissions come from traffic, energy, and waste sources, and the 17 additional nurses on the project site would not measurably increase either of these sources. Traffic is the greatest contributor to GHG emissions (see Draft EIR Table 4.F-2, revised in Chapter 3 [Changes to the Draft EIR] in this Final EIR document).

The 17 additional nurses on the project site would be associated with the Replacement Hospital Building, for which the vehicle trip generation rate is based on the number of hospital beds, not employees (see response to Comment J-8 in Chapter 5 [Responses to Written Comments Received on the Draft EIR] of this Final EIR). Therefore, the total traffic considered to calculate the project’s GHG emissions (using the established methods used in the Draft EIR and in standard practices) already assumed nurses and other staff needed to serve each hospital bed and does not change. Thus the total annual GHG emissions would not change and would continue to exceed the significance threshold of 1,100 annual CO₂e *before mitigation* and would still be reduced below the significance threshold *after mitigation* (see Draft EIR Table 4.F-5 and Table 4.F-6, revised in Chapter 3 [Changes to the Draft EIR] in this Final EIR document).

Population, Housing, and Employment

An additional 17 nurses (conservatively assuming they all would reside in Marin County) would represent 6.0 percent (rather than 5.8 percent) of the population growth that the Association of Bay Area Governments (ABAG) estimates for the county over the next 25 years (Impact POP-1), and would represent 3.9 percent (rather than 3.8 percent) of the county's population growth potential under the Countywide Plan (Impact POP-2).

Public Services and Recreation

An additional 17 nurses would not increase residential population in the county or region or on-site such that it would result in substantial adverse physical impacts to fire protection and emergency medical services (Impact PSR-1), police protection (Impact PSR-2), or recreational facilities (Impact PSR-5). Quantitatively, an additional 17 staff would result in 13 more new students in Marin County school districts than previously reported in the Draft EIR (see Impact PSR-2 starting on Draft EIR page 4.L-15), and would decrease the park standard by 0.02 points (or essentially zero) more than previously reported in the Draft EIR (see Impact PSR-3 starting on Draft EIR page 4.L-16). In both cases, the impact would not materially change and would remain less than significant.

In summary, no new significant CEQA impacts will occur as a result of the increased number of workers, no previously identified less-than-significant impact will become significant, and no previously identified significant impact will become measurably worse or will become unavoidable after already-identified mitigation.

The Draft EIR text changes reflecting each of the above changes are presented in Chapter 3 (Changes to the Draft EIR) of this Final EIR, in the order that they would occur in the Draft EIR document.

Non-CEQA Parking Demand

Employee headcount is also used for the non-CEQA hospital-related parking demand assessment. The number of parking spaces required for hospital employees is based on the number of full-time equivalent (FTE) employees. Conservatively, without factoring in the 90 spaces at St. Sebastian's Church, the parking deficit of the proposed project in 2018 would be increased from 19 to 26 spaces, and the parking shortfall at 2035 would be increased from 93 to 104 spaces. Assuming the 90 parking spaces at St. Sebastian's Church, the parking surplus of the proposed project in 2018 would be reduced from 71 spaces to 64, and the parking shortfall at 2035 would be increased from 3 spaces to 14 spaces. Thus, this non-CEQA topic conclusion is also not substantially worsened by an increased shortfall of 11 spaces.

The Draft EIR text changes reflecting each of the above changes are also presented in Chapter 3 (Changes to the Draft EIR) of this Final EIR, in the order that they would occur in the Draft EIR document. The text changes are also reflected in the responses to Comments in this Final EIR (Chapters 5 and 6).

References – Project Clarifications and Additional Information

Brenzel, Kathleen Norris, *The New Sunset Western Garden Book*, 9th ed. New York: Little Brown & Co, February, 2012.

CHAPTER 3

Changes to the Draft EIR

3.1 Introduction

This chapter presents all the changes required to the Draft EIR. The changes are either initiated by the Marin Healthcare District (District) as the Lead Agency or in response to public comments received on the Draft EIR. Changes include corrections and modifications to information presented in the Draft EIR to ensure accuracy and clarity. Throughout this chapter, newly added text is shown in double underline format, and deleted text is shown in ~~double strikeout~~ format. The source of each change is noted in brackets following each change.

Because some changes are initiated by the District, they do not appear in Chapter 5 (Responses to Written Comments on the Draft EIR) or Chapter 6 (Responses to Comments Received at the Public Meeting on the Draft EIR). Several District-initiated changes are presented initially in Chapter 2 (Project Clarifications and Additional Information).

Changes are listed generally in the order in which they would appear in the Draft EIR. A revised Summary of Impacts and Mitigation Measures and Residual Impacts (Table 2-1R) shows the revised text of all impact statements and mitigation measures and is presented at the end of this chapter.

As indicated in Chapter 1 (Introduction), the entirety of the Marin General Hospital Replacement Building Project Final EIR consists of the Draft EIR and its Appendices, and this Response to Comments document and its Appendices.¹ Thus, the Draft EIR changes presented in this chapter are incorporated in and supersede corresponding original text in the Draft EIR, as specified in this chapter.

¹ As titled, this document includes responses to public comments received on the Draft EIR - a key component of the Final EIR. However, this document is commonly referred to simply and collectively as the "Final EIR".

3.2 Revisions to Draft EIR

Chapter 1, Introduction

- 1) The first sentence of Draft EIR page 1-1 is modified as follows:

The Marin Healthcare District (“District”) has prepared this Environmental Impact Report (EIR) for the Marin General Hospital Replacement Building Project (“proposed project” or “project”), located in unincorporated Marin County, in the vicinity of~~between~~ the communities of Kentfield and Greenbrae.

[D-11-b]

- 2) The following additional text is added at the end of the third paragraph on Draft EIR page 1-1, and the last paragraph on Draft EIR page 2-1:

The project will also renovate approximately 75,000 square feet within the existing hospital.

[H-1]

Chapter 2, Summary

- 3) The second paragraph of Draft EIR page 2-1 is modified as follows:

The Marin Healthcare District (“District”) has prepared this Environmental Impact Report (EIR) for the Marin General Hospital Replacement Building Project (“proposed project” or “project”), located in unincorporated Marin County, in the vicinity of~~between~~ the communities of Kentfield and Greenbrae.

[D-11-b]

- 4) The first sentence in the fourth paragraph on Draft EIR page 2-2 is clarified as follows:

The project proposes to install two new traffic signals at the two main access/exit driveways to the project site off Bon Air Road; the northern signal installed upon operation of the Hillside Parking Structure (Phase I) ~~Hospital Replacement Building~~ and the southern driveway signal at a latter phase when warranted (either Phase V or VI).

[D-12]

- 5) The sixth paragraph on Draft EIR page 2-2 is modified as follows:

A total of ~~426~~ 443 new employees would be added to the project site. The project would not result in a net increase in the existing number of licensed beds on the project site; however, 87 new beds would be added to the 148 beds currently in use onsite.

[District Initiated, H-17 and H-3]

Chapter 3, Project Description

- 6) New Figures 2-2 through 2-9 presented in Chapter 2 (Project Clarifications and Additional Information) of this Final EIR are intended to supplement Figures 3-9 through 3-12b in Chapter 3 (Project Description) of the Draft EIR. All dimensional information (heights and setbacks of buildings and their appurtenances) shown on the plans and sections in this Final EIR supersede those identified on the aforementioned Draft EIR figures, as well as cited in other exhibits or text throughout the Draft EIR, to the extent there is a difference between the Draft EIR and Final EIR exhibits.

[District Initiated]

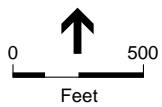
- 7) Figure 3-2, Aerial Project Site and Surroundings, on Draft EIR page 3-3 is modified to accurately depict the project site boundary, as shown on the following page as Figure 3-2R.

[D-11-a]

- 8) The following text is added to the second sentence on Draft EIR page 3-8:

The hospital has three wings: Central, East and West Wings, and also includes the Marin Community Mental Health Building adjacent to the existing hospital building. The hospital is licensed to have up to 235 beds, and currently has 148 beds in use. ~~There are a total of 235 licensed beds on the campus,~~ including 17 beds in the Mental Health Building.

[H-2]



SOURCE: ESA

Marin General Hospital . 210606

Figure 3-2R
Aerial of Project Site and Surroundings

- 9) The following clarification is made to the second paragraph on Draft EIR page 3-13:

A ~~No~~ northern portion of the project site along Bon Air Road is located within an area classified as “other flood areas”, which includes chance of the 100-year flood, but with depths of less than one foot.

[D-9]

- 10) The last paragraph on Draft EIR page 3-16 is modified as follows:

A total of ~~426~~ 443 new employees would be associated with the proposed Ambulatory Services Building and the Hospital Replacement Building and Nursing Unit Infill Project ~~would~~ to be added to the site. The project would not result in a net increase in the existing number of licensed beds on the project site; however, 87 new beds would be added to the 148 beds currently in use onsite.

[District Initiated, H-17 and H-3]

- 11) The following text is added to the end of the *Hospital Replacement Building* paragraph on Draft EIR page 3-29:

The new hospital would continue to operate with 235 licensed beds resulting in a net increase of zero licensed hospital beds for the project; 87 new beds would be added to the 148 beds currently in use onsite, matching the number of beds licensed for the project site.

[H-3]

- 12) Table 3-1 on Draft EIR pages 3-37 and 3-38 is revised to distinguish licensed beds from beds in use and to show projected in-use beds for the project, as shown on the following page as Table 3-1R.

[H-3]

**TABLE 3-1R
PROJECT DEVELOPMENT SUMMARY BY PHASE AND TOTAL BUILDOUT**

	Proposed Hospital Replacement Building	Existing Hospital (West and Central/East Wings)	Existing Hospital Mental Health Building	Existing Mental Health Building (County Offices)	Proposed Ambulatory Services Building	Existing Ancillary Buildings / Areas Affected by the Project ^a	Change from Existing Conditions ^b	Total / Running Total on the Project Site
Existing Conditions								
Site Acres ^c								19.7
Building Area (square feet) ^a		255,000	16,500	18,500		15,500		305,500
Hospital Beds (<u>Licensed</u>)		218	17					235
<u>Hospital Beds (In Use)</u>								<u>148</u>
Total On-Site Parking Spaces						605		605
Total employees (FTE) ^c						1,126		1,126
Phase I Hillside Parking Structure (2012 – 2013)								
Demolished Building Area (square feet)							0	
New Building Area (square feet)							0	305,500
Hospital Beds (<u>Licensed</u>)							0	235
<u>Hospital Beds (Projected In Use)</u>								<u>148</u>
Total On-site Parking							398	1,003
Phase I Net Change in On-site Parking						398	398	398
<i>Removed On-Site Parking Spaces</i>						(14)	(14)	(14)
<i>New On-Site Parking Spaces</i>						412	412	412
Total employees (FTE) ^c						0	0	1,126
Phase II Site Preparation and Bon Air Road Parking Structure (2013 – 2014)								
Demolished Building Area (square feet)							0	0
New Building Area (square feet)							0	305,500
Hospital Beds (<u>Licensed</u>)							0	235
<u>Hospital Beds (Projected In Use)</u>								<u>148</u>
Total On-site Parking							328	1,331
Phase II Net Change in On-site Parking						328	328	726
<i>Removed On-Site Parking Spaces</i>						(179)	(179)	(193)
<i>New On-Site Parking Spaces</i>						507	507	919
Total employees (FTE) ^c						0	0	1,126
Phase III Ambulatory Services Building (2013 – 2015)								
Demolished Building Area (square feet)							0	0
New Building Area (square feet)					100,000		100,000	405,500
Hospital Beds (<u>Licensed</u>)							0	235
<u>Hospital Beds (Projected In Use)</u>								<u>148</u>
Total On-site Parking							(58)	1,273
Phase III Net Change in On-site Parking						(58)	(58)	668
<i>Removed On-Site Parking Spaces</i>						(58)	(58)	(251)
<i>New On-Site Parking Spaces</i>							0	919
Total employees (FTE) ^c					286		286	1,412
Phase IV Hospital Replacement Building and Potential Elevated Pedestrian Bridge (2015 – 2019)								
Demolished Building Area (square feet) ^d						(15,500)	(15,500)	15,500
New Building Area (square feet)	300,000						300,000	690,000
Hospital Beds (<u>Licensed</u>)	122	(122)					0	235
<u>Hospital Beds (Projected In Use)</u>	<u>59</u>						59	<u>207</u>
Total On-site Parking							(194)	1,079

TABLE 3-1R (Continued)
PROJECT DEVELOPMENT SUMMARY BY PHASE AND TOTAL BUILDOUT

	Proposed Hospital Replacement Building	Existing Hospital (West and Central/ East Wings)	Existing Hospital Mental Health Building	Existing Mental Health Building (County Offices)	Proposed Ambulatory Services Building	Existing Ancillary Buildings / Areas Affected by the Project ^a	Change from Existing Conditions ^b	Total / Running Total on the Project Site
Phase IV Hospital Replacement Building and Potential Elevated Pedestrian Bridge (2015 – 2019) (cont.)								
Phase IV Net Change in On-site Parking						(194)	(194)	474
<i>Removed On-Site Parking Spaces</i>						(1943)	<i>(194)</i>	<i>(445)</i>
<i>New On-Site Parking Spaces</i>							0	919
Total employees (FTE) ^c	<u>17</u>						<u>17</u>	<u>4,412</u> 1,429
Phase V Central and East Wing Renovations (2019 – 2020) / Phase VI Nursing Unit Infill Project (2023 – 2025)								
Demolished Building Area (square feet)							0	15,500
New Building Area (square feet)							0	690,000
Hospital Beds (<u>Licensed</u>)	28 ^e	(28)					0^e	235
<u>Hospital Beds (Projected In Use)</u>	<u>28^e</u>						87	<u>235</u>
Total On-site Parking							0	1,079
Phase V-VI Net Change in On-site Parking							0	474
<i>Removed On-Site Parking Spaces</i>							0	<i>(445)</i>
<i>New On-Site Parking Spaces</i>							0	919
Total employees (FTE) ^c	140 ^e						140	1,552 <u>1,569</u>

a Includes floor area and employees only for existing buildings affected by the proposed project: approximately 290,000 square feet in the existing hospital, and approximately 15,500 square feet of office and support service uses in temporary buildings. A small bulk oxygen facility would not be altered by the proposed project and thus are not included in this table. All floor area data are approximate.

b "Change" column represents the overall physical change in the Marin General Hospital campus evaluated in this EIR.

c FTE is full time equivalent employees.

d Demolition of all ancillary buildings, including an approximately 1,500 square-foot portion of the existing Internet Technology (IT) offices located north of the proposed Ambulatory Services Building.

e New 28-Unit Nursing Unit Infill Project at the Hospital Replacement Building.

- 13) The following is added to the end of the Phase IV description on Draft EIR page 3-39:

A total of 17 new employees associated with the Hospital Replacement Building would be added to the project site during this phase.

[District Initiated and H-17]

- 14) The following is added to the end of the Phase VI description on Draft EIR page 3-40:

A total of 140 new employees associated with the new nursing unit would result during this phase, for a total of ~~426~~ 443 new employees at buildout (when combined with the 286 new employees in the Phase III Ambulatory Services Building and the 17 new employees in the Phase IV Hospital Replacement Building).

[District Initiated and H-17]

- 15) The list under *Sustainability Elements* that starts on Draft EIR page 3-42 is supplemented with the following that was previously omitted:

- **Transportation Demand Management (TDM):** The project currently operates valet parking services, provides shuttle transit services, maintains five carpool spaces onsite, and offers a benefit program through which employees receive pre-tax transit expense reimbursements.¹ The hospital also currently coordinates with 511 Rideshare, a San Francisco Bay Area organization that provides assistance to employers relative to travel demand management.

¹ Funds are deducted from employee salary, pre-tax. Those funds are then reimbursed to the employee, immediately but separate and untaxed.

[D-13-c]

- 16) The second sentence of the last paragraph on Draft EIR page 3-43 is revised as follows.

The sequencing of the proposed bus stops is described above in Section 3.5.3, *Project Activities by Phase*, ~~and shown in Figures 4.N-3 through 4.N-6 in Chapter 4 of this Draft EIR.~~

[D-1-e and PM-37]

- 17) Figure 3-14, Landscape Concept Plan, on Draft EIR page 3-38 is modified to depict an expanded “oak woodland” palette of trees along the northeast/east project site boundary, as shown on page 3-11 as Figure 3-14R.

[District Initiated]

- 18) Table 3-2 and the related discussion that follows it on Draft EIR page 3-45 is revised as follows:

**TABLE 3-2
PARKING SUMMARY**

Area / Type	Total Spaces (Near-Term 2018)	Total Spaces (2035)
Surface Parking:	160	160
Hillside Parking Structure:	412	412
Bon Air Road Parking Structure:	507	507
Total On-Site Parking Provided	1,079	1,079
Total Parking Demand	4,098 1,105	4,172 1,183
Surplus / (Short-fall)	(426)	(93104)
Projected Long-term Shared Parking Agreement ^a	90	90
Surplus / (Shortfall)	7464	(314)

^a No change is proposed to existing off-site parking at St. Sebastian Church, which the Marin Healthcare District would seek to keep available for hospital parking, but that is not included in the total parking used to meet the required parking demand of the project.

The total 1,079 parking spaces provided by the project would be ~~4926~~ spaces less than the ~~4098~~ **1,105** space demand of the project in Year 2018 (~~after the Ambulatory Services Building is operation, but before completion of the Hospital Replacement Building~~). The parking demand in Year 2035 would increase to ~~4,172~~ **1,183** parking spaces due to additional employees in the Hospital Replacement Building, increasing the on-site parking shortfall to ~~93~~ **104** spaces.

The Marin Healthcare District would seek to continue its present arrangement and enter into a long-term shared parking agreement with St. Sebastian Church located just northwest of the campus. A long-term agreement would secure an additional 90 parking spaces for employee use. With these additional spaces, the project would exceed parking demand by ~~71~~ **64** spaces in Year 2018, and would have a ~~three~~ **14**-space shortfall compared to parking demand in Year 2035. The church parking lot would continue to be served by hospital shuttle services if the 90 spaces are secured long term. As described in the following section, the project would also provide landscaping that would ensure safe driver sightlines within the site, as well as

strategically-located pedestrian crossings as previously discussed under *Pedestrian Access*. (Also see Section 3.7.2, *Parking During Construction*.)

[District Initiated and H-17]

- 19) The third paragraph on Draft EIR page 3-46 is modified as follows:

Approximately ~~264~~ 304 trees would be planted in new landscaping, approximately 159 trees would be retained in place for development of the project, and approximately 35 trees would be relocated within the project site.

[District Initiated]

- 20) The second sentence of the first paragraph on Draft EIR page 3-52 is modified as follows:

Overall, initial construction activities for the first phase would start in ~~2013~~2012, and all major construction associated with the project would be completed by 2020.

[D-13-h]

- 21) New Figure 3-18, Preliminary Stormwater Control Plan, is added following Draft EIR page 3-62, and is shown two pages from here, following Figure 3-14R.

[D-13-g, D-18-c, I-10]

- 22) The third paragraph on Draft EIR page 3-66 is modified as follows:

The publicly-owned sanitary sewer main is owned by Ross Valley ~~Sanitation~~ Sanitary District (RVSD) and the project would require the realignment of the existing sanitary sewer pipe and modification to the existing pressure pipe.

[C-2]



MARIN GENERAL PLANT LIST

- TREES**
- EXISTING
 - OAK WOODLAND (39)
 ARBUTUS MENZIESII
 QUERCUS LAEVOGARNA
 QUERCUS LAEVOGARNA
 - EVERGREEN CONIFER (74)
 PINUS SACCATA
 PICEA MARIANA
 SEQUOIA SEMPERPARVENS SANTA CRUZ
 - DECIDUOUS SHADE (38)
 ACER CALIFORNICUM
 LIRIODENDRON TUPELO
 PRUNUS SEROTINA
 PLATANUS AEGYPTIACA
 - ORNAMENTAL/ACCENT (18)
 ACER PLATANUS
 LAGERSTROMIA INDICA
 BIRCHULUS S. SULLIVANII
 - PALM (35)
 PHOENIX CANARIENSIS
 MARCHESIA FLUTEA
- (304) TOTAL TREES PROPOSED

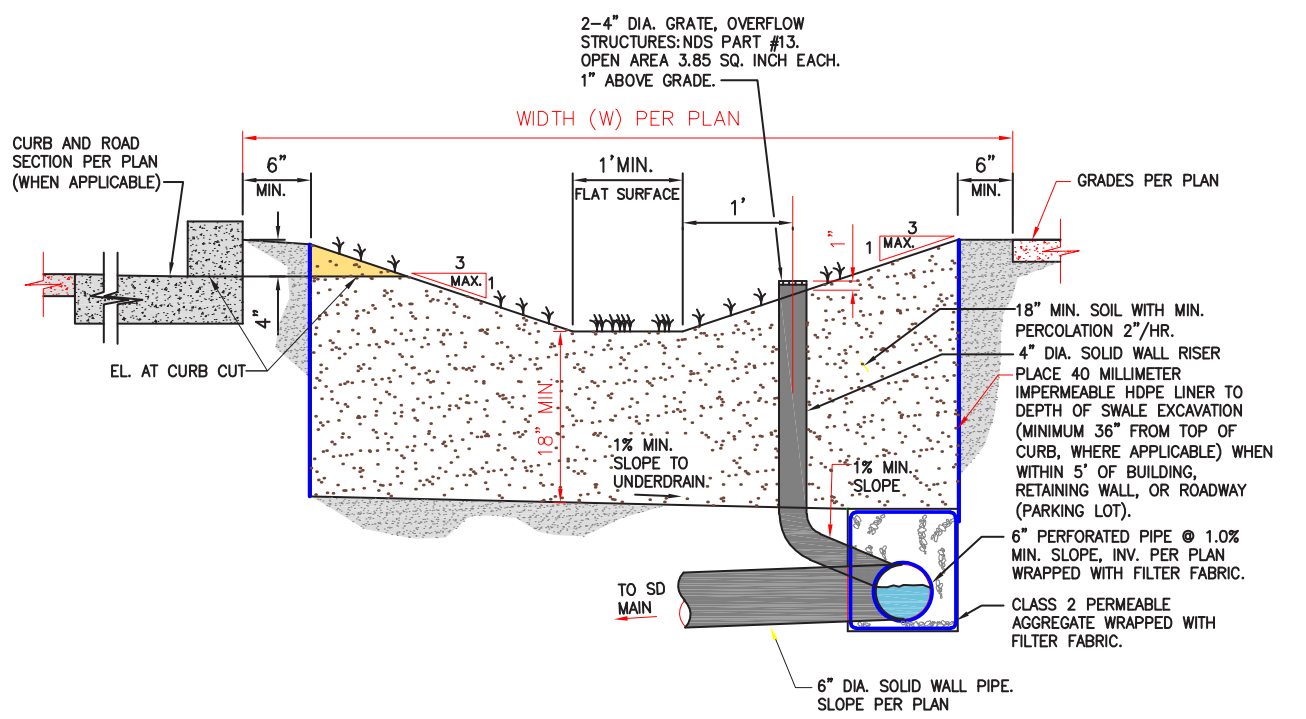
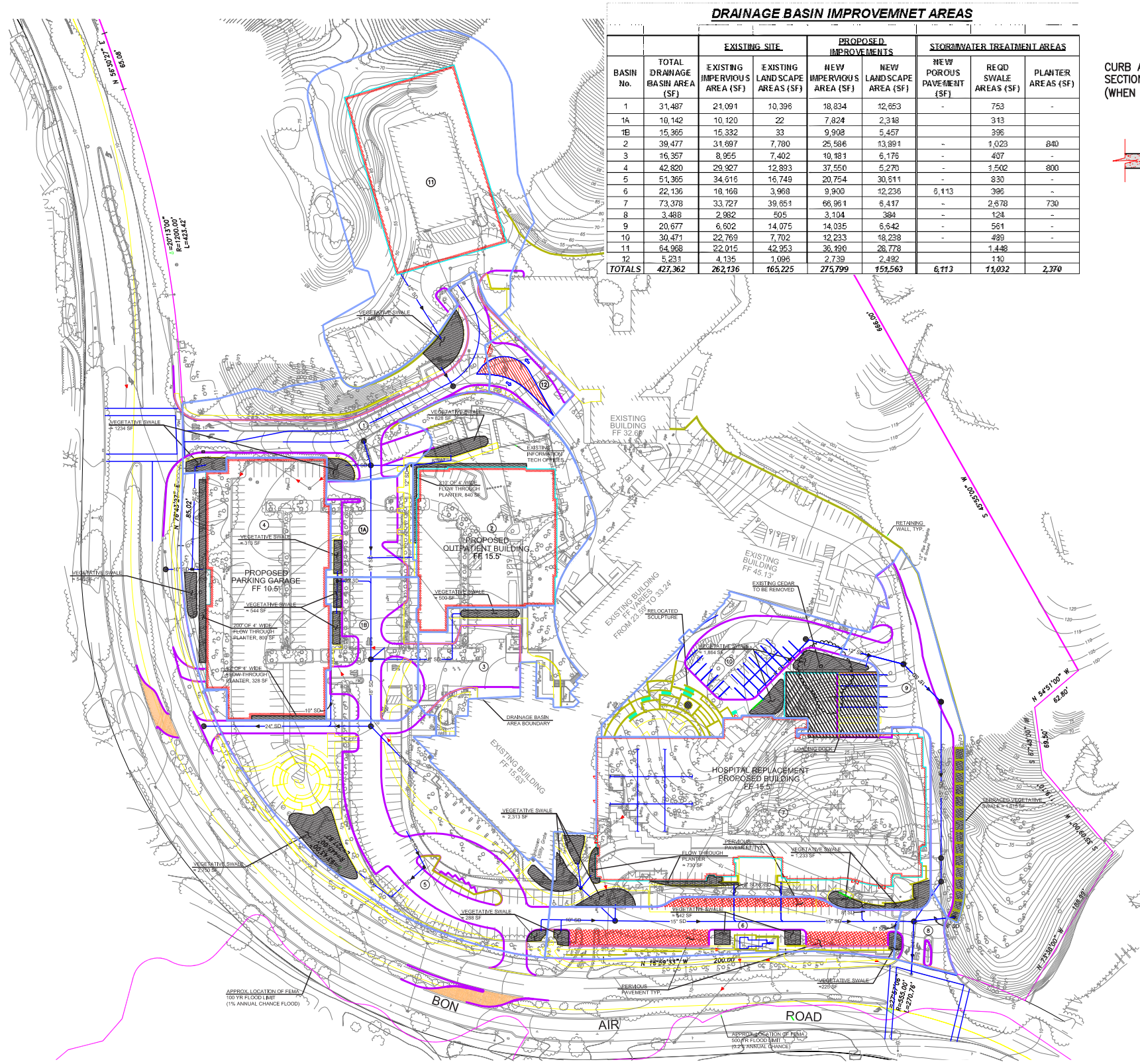
BUILDING INVENTORY

- 1 EXISTING WEST WING
- 2A EXISTING CENTRAL WING
- 2B EXISTING EAST WING
- 3 EXISTING MENTAL HEALTH
- 4 EXISTING BULK OXYGEN
- 5 EXISTING INFORMATION TECH OFFICES
- 6 HOSPITAL REPLACEMENT BUILDING
- 7 AMBULATORY SERVICES BUILDING
- 8A PARKING STRUCTURE
- 8B HILL SITE PARKING STRUCTURE
- 9 UNDERGROUND GENERATORS

LANDSCAPE INVENTORY

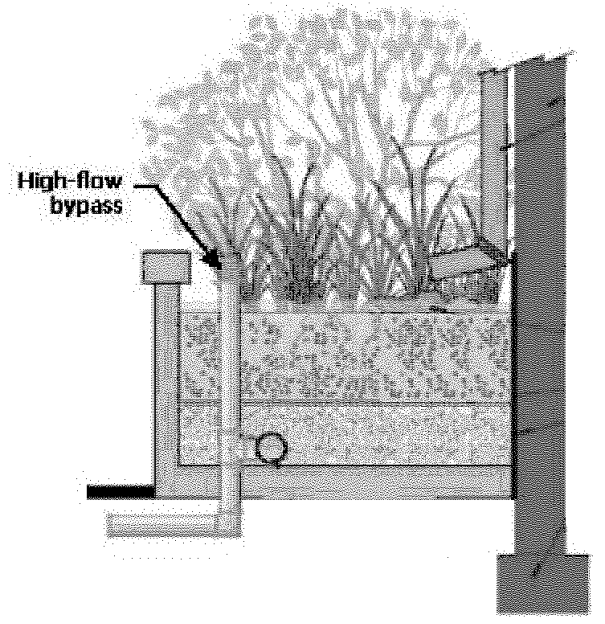
- A ENTRY FOUNTAIN
- B COVERED DROP-OFF
- C BUS STOP
- D CAFE TERRACE
- E OUTDOOR COURTYARD
- F COVERED WALK
- G SUNKEN GARDEN
- H UPPER TERRACE
- I SHADE GARDEN
- J BIOSWALE PLANTING
- K GREEN ROOF
- L STORMWATER GARDEN
- M SCREENING TREES





NOTES:
 1. FOR SWALES WITH A MINIMUM WIDTH OF 5' THE MAXIMUM 3H:1V SIDE SLOPE CAN BE INCREASED TO 2H:1V.

VEGETATIVE SWALE SECTION
 N.T.S.



TYPICAL FLOW THROUGH PLANTER SECTION
 N.T.S.

- 23) The first sentence of the fourth paragraph on Draft EIR page 3-66 is modified as follows:

The proposed project would relocate a portion of an existing ~~428~~-inch sanitary sewer force main into the Bon Air Road public right of way.

[C-4]

- 24) The following is added to the end of the fourth paragraph on Draft EIR page 3-66 as follows:

Depending on RVSD's evaluation of an existing gravity sewer main downstream from the project site to the connection to the trunk sewer at 350 Bon Air Road and Via Hidalgo, the project may be required to upgrade the existing gravity sewer main system on the project site and in Bon Air Road.

[District Initiated]

- 25) The following revisions are made under *County of Marin* at the top of Draft EIR page 3-68:

The County would make decisions on the following discretionary actions (and other considerations and approvals) that have been identified at the time this EIR was prepared:

- Approval of Property Swap or Lease Agreement for construction of the Hillside Parking Structure (County Administrator);
- Design Review (pursuant to Development Code section 22.14.040, Special Purpose District Development Standards) (County Community Development Agency);
- Any work in the Bon Air Road Right of Way (County Public Works); ~~and~~
- Grading Permit for earthwork associated with the project;
- Building Permit for Parking Structures and Ambulatory Services Building (County Building Department); and
- Elimination of parking spaces on Bon Air Road.

[D-13-k]

26) The bulleted list on Draft EIR page 3-69 is modified as follows:

- Ross Valley ~~Sanitation~~Sanitary District (RVSD)

[C-2]

4.A Aesthetics

27) Section 2-3 (Additional Visual Simulations and Site Photos) and Figures 2-10 through 2-15 in Chapter 2 (Project Clarifications and Additional Information) of this Final EIR supplement the scenic vistas analysis (Impact AES-1), starting on page 4.A-23 of the Draft EIR. Specifically Figures 2-10 through 2-15 supplement the set of visual simulations that precede Draft EIR page 4.A-23, and the descriptions and analysis discussion supports the impact discussion and generally inserts before *Conclusion* at the top of Draft EIR page 4.A-27.

[M-1, H-11, and District Initiated]

28) Figure 4.A-1, Viewpoint Map, on Draft EIR page 4.A-2 is modified to accurately depict the project site boundary and to distinguish it for the visual simulations and photos presented in the Draft EIR document, as shown on the following page as Figure 4.A-1R.

[D-11-a]

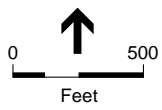
29) The first sentence in the second paragraph on Draft EIR page 4.A-46 is revised as follows:

A total of 150 existing trees would be retained in-place and approximately ~~264~~ 304 new trees introduced to the site.

[District Initiated]

30) The following replaces the second full paragraph on Draft EIR page 4.A-31:

~~While lighting fixtures inside the parking structures would be ceiling mounted and would not cast direct glare, the overall lit environment would be seen. The project would limit visibility of rooftop lighting on the parking structures by restricting access to the parking level during nighttime hours, which the project is also implementing to reduce energy usage. Rooftop parking lighting would however be provided for safety and to meet code requirements; it would be pole-mounted lighting that is shielded and cast downwards. After the proposed landscaping matures, the~~



SOURCE: ESA

Marin General Hospital . 210606

Figure 4.A-1R
Viewpoint Map (Draft EIR)

~~garage side openings would be partially screened from view which would reduce overall lighting visibility (see Figures 4.A-12 and 4.A-13).~~

The project will incorporate the following several design and operational approaches to avoid adverse nighttime views:

- a) The Hillside Parking Structure is “pushed” into the hillside, which helps reduce noise impact and lighting effects (as well as scale and visual effects). (*Hillside Parking Structure Only*)
- b) The exterior openings are open enough to allow for natural ventilation of the structure but are also above the hood of most vehicles and therefore block headlight leakage out of the structure. (*Both Parking Structures*)
- c) New landscaping would be located to maximize the screening of the parking structure facades, primarily to shield potential light “spillage” from the side of the parking structure as well as from the rooftops (from headlights or garage lighting). In particular, an “oak woodland” palette of trees is indicated in the concept landscape plans to augment the existing hillside trees that will remain. New landscaping would be planted as high up on the slope and as close to the property line (along the crest of the hill, at elevations 85 to 100 feet [compared to elevations 60 to 65 at the top of the rear and side retaining walls of the parking structure]), to provide effective screening between the residential areas to the northeast/southeast (i.e., Via Hidalgo and Spyglass Hill/Corte Casitas). (The expanded landscape plans are shown in Figure 3-14R and Figure 4.C-2R in Chapter 3 [Changes to the Draft EIR]).
- d) The project would restrict access to the rooftop parking level of the Hillside Parking Structure to new parkers (which would primarily be staff) during nighttime hours (after dusk and until dawn, year round).¹ This would substantially reduce the potential for adverse nighttime views due to light and glare. In winter it gets dark earlier (near 5:00 p.m.) and stays dark later (near 7:30 a.m.), so rooftop lights and automobile headlights would be on in early evenings and early mornings as workers leave or arrive, but this would not be considered a nuisance to nearby residents at those hours.
- e) Rooftop parking lighting during nighttime hours would be limited to that necessary to ensure safety and to meet all code requirements and professional standards. This restriction for the Hillside Parking Structure would be implemented in tandem with an automatic motion sensor system that would trigger the rooftop parking light fixtures into use only as needed during nighttime hours (after dusk and until dawn, year round). In winter it gets dark earlier (near 5:00 p.m.) and stays dark later (near 7:30 a.m.), so the reduced rooftop lighting would be on in early evenings and early mornings, but this

¹ Of the total 412 parking spaces in the Hillside Parking Structure, 40 spaces are on the rooftop (as shown on Draft EIR Figure 3-9). The project would introduce to the campus approximately 443 new employees (as modified in the Final EIR), slightly more than two-thirds (286) associated with the new Ambulatory Services Building and the other one-third (157) being hospital nursing staff (see Table 3-1R in the Final EIR). It is unlikely that all 443 new staff would have the same work shift, or have shifts that start or end during nighttime hours. Therefore, it is reasonable that the Hillside Parking Structure, as well as campus-wide parking, could accommodate the temporary restriction of 40 rooftop parking spaces from dusk to dawn to avoid potential adverse views due to lighting and glare.

would not be considered a nuisance to nearby residents at those hours. (Hillside Parking Structure Only)

- f) All rooftop parking light fixtures would be pole-mounted (excepted as specified with the optional solar panel trellis) and shielded and cast downwards. Plans for the parking structures conservatively assume light poles that are 20 feet above the roof if the optional solar panel trellises are not developed. (Both Parking Structures)
- g) If the optional solar panel trellises are developed on the Hillside Parking Structure, all of the 20-foot-tall light poles will be removed and replaced with an appropriate number of 10-foot-tall light poles, except in the center area where the solar panel trellis would be installed (as shown in Final EIR Figures 2-8, 2-9, 2-11, 2-12 and 2-15). The number and rooftop location of the replacement 10-foot light poles shall determined by a qualified professional lighting engineering to confirm no overall increase in lighting levels. (Hillside Parking Structure Only)
- h) If the optional solar panel trellises are developed, lighting mounted directly on the trellis and appropriately shielded and cast downwards to a point below the light bulb and reflector will provide the primary rooftop parking lighting and be supplemented by the shorter 10-foot light poles. (Hillside Parking Structure Only)
- i) All light fixtures inside parking structures (below the rooftop parking level) would be ceiling mounted and cast downwards to a point below the light bulb and reflector to not cast direct light or glare above horizontal. (Both Parking Structures)
- j) All new exterior lighting (all parking levels) would be shielded and cast downwards to a point below the light bulb and reflector to not direct light or glare above horizontal. (Both Parking Structures)

[District Initiated]

4.B Air Quality

- 31) Revisions are made to the next to last sentence in the second paragraph on Draft EIR page 4.B-13:

As described more-fully below (see Impact TRA-4), the existing Marin General Hospital Travel Demand Management (TDM) program includes the use of valet services, ~~and~~ shuttle transit service, onsite carpool parking spaces, and pre-tax transit expense reimbursements for employees.

[D-13-c]

- 32) Under Impact AIR-3 on Draft EIR page 4.B-19, the fifth sentence in the first paragraph is modified as follows:

Closest residences would be about 100 feet (Via Hidalgo) and 200 feet (Spyglass Hill) from the nearest grading activities (associated with the Hillside Parking Structure); however, most construction activity would occur at distances greater than ~~200-100~~ feet.

[District Initiated]

4.C Biological Resources

- 33) The following modification is made to the first sentence of measure “d” of Mitigation Measure BIO-1 on Draft EIR 4.C-23, as follows:

- d) A no-disturbance buffer shall be created around active bat roosts being used for maternity purposes at a distance to be determined by the qualified bat biologist in consultation with CDFW~~CDFG~~.

[District Initiated]

- 34) The following modification is made to the first sentence of Mitigation Measure BIO-3b on Draft EIR 4.C-26, as follows:

Mitigation Measure BIO-3b: If active nests are found during pre-construction surveys, the results of the surveys shall be discussed with the CDFW~~CDFG~~ and avoidance procedures shall be adopted, if necessary, on a case-by-case basis.

[District Initiated]

- 35) The following modifications are made to Mitigation Measure BIO-4a on Draft EIR 4.C-29, as follows:

Mitigation Measure BIO-4a: (Applies to major noise generating construction and/or demolition phases occurring within 200 feet of Creekside Marsh, as delineated in the Mitigation Monitoring and Reporting Program Attachment 1) To ensure P~~project~~ construction activities ~~do not that would~~ exceed existing ambient noise levels (as documented by long-term noise measurement LT-3, as shown in Figure 4.J-1R provided in the Final EIR, to be 60-69 dBA Leq, as stated on page 4.J-5 of the Draft EIR) at Creekside Marsh by over 10dBA ~~will avoid and minimize adverse effects on California clapper rail reproductive success through one of the following measures:~~

- a) Project construction activities shall take place September-January, outside the clapper rail breeding season of February through August); or
- b) Consistent with Mitigation Measure NOI-~~32~~ in Section 4.K, Noise, noise reduction measures, including solid plywood fences, sound blankets, or other barriers with noise-dampening materials shall be constructed along portions of the western edge of the project site prior to initiation of construction to serve as noise attenuation barriers. Noise barriers shall be installed on the project site in all locations within 200 feet of the Corte Madera Creekside Marsh and grassland buffer (as delineated in Attachment 1 to the Mitigation Monitoring and Reporting Program and consistent with Figure 4.C-2R [in the Final EIR] supporting Mitigation Measure BIO-6). The barriers shall shield the marshes from major noise generating phases of demolition and construction and will serve to attenuate noise emanating from the project site so any direct or reflected noise would not create increases greater than 10 dBA above current ambient levels in the marshes, where there may be breeding California clapper rails. The ~~fencing~~ noise attenuation barrier shall be a minimum of 8 feet in height, but sufficient in height to reduce any noise from construction on upper stories or building rooftops.

To ensure these noise attenuation barriers prevent significant impacts to breeding California clapper rails, a qualified biologist and noise technician shall periodically monitor noise levels at the edge of Creekside Marsh at least four times per month during the duration of construction within the breeding season.

As an extra measure, the District shall retain a qualified biologist and noise monitor to monitor noise conditions at least four to five times during the month of January. The noise monitoring shall coincide with construction activities anticipated to produce the loudest noise. If sound levels are measured that exceed 10 dBA above ambient noise conditions, construction shall be temporarily halted and the contractor shall assess whether other work that would not exceed this threshold can be conducted during the phase of work. If no other construction can occur, work shall not re-commence until consultation with USFWS and CDFW¹ occurs.

Mitigation Measure BIO-4b: Implement Mitigation Measure NOI-~~32~~.

The combination of Mitigation Measure ~~NOI-3~~NOI-2 from Section 4.H, Noise, and the aforementioned Mitigation Measure BIO-3a, Mitigation Measure BIO-3b (if necessary), and Mitigation Measure BIO-4, will ensure that noise impacts of project construction will be minimized in the vicinity of active nests and will minimize and avoid potential adverse impacts on California clapper rail reproductive success at Creekside Marsh.

Significance after Implementation of Mitigation Measures: Less than Significant

[B-2 and B-3]

¹ Previously “California Department of Fish and Game” or “CDFG” at the time the Draft EIR was published. This revision is made throughout only where it affects mitigation measures and current discussion in this Final EIR.

- 36) Mitigation Measure BIO-3a on page 4.C-26 of the Draft EIR is modified as shown below in response to the comment:

Mitigation Measure BIO-3a: (Applies to Phases I-IV) No more than two weeks in advance of any tree or shrub pruning, removal, ground-disturbing activity, or other construction activity that will commence during the breeding season (February 1 through August 31), a qualified wildlife biologist shall conduct pre-construction surveys of all potential nesting habitat in the vicinity of the planned activity.

If construction activities for the project cease for a period of seven days or longer, or if construction does not begin within the immediate area within seven days of the initial pre-construction surveys, the qualified wildlife biologist shall conduct another pre-construction survey.

Pre-construction surveys are not required for construction activities scheduled to occur during the non-breeding season (August 31 through January 31). Construction activities commencing during the non-breeding season and continuing into the breeding season do not require surveys (as it is assumed that any breeding birds taking up nests would be acclimated to project-related activities already under way).

If active nests are found on the site during construction, construction shall be temporarily halted and the consultation with the State Department of Fish and Wildlife will be required before re-commencing construction activities. Nests initiated during construction activities would be presumed to be unaffected by the activity, and a buffer zone around such nests would not be necessary. However, a nest initiated during construction cannot be moved or altered and the nests shall be clearly identified and the immediate area fenced to prevent destruction.

If pre-construction surveys indicate that no nests are present or that nests are inactive or potential habitat is unoccupied, no further mitigation is required. If active nests are found during pre-construction surveys, Mitigation Measure BIO-3b will be required.

[B-4]

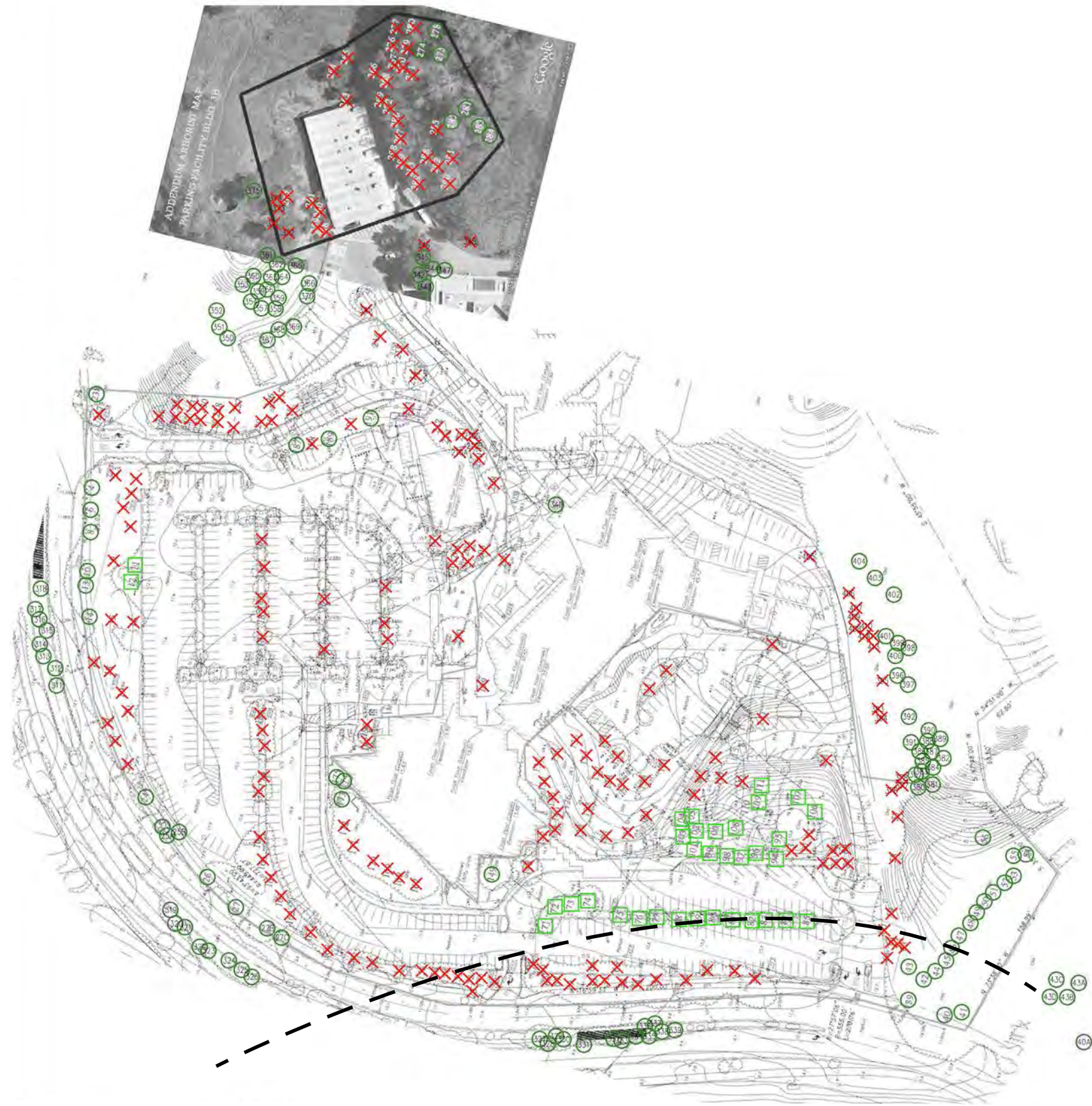
- 37) The third paragraph on Draft EIR page 4.C-31 is revised as follows:

Approximately ~~264~~ 304 trees will be planted in new landscaping, approximately 159 trees will be retained in place for development of the project, and approximately 35 trees will be relocated within the project site

[District Initiated]

- 38) Figure 4.C-2, Tree Inventory and Plan, following Draft EIR page 4.C-32, is modified to depict an expanded “oak woodland” palette of trees along the northeast/east project site boundary, as shown on the following page as Figure 4.C-2R.

[District Initiated]



MARIN GENERAL TREE INVENTORY

TREES

- TREES TO BE RETAINED IN-PLACE
(159) TOTAL TREES
- TREES TO BE RELOCATED FOR
FUTURE PHASES OF DEVELOPMENT
(35) TOTAL TREES
SPECIES: WASHINGTONIA FULVENS
PHOENIX CARARENSIS
- ✕ TREES TO BE REMOVED BASED
ON FUTURE PHASES OF DEVELOPMENT
(230) TOTAL TREES

TOTAL NUMBER OF TREES SURVEYED: 424

TOTAL NUMBER OF TREES PROTECTED
BY MARIN TREE ORDINANCE: 232

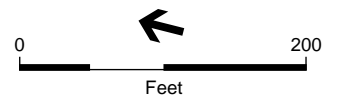
- SPECIES: ACQUILUS CALIFORNICA
ALNUS RHOMIFOLIA
AMRIBUS MENZIESII
QUERCUS ARIFFOLIA
QUERCUS DUMMELPUS
QUERCUS KELLOGGII
QUERCUS LORNA
SECURIDIA SOUTHWESTENSIS
UMBELLIFERA CALIFORNICA

TOTAL NUMBER OF PROTECTED TREES
TO BE REMOVED: 143

TOTAL NUMBER OF TREES TO BE PLANTED
PER LANDSCAPE PLAN: 304

NOTES:
FINAL DETERMINATION OF TREES TO BE EITHER
RELOCATED OR REMOVED WILL BE SUBJECT TO
CONDITIONS IN THE FIELD. REFER TO TREE SURVEY
PROVIDED BY URBAN FORESTRY ASSOCIATES, INC.
FOR ADDITIONAL INFORMATION RELATED TO THE
SPECIFIC TREES IDENTIFIED FOR RELOCATION/REMOVAL.
NUMBERING SYSTEM OF TREES APPEARING ON DRAWING
IS BASED ON TREE SURVEY BY URBAN FORESTRY
ASSOCIATES, INC. AND IDENTIFIES TREES WITH A TRUNK
DIAMETER AT BREAST HEIGHT (DBH) GREATER THAN 6".

— 200 Feet Distance from
Corte Madera Creekside Marsh to the West



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4.E Geology, Soils and Seismicity

- 39) The following correction is made to Draft EIR page 4.E-23:

Site constraints include sloped hillside on three sides of the structure which would require retaining walls of up to 25 ~~at least 30~~ feet in height with excavations up to 20 feet.

[D-16-b]

4.F Greenhouse Gases and Climate Change

- 40) Revisions are made to Draft EIR page 4.F-12, following the bulleted list:

Transportation Demand Management (TDM). The existing Marin General Hospital TDM strategies include valet parking, ~~and~~ the provision of shuttle transit services, five carpool spaces onsite, and a benefit program through which employees receive pre-tax transit expense reimbursements. Furthermore, the hospital coordinates with *511 Rideshare*, a San Francisco Bay Area organization that provides assistance to employers relative to travel demand management. Adjustments for TDM strategies were not incorporated into the emissions modeling for the existing and no project scenarios.

[D-13-c]

Service Population. The per capita rate is the existing or increase in annual GHG emissions expressed in metric tons divided by the existing or increase in service population (i.e., number of full time employees). Currently, it is estimated that there are 1,126 employees. With the proposed project, employment would increase to ~~1,412~~ 1,429 people in 2020 and ~~1,552~~ 1,569 people in 2035. BAAQMD policy is that hospital beds or patients (at either the hospital or ambulatory services building) do not count toward the total service population. Therefore, service population is only based on the number of full time employees.

[District Initiated and H-17]

- 41) The first sentence of the last paragraph on Draft EIR page 4.F-14 and corresponding Table 4.F-15 on Draft EIR page 4.F-15 are revised as follows:

In terms of per capita emissions, the proposed project would emit ~~5.3~~ 5.0 metric tons of CO₂e annually per capita in 2020 and ~~2.4~~ 2.0 metric tons of CO₂e per capita in 2035. Although the proposed project per capita emissions would be lower than the existing

conditions per capita emissions of 10.8 metric tons of CO₂e, the proposed project per capita emissions in 2020 would continue to exceed the BAAQMD significance threshold of 4.6 metric tons CO₂e per capita annually.

**TABLE 4.F-5
SUMMARY OF PRE-MITIGATION GHG EMISSIONS**

Scenario	GHG Emissions		
	Annual Emissions (metric tons CO ₂ e /year)	Increase Over Existing Conditions (metric tons CO ₂ e /year)	Per Capita Emissions ^a (metric tons CO ₂ e /year/capita)
Existing conditions in 2010	12,112	--	10.8
No project in 2020	9,620	--	8.5
Proposed project in 2020	13,621	1,508	6.35.0
Proposed project - BAU in 2020	18,386	6,274	24.920.7
Project percent below BAU	25.9 percent	--	--
Proposed project in 2035	12,998	885	2.42.0

^a Per capita emissions for existing conditions and the no project scenario reflect existing or no project emissions divided by the number of existing full time employees. Per capita emissions for the proposed project scenarios reflect the increase in emissions compared to existing conditions divided by the increase in full time employees compared to the existing number of full time employees.

SOURCE: Illingworth & Rodkin, 2012.

[District Initiated and H-17]

- 42) New and expanded TDM strategies for the project are incorporated in Mitigation Measure GHG-2, the TDM strategies portion of which is revised below to replace that shown on Draft EIR page 4.F-15:

Mitigation Measure GHG-2: The Project shall include the following features to reduce energy consumption that could reduce the GHG emissions associated with the proposed project.

- *Additional Transportation Demand Management Strategies.* The project applicant shall implement the following Transportation Demand Management (TDM) program strategies, in addition to maintaining the existing Marin General Hospital valet parking, ~~and~~ shuttle transit service, onsite carpool parking spaces, and pre-tax transit expense reimbursements for employees ~~TDM strategies:~~
 - a) Employee Commute Program. Develop and implement a Marin General Hospital employee commute program with specific actions and goals to provide on-site information to employees about commute alternatives to and from Marin General Hospital. Specific actions shall include the administration of an annual commute behavior survey, implementation of a mandated expanded commuter benefit programs, and periodic incentives to

- promote and encourage commute alternatives to driving alone. Designate an employee transportation coordinator (ETC) to facilitate the program;
- b) Carpool and Vanpool Matching. Provide easy access to carpool and vanpool matching for Marin General Hospital employees, working together with the Metropolitan Transportation Commission (MTC), 511 Rideshare, Transportation Authority of Marin (TAM), or other agency or organization with this objective. Provide a rideshare matching information bulletin board, website or other effective means of facilitating coordination among potential employees interested in ridesharing;
- c) Bicycle Facilities. ~~Provide~~ Incorporate employee access to showers and changing facilities and provide additional secured bicycle parking facilities to encourage bicycle use by Marin General Hospital employees;
- d) Emergency Ride Home. Participate in the countywide Emergency Ride Home (ERH) program administered by TAM for employees who use commute alternatives to driving alone ~~for Marin County employees when it is made available by the County;~~
- e) Expanded Preferential Parking Program. Designate an increased ratio of on-site parking for carpool vehicles (exclusive of elderly and handicapped parking). (The current ratio is approximately one per 120 total on-site spaces – five of 605 spaces.) Clearly indicate the location of the preferential parking spaces using appropriate signage;
- f) Vanpool Program Support. Support and promote the development of employee vanpools countywide, in cooperation with MTC, 511 Rideshare, TAM, and other agencies offering incentive programs, as appropriate.

Implementation Timeframes. ~~Within one calendar year after patient occupancy of the Hospital Replacement Building,~~ The project applicant shall initially submit to the County Department of Public Works (or other department or agency wise as designated by the County) documentation sufficient to demonstrate implementation and effectiveness of each of the aforementioned strategies within the timeframes below. Also, e ~~Each of the strategies, except as specified below, shall also be extended to include employees of the Ambulatory Services Building when that building is operational.~~

At completion of the Hillside Parking Structure (End of Phase I), and annually thereafter: TDM strategies “a” (Employee Commute Program), except the administration of an annual commute behavior survey; “b” (Carpool and Vanpool Matching); “d” (Emergency Ride Home); and “f” (Vanpool Program Support). Except for the administration of an annual commute behavior survey with TDM strategy “a”, each of these strategies are administrative and viable for implementation during construction.

One calendar year after completion of the Hillside Parking Structure (Phase I + 1 Year): Part of TDM strategy “a” (Employee Commute Program) to administer an annual commute behavior survey. This duration allows time for the Employee Commute Program to be established and used before surveying.

– Upon completion of the Ambulatory Services Building (End of Phase III): Part of TDM strategy “c” (Bicycle Facilities) to provide additional secured bicycle parking facilities); and TDM strategy “e” (Expanded Preferential Parking Program).

– Upon patient occupancy of the Hospital Replacement Building (End of Phase IV): Part of TDM strategy “c” (Bicycle Facilities) to provide employee access to showers and changing facilities for expanded bicycle facilities. This TDM strategy involves establishing facilities in the hospital and therefore would not be available until after the Hospital Replacement Building is operational.

[D-23, H-21X, H-31, E-3]

- 43) Table 4.F-6 and the corresponding first sentence in the last paragraph on Draft EIR page 4.F-16 are revised as follows:

**TABLE 4.F-6
SUMMARY OF MITIGATED GHG EMISSIONS**

Scenario	GHG Emissions		
	Annual Emissions (metric tons CO ₂ e /year)	Increase Over Existing Conditions (metric tons CO ₂ e /year)	Per Capita Emissions ^a (metric tons CO ₂ e /year/capita)
Existing conditions in 2010	12,112	--	10.8
Mitigated proposed project in 2020	12,883	771	2.72.5
Proposed project - BAU in 2020	18,386	6,274	21.020.7
Mitigated proposed project in 2020 percent below BAU	29.9 percent	--	--
Mitigated proposed project in 2035	12,304	192	0.450.43

^a Per capita emissions for existing conditions reflect existing emissions divided by the number of existing full time employees. Per capita emissions for the proposed project scenarios reflect the increase in emissions compared to existing conditions divided by the increase in full time employees compared to the existing number of full time employees.

SOURCE: Illingworth & Rodkin, 2012.

Assuming the conservative seven percent TDM reduction and the other measures listed in Mitigation Measure GHG-2, implementation of Mitigation Measure GHG-2 would reduce the annual 2020 net emissions increase to 771 metric tons and would reduce the 2020 per capita emissions to ~~2.72.5~~ metric tons.

[District Initiated and H-17]

4.G Hazards and Hazardous Materials

44) The third paragraph on Draft EIR page 4.G-10 is modified as follows:

Cal/OSHA (8 CCR), like Fed/OSHA (29 CFR) includes extensive, detailed requirements for worker protection applicable to any activity that could disturb asbestos-containing materials, including maintenance, renovation, and demolition. These regulations are also designed to ensure that persons working near maintenance, renovation, or demolition activity are not exposed to asbestos. (Also see *Asbestos*, below.)

[C-5]

45) The following is inserted before the last paragraph on Draft EIR page 4.G-11:

The provisions that cover these operations are found in BAAQMD Regulation 11, Rule 2 (abbreviated to Regulation 11-2), located on their website at (<http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Rules%20and%20Regs/reg%2011/rg1102.ashx?la=en>).

“Regulated Asbestos Containing Material” is defined by the BAAQMD as any material that contains more than one percent asbestos as determined by the methods specified in Section 11-2-603 and that falls into one or more of the following categories:

- Materials that can be crumbled, pulverized, or reduced to powder, when dry, by hand pressure.
- Materials that have been rendered to a crumbled, pulverized, or powdered state, when dry, by crushing, sanding, sawing or shot-blasting or other demolition or renovation techniques.
- Materials in which the asbestos fibers are bound into a matrix, if such materials have been rendered to a powdered state, when dry, by crushing, sanding, sawing or shot-blasting or other demolition or renovation techniques, or by severe weathering.

[C-5]

- 46) The following is inserted in the second full paragraph on Draft EIR page 4.G-21:

The provisions that cover these operations are found in BAAQMD Regulation 11, Rule 2 (abbreviated to Regulation 11-2), located on their website at (<http://www.baaqmd.gov/~media/>)

[C-5]

4.H Hydrology and Water Quality

- 47) The following clarification is made to the bottom of Draft EIR page 4.H-3:

No portion of the project site is mapped in the 100-year flood zone – the “Special Flood Hazard Areas Subject to Inundation by the 1 Percent Annual Chance of Flood.” A northern portion of the project site along Bon Air Road is located within an area classified as “other flood areas”, which includes chance of the 100-year flood, but with depths of less than one foot.

[D-9]

- 48) Figure 4.H-1, Area Flood Zones, on Draft EIR page 4.H-5 is modified to depict the project site boundary, as shown on the following page as Figure 4.H-1R.

[D-11-a]

- 49) The last sentence of the third full paragraph on Draft EIR page 4.H-13 is revised as follows:

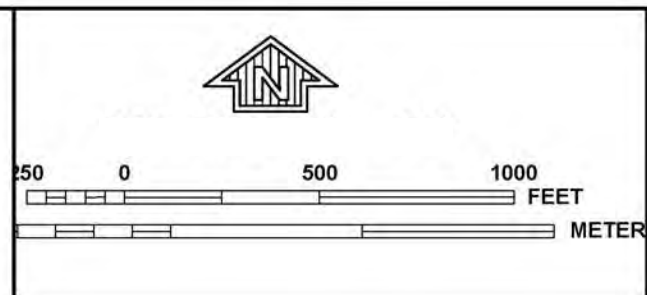
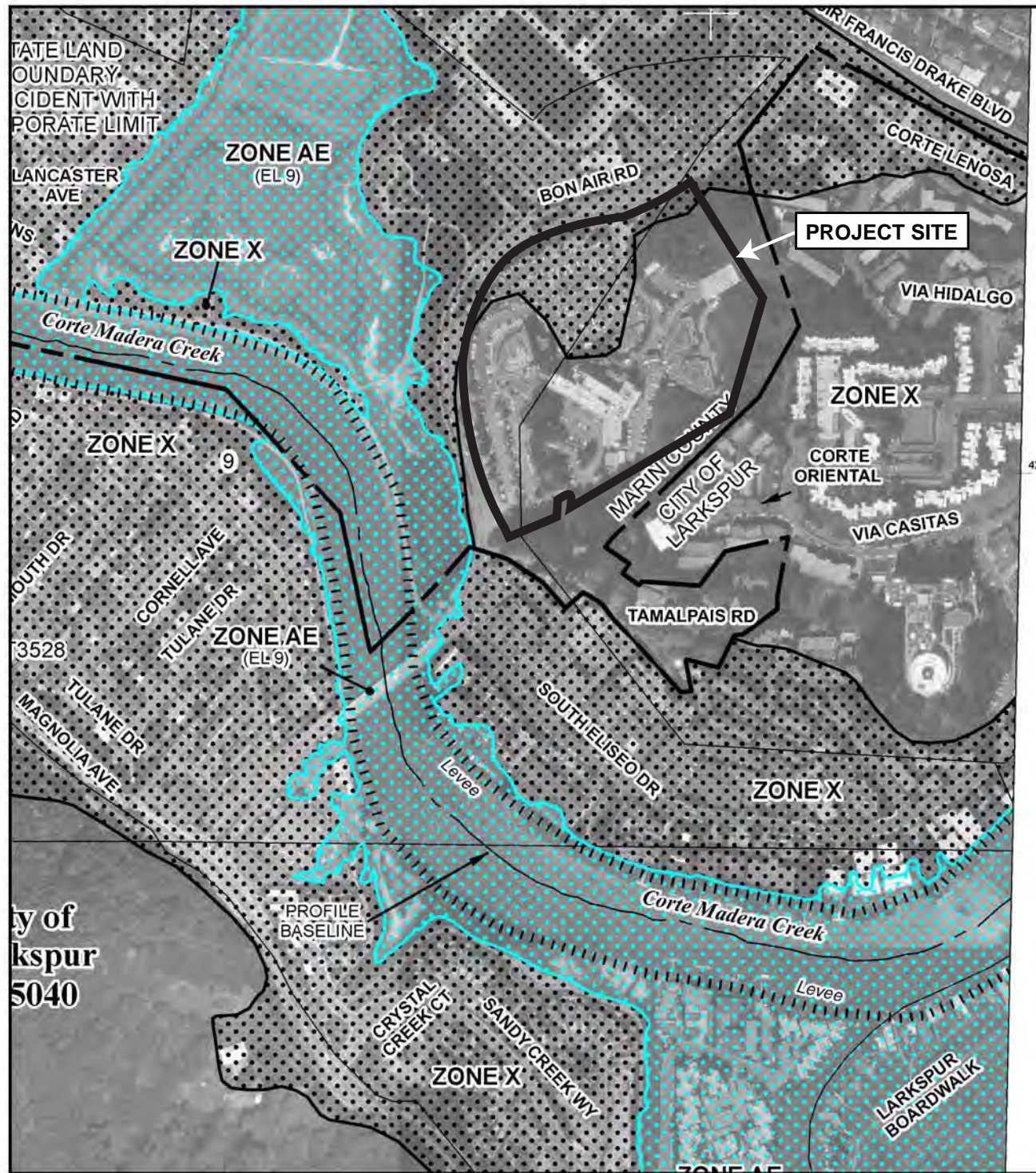
Countywide MCSTOPPP is not the lead for projects where permits are issued in unincorporated Marin.

[D-18-g]

- 50) The first sentence under *Operation* on Draft EIR page 4.H-18 is revised as follows:

The project is replacing 239,124 square feet of impervious surface and creating 9,900,249,024 square feet of impervious surface, which is equivalent to approximately 47 percent of the existing impervious surface on the project site.

[D-18-h]



NFIP PANEL 0458D

FIRM
FLOOD INSURANCE RATE MAP

MARIN COUNTY,
CALIFORNIA
AND INCORPORATED AREAS

PANEL 458 OF 531
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
LARKSPUR, CITY OF	065040	0458	D
MARIN COUNTY	060173	0458	D
ROSS, TOWN OF	060179	0458	D
SAN RAFAEL, CITY OF	065058	0458	D

Notice to User: The Map Number shown below should be used when placing map orders; the Community Number shown above should be used on insurance applications for the subject community.

MAP NUMBER
06041C0458D

EFFECTIVE DATE
MAY 4, 2009

Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov

LEGEND



SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD

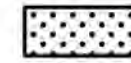
The 1% annual flood (100-year flood), also known as the base flood, is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood. Areas of Special Flood Hazard include Zones A, AE, AH, AO, AR, A99, V, and VE. The Base Flood Elevation is the water-surface elevation of the 1% annual chance flood.

- ZONE A** No Base Flood Elevations determined.
- ZONE AE** Base Flood Elevations determined.
- ZONE AH** Flood depths of 1 to 3 feet (usually areas of ponding); Base Flood Elevations determined.
- ZONE AO** Flood depths of 1 to 3 feet (usually sheet flow on sloping terrain); average depths determined. For areas of alluvial fan flooding, velocities also determined.
- ZONE AR** Special Flood Hazard Area formerly protected from the 1% annual chance flood by a flood control system that was subsequently decertified. Zone AR indicates that the former flood control system is being restored to provide protection from the 1% annual chance or greater flood.
- ZONE A99** Area to be protected from 1% annual chance flood by a Federal flood protection system under construction; no Base Flood Elevations determined.
- ZONE V** Coastal flood zone with velocity hazard (wave action); no Base Flood Elevations determined.
- ZONE VE** Coastal flood zone with velocity hazard (wave action); Base Flood Elevations determined.



FLOODWAY AREAS IN ZONE AE

The floodway is the channel of a stream plus any adjacent floodplain areas that must be kept free of encroachment so that the 1% annual chance flood can be carried without substantial increases in flood heights.



OTHER FLOOD AREAS

- ZONE X** Areas of 0.2% annual chance flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 1% annual chance flood.



OTHER AREAS

- ZONE X** Areas determined to be outside the 0.2% annual chance floodplain.

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- 51) The first three sentences of the second paragraph under *Operation* on Draft EIR page 4.H-18 are revised as follows:

The County ~~MCSTOPPP~~ (within the framework of the Phase II NPDES General Permit) specifically addresses potential stormwater impacts of, among other things, development and redevelopment projects. Potential water quality impacts addressed by the County ~~MCSTOPPP~~ include both construction-related impacts (i.e., short-term impacts) and the equivalent of operational impacts (i.e., long-term, chronic processes and impacts). The potential impacts of the project due to increased stormwater runoff that could convey pollutants to the storm drain system and Corte Madera Creek and that could cause erosion and sedimentation during operation would be adequately addressed by the measures and actions required by the Phase II NPDES permit ~~MCSTOPPP~~. ~~For example, the Phase II NPDES permit specifies a number of requirements for inclusion in a storm water management plan (i.e., in the MCSTOPPP Action Plan 2010), including monitoring and biological assessments. Further, the MCSTOPPP was required to set out a list of Action Plan 2010 describes Best Management Practices (BMPs) as well as measurable goals for the development and implementation of each BMP. The performance standards contained within the MCSTOPPP Action Plan 2010 serve as measurable goals and define compliance per the Phase II General Permit requirements.~~

[D-18-i]

- 52) The last paragraph on Draft EIR page 4.H-18 is revised as follows, per the County's request:

~~In addition~~ Specifically, the County of Marin requires projects subject to Attachment 4 requirements of the Phase II NPDES permit to follow MCSTOPPP's Guidance for Applicants: Stormwater Quality Requirements for Development Projects in Marin County. The Guidance for Applicants describes the required Low Impact Development (LID) approach to compliance with Attachment 4. ~~Potential erosion and sedimentation impacts of the project would be addressed through the Low Impact Design (LID) measures required by the MCSTOPPP.~~ The following Low Impact Design (LID) stormwater treatment measures are proposed as part of the project: flow-through planter boxes, biofiltration swales and infiltration basins, pervious (porous) pavement (e.g., for parking areas). Additionally, potential impacts resulting from hazardous materials contamination during operations would be made less than significant through compliance with stringent regulations for the use and storage of these chemicals and is discussed in greater detail in Section 4.G, *Hazards and Hazardous Materials*. The existing water quality protection measures required of the applicant (e.g., Phase II Permit Attachment 4 compliance) would be sufficient to address potential operation-related (i.e., long-term) water quality impacts that may result from project implementation. No potential operation-related water quality impacts would necessitate implementing measures beyond those already required by the

County and Phase II Permit Attachment 4. Therefore, the potential operation-related water quality impacts would be less than significant.

[D-18-j]

- 53) The following revisions are made starting at the last paragraph on Draft EIR page 4.H-20:

The project would ~~replace and create 249,024~~ 239,124 square feet of impervious surface ~~and would create. However, this would only result in a total increase of~~ 9,900 square feet of impervious surface. This increase in impervious surface area represents approximately two percent of the project total existing impervious project site area. However, a site-specific Storm Drainage Report concluded that peak site runoff volumes would decrease from 266,340 cubic feet per second (cfs) to 265,832 cfs, as a result of implementation of LID design strategies as required by the Marin County NPDES permit and Phase II Permit Attachment 4 (discussed in Impact HYD-1). ~~MCSTOPPP~~ (KFPP, 2011). Peak runoff rates (for a 100-year storm event) would decrease from 53.80 cfs to 48.77 cfs. As discussed in the *Regulatory Setting* above, the ~~MCSTOPPP~~ County requires that the project incorporate LID design or implement strategies for projects on previously developed sites when “5,000 square feet or more of impervious area is created or replaced.” If the impervious area being created or replaced is less than 50 percent of the existing total site area, “the requirements apply only to the addition.” The Marin Healthcare District campus has an existing 530,678 square feet of site area. Of that, the project is proposing to replace 239,124 square feet of impervious area and create 9,900 square feet of new impervious area and is creating and/or replacing a total of 249,024 square feet of impervious surface. Since the project is creating and/or replacing only 47 percent of the existing impervious surface site area, stormwater treatment is provided for only the new and/or replaced impervious surface on the site. In addition to reducing the discharge of stormwater pollutants to the maximum extent practicable, LID design aims to mimic the post-project site hydrology to the pre-project site hydrology. The ~~MCSTOPPP~~ County requires developments to infiltrate runoff or provide facilities to treat stormwater runoff prior to its release from the site in addition to controlling the peak runoff rate and flow volume.

[D-18-r]

4.I Land Use, Plan, and Policies

- 54) The second sentence of the second paragraph on Draft EIR page 4.I-1 is modified as follows:

The project site is located in unincorporated Marin County, in the vicinity of ~~between~~ the unincorporated communities of Kentfield and Greenbrae...

[D-11-b]

4.J Noise and Vibration

- 55) The first sentence of the first full paragraph on Draft EIR page 4.J-3 is modified as follows:

The proposed project would be located in ~~Greenbrae, California, an~~ unincorporated ~~community of~~ Marin County, in the vicinity of the communities of Kentfield and Greenbrae.

Figure 4.J-1, Aerial Photograph Showing Noise Measurement Locations and Site Vicinity, on Draft EIR page 4.J-4 is modified to accurately depict the project site boundary, as shown on the following page as Figure 4.J-4R.

[D-11-a]

- 56) The second sentence of the first paragraph on Draft EIR page 4.J-17 is modified as follows:

Residential uses north, east and south of the site along Via Hidalgo, Spyglass Hill, Corte Oriental, and Bayview Road, conservatively would be as close as ~~200-~~100 feet from major construction activities.

[Comment M-1]



SOURCE: Illingworth & Rocklin, Inc., 2011; and ESA, 2011

Marin General Hospital Replacement Building Project Draft EIR . 210606
Figure 4.J-1R
Aerial Photograph Showing Noise Measurement Locations and Site Vicinity

57) The following section of Table 4.J-9 on Draft EIR page 4.J-20 is modified as follows:

**TABLE 4.J-9R
RANGE OF CONSTRUCTION RELATED NOISE LEVELS BY PHASE (DBA, L_{Eq})**

Construction Phase	Location of Activity (Duration)	Receiver - Distance to Construction	Range of Hourly Average Noise Levels at Nearby Receivers
I	Hillside Parking Structure (2012-2013)	Source Level – 50 feet	71-89
		Via Hidalgo – 200 100 feet	50-77 65-83
		Spyglass Hill – 300 200 feet	55-73 59-77
		Corte Oriental – 400 300 feet	53-74 55-73
		Bayview Road – 900 feet (Shielded by Buildings – 10 dBA reduction)	36-54
		Harvard Drive – 1,500 feet (Shielded by Buildings – 10 dBA reduction)	31-49
		Berens Drive – 1,750 feet	40-58
		Marin Catholic High School - 1,150 feet	44-62
II	Site Preparation and Bon Air Road Parking Structure (2013-2015)	Source Level – 50 feet	71-89
		Via Hidalgo – 550 feet	50-68
		Spyglass Hill – 700 feet (Shielded by Buildings – 10 dBA reduction)	38-56
		Corte Oriental – 850 feet (Shielded by Buildings – 10 dBA reduction)	36-54
		Bayview Road – 850 feet (Shielded by Buildings – 10 dBA reduction)	36-54
		Harvard Drive – 1,000 feet	45-63
		Berens Drive – 1,100 feet	44-62
		Marin Catholic High School - 850 feet	46-64
III	Ambulatory Services Building (2013-2015)	Source Level – 50 feet	75-89
		Via Hidalgo – 550 feet	54-68
		Spyglass Hill – 550 feet (Shielded by Buildings – 10 dBA reduction)	44-68
		Corte Oriental – 400 feet (Shielded by Buildings – 10 dBA reduction)	47-61
		Bayview Road – 575 feet (Shielded by Buildings – 10 dBA reduction)	44-58
		Harvard Drive – 1,050 feet (Shielded by Buildings – 10 dBA reduction)	39-53
		Berens Drive – 1,375 feet	46-60
		Marin Catholic High School - 1,000 feet (Shielded by Buildings – 10 dBA reduction)	39-53
IV	Hospital Replacement Building and Elevated Pedestrian Bridge (2015-2018)	Source Level – 50 feet	75-89
		Via Hidalgo – 900 feet (Shielded by Buildings – 10 dBA reduction)	40-54
		Spyglass Hill – 775 feet (Shielded by Buildings – 10 dBA reduction)	41-55
		Corte Oriental – 325 feet	59-73
		Bayview Road – 175 feet	64-78
		Harvard Drive – 650 feet	53-67
		Berens Drive – 1,450 feet	46-60
		Marin Catholic High School - 1,375 feet (Shielded by Buildings – 10 dBA reduction)	36-50
V and VI	Central and East Wing Renovations (2019-2020) Nursing Unit Infill Project (2023-2025)	Indoor Renovations	NA

[Comment M-1]

- 58) Measures “b” and “e” of Mitigation Measure NOI-2 on Draft EIR page 4.J-19 are revised as follows:

Mitigation Measure NOI-2:

- b) If during construction it is determined that construction noise disrupts on-going hospital operations for workers or patients within patient rooms or existing medical offices, the project shall erect temporary noise control blanket barriers along existing hospital building facades facing the construction area. This mitigation shall be coordinated with Mitigation Measure BIO-4a. The specific location and height of barriers would depend on the extent of the problem indoors. Noise control blanket barriers can be rented and quickly erected to reduce the intrusiveness of construction noise indoors. If construction noise is not problematic and does not disrupt hospital or medical office operations, the temporary noise barriers would not be necessary.
- e) ~~Develop a plan to~~ Relocate patient rooms and sensitive medical offices away from areas undergoing construction, as feasible and practical;

[District Initiated]

- 59) The first four sentences in the fourth paragraph on Draft EIR page 4.J-24 is modified as follows:

Multi-family residences along Via Hidalgo are located approximately ~~100-180~~ feet northeast of the proposed Hillside Parking Structure and would have direct line-of-sight to parking activities on the top level. Residences to the southeast (Spyglass Hill) and south (Corte Oriental) are located ~~280~~ 245 to 400 feet, respectively, from the Hillside Parking Structure. At a distance of ~~280~~ 245 feet from the Hillside Parking Structure, maximum instantaneous noise levels would typically range from ~~42-47~~ 43-48 dBA Lmax. The sounding of the car horn near the edge of the parking structure would yield noise levels ranging from ~~51-59~~ 52-60 dBA Lmax.

[District Initiated]

4.K Population and Housing

- 60) The last sentence on Draft EIR page 4.K-1, are modified as follows:

The project site is located in unincorporated Marin County, in the vicinity of ~~between~~ the unincorporated communities of Kentfield and Greenbrae...

[D-11-b]

- 61) The discussion for Impact POP-1, starting on Draft EIR page 4.K-12, is modified as follows:

The Hospital Replacement Building would employ approximately ~~140~~ 157 more workers than are currently employed at the Marin General Hospital site, and the Ambulatory Services Building would employ approximately 286 new workers at the site (as shown in Table 3-1 of Chapter 3, Project Description), for a total of approximately ~~426~~ 443 new workers. The following assessment is based on reasonable yet fairly conservative assumptions about choices that new employees may make regarding relocating their households to Marin County as a result of becoming newly employed by Marin General Hospital, and about household composition. Thus, this assessment is speculative given the numerous factors regarding choice that cannot be known regarding worker choices.

The residence patterns of existing hospital workers are that 45.6 percent of workers currently both work and live in Marin County (Conley Consulting Group, 2011). However, because there are many possible and unknown factors that contributed to how or when those workers came to work and live in Marin County, this analysis conservatively assumes that all of the new employees would ~~not~~ be considered new population moving to Marin County. (This is a conservative assumption since some new employees would choose to relocate to Marin County.) Therefore, the project would induce population growth as a result of ~~426~~ 443 new workers, and in some cases, their families, moving to the area.

Marin County recognizes that there is typically more than one worker per household (1.65 workers per worker household), and that both workers do not work at the same location/employer (MTC, 1998). However, again, this analysis conservatively assumes that each new worker will create a new household in Marin County. Marin County also has a current average of 2.43 persons per household (Conley Consulting Group, 2011), which is projected to remain roughly the same through the 2035 projection period according to ABAG. Therefore, a total population increase of approximately ~~1,036~~ 1,076 persons is conservatively estimated to occur in the area as a result of the project.¹

The new population growth resulting from the project would be due to individual employees making individual decisions on where to relocate in the general project vicinity, which would not necessarily be limited to the Ross Valley, but anywhere within Marin County. The population growth of approximately ~~1,036~~ 1,076 new residents would represent 1.9 percent of the 2010 population of Ross Valley cities (55,900) and approximately ~~49.0~~ 51.2 percent of the population growth ABAG projects for Ross Valley cities over the next 25 years (2,100); it would represent 0.4 percent of the 2010 population of Marin County (256,500) and ~~5.86~~ 0 percent of the population growth ABAG projects for the county over the next 25 years (17,800). (See Ross Valley Cities and Marin County population in Table 4.K-3.)

Considering the projected population growth in the county represented by these potential new residents, the population growth induced as a consequence of project employees moving to the area would not be substantial or likely concentrated. Because the project does not include the extension of roads or other major infrastructure needed to support urban growth, it would not induce growth indirectly by removing a barrier to growth. Therefore, in summary, the project would not induce substantial population growth and the impact would be less than significant. (See Section 6.3, *Growth Inducement*, in Chapter 6, Impact Overview and Growth Inducement, for a discussion of the project's growth inducing effects related to housing and housing availability.)

Mitigation: None required

¹ ~~426,443~~ new households times 2.43 average persons per household equals ~~1,036,1,076~~ persons.

[District Initiated and H-17]

- 62) The first paragraph of the discussion for Impact POP-2, starting on Draft EIR page 4.K-14, is modified as follows:

As discussed under *Local Setting* above, the Countywide Plan includes projections of future growth potential for the unincorporated area as a whole (shown in Table 4.K-4, above). Although the project does not propose new housing, the jobs it would generate could indirectly generate approximately ~~1,036,1,076~~ new residents in Marin County, as discussed under Impact POP-1 above. The addition of ~~1,036,1,076~~ new *residents* would be well within the remaining population growth potential based on the Countywide Plan's theoretical buildout population and the county's 2010 population. As shown in Table 4.K-4, the theoretical buildout assumes the addition of 27,563 residents in the county relative to its 2000 population. A population increase of ~~1,036,1,076~~ as an indirect consequence of the new jobs provided by the project would represent ~~1,83.9~~ percent of the county's population growth potential under the Countywide Plan.

[District Initiated and H-17]

4.L Public Services and Recreation

- 63) The first paragraph of the Impact PSR-3 discussion on Draft EIR page 4.L-15 is modified as follows:

The proposed project would not develop new residential uses, and therefore, would not directly generate new student enrollment in school districts in Marin County. However, as described in Section 4.K, *Population, Housing, and Employment*, the proposed

project would result in approximately ~~426~~ 443 new households in the area (conservatively, one created by each new employee at the project). By applying the SAB student generation rate of 0.7 students per household this would result in approximately ~~298~~ 310 new students in Marin County school districts. As discussed in *Setting*, above, Marin County districts in the vicinity of the project are experiencing an overall trend of increasing enrollment. The increase of ~~298~~ 310 additional students could incrementally contribute to the need for new school facilities.

[District Initiated and H-17]

- 64) The first two paragraphs of the Impact PSR-4 discussion on Draft EIR page 4.L-16 is modified as follows:

The proposed project would result in a population increase of approximately ~~1,036~~ 1,076 new persons (based on the conservative assumption that each new worker would create a new household in Marin County, at the average county rate of 2.43 persons per household) (see Section 4.K, Population, Housing, and Employment). This new population is assumed to reside not only in the Ross Valley Area but anywhere within Marin County.

This anticipated increase could result in a small increase in use of parks and recreational facilities. The park standard referenced in the Marin Countywide Plan is 5 acres per 1,000 residents or 10 acres per 1,000 residents. Marin County currently has 932 acres and 252,409 resident (MCCDA, 2007; U.S. Census Bureau, 2011), resulting in a ratio of 3.7 acres per 1,000 residents. Marin County does not have an objective regarding open space, but the County currently maintains 73.3 acres of open space per 1,000 residents. The addition of ~~1,036~~ 1,076 potential new residents would change ~~not change any of these ratios by 0.02 points (essentially zero); and their therefore, the~~ impact on parkland objectives would be less than significant.

[District Initiated and H-17]

- 65) The first sentence of the first paragraph of the Impact PSR-5 discussion on Draft EIR page 4.L-17 is modified as follows:

The project would result in an increase in daytime on-site population, comprised primarily of ~~426~~ 443 new employees (see Section 4.K, *Population, Housing, and Employment*)...

[District Initiated and H-17]

- 66) The first sentence of the second paragraph of the Impact PSR-5 discussion on Draft EIR page 4.L-17 is modified as follows:

Hospitals operate 24 hours with multiple shifts ~~are 24 hours,~~ so not all of the ~~426~~ 443 new employees would be working during the daytime.

[District Initiated and H-17]

4.M Transportation and Circulation

- 67) The first sentence of the third paragraph on Draft EIR page 4.M-1 is modified as follows:

The project site is located at 250 Bon Air Road in unincorporated Marin County, in the vicinity of the communities of Kentfield and Greenbrae, California.

[D-11-b]

- 68) The following text is added to the second sentence on Draft EIR page 4.M-26:

On the basis of 59 new beds to be added to the current ~~average daily census (ADC)~~ of 148 beds in use by Year 2018, and 28 beds to be added by Year 2035 (for a total of 235 beds), plus a new 100,000 square-foot ambulatory services building, the proposed project would generate about 4,440 daily trips ...

[H-3]

- 69) The first sentence of the last paragraph on Draft EIR pages 4.M-28 and 4.M-34 is revised as follows:

As described more-fully below (see Impact TRA-4), the existing Marin General Hospital Travel Demand Management (TDM) program includes the use of valet services, ~~and~~ shuttle transit service, onsite carpool parking spaces, and pre-tax transit expense reimbursements for employees.

[D-13-c]

- 70) The following is inserted after the first full paragraph on Draft EIR page 4.M-46, as part of Impact TRA-6:

Although the project’s impact on intersection operations during construction would be less than significant and therefore not warrant mitigation, the County of Marin Department of Public Works recommends that the project applicant develop project measures to reduce employee and construction worker traffic at peak drop-off (generally 7:30-8:15 a.m.) and pick-up (generally 3:00-3:30 p.m.) periods at Marin Catholic High School. In response, the District will employ the following:

Recommendation: To substantially reduce vehicle trips associated with construction workers for the proposed project that would conflict with peak high school traffic, the project applicant shall limit that (1) construction work shifts start no later than 7:00 a.m., excepting work shifts involving “noise generating activities,” which are restricted by Mitigation Measure NOI-2 (consistent with the Marin County Municipal Code) from starting before 8:00 a.m.; and (2) construction work shifts end before 2:30 p.m. or after 3:30 p.m. Also, at the start of each stage of construction activity, the construction manager shall encourage all construction contractors, especially those involving large trucks, to avoid the peak morning drop-off period (generally 7:30-8:15 a.m.) and evening pick-up period (generally 3:00-3:30 p.m.), as feasible and practical.

[District Initiated, D-24]

- 71) This requirement is added to Mitigation Measure TRA-7 on page 4.M-52 of the Draft EIR as follows (revisions shown below also address response to Comment D-25):

Mitigation Measure TRA-7: If the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement project circulation improvement for Sir Francis Drake Boulevard (eastbound through lane at Eliseo Drive) is deemed feasible, the project applicant shall contribute a proportional “fair share” contribution towards that improvement, based on the project’s percent contribution to the total cumulative year 2035 plus project volume at the intersection.

The project applicant shall contribute a proportional “fair share” towards the upgrade of A70 traffic signal controllers along Sir Francis Drake Boulevard at the affected intersections at the Wolfe Grade, La Cuesta, and Eliseo Drive intersections based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections.

The project applicant shall contribute a proportional “fair share” towards an engineering study to evaluate the potential for increasing the westbound left-turn lane storage based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections the Bon Air Road/Sir Francis Drake Boulevard intersection.

There are no additional feasible measures to mitigate the project impact at the other identified intersections to a less-than-significant level.

Significance after Consideration of Mitigation Measure: Significant and Unavoidable

[Comments D-20 and D-25]

72) The following revisions are made starting on Draft EIR page 4.M-55:

The planned 100,000 square-foot ambulatory services building would require an additional 286 FTE employees. However, because the County of Marin's parking code requirement for the proposed ambulatory services building (based on square footage) is being used as a conservative measure for parking demand calculations, associated FTE's were not added to employee totals. Under year 2018, 17 FTE employees would be added with the Hospital Replacement Building.

Based on the above uses, the proposed project's year 2018 parking demand was calculated as follows in **Table 4.M-16** using the same parking rates used to calculate existing parking demand:

**TABLE 4.M-16
YEAR 2018 PARKING DEMAND**

Planned Employees/Uses	Parking Rate	Parking Spaces
4,126 <u>1,143</u> FTE (Hospital)	0.55 spaces/employee	622 <u>629</u>
18,417sq.ft. Health/Human Services	4.15 spaces/1,000 sq.ft.	76
100,000sq.ft. of Ambulatory Service Building	4.0 spaces/1,000 sq.ft.	400
	Total Peak Parking Demand	4,098 <u>1,105</u> spaces

Based on Year 2018 parking demand, the proposed project would have a calculated peak parking demand of ~~4,098~~ 1,105 spaces. The proposed total supply of 1,079 spaces would result in a parking deficit of ~~1,926~~ spaces.

It is recommended that the Marin Healthcare District continue its present arrangement and enter into a long-term shared parking agreement with the St. Sebastian's Church located just northwest of the campus off Bon Air Road. A long-term agreement would secure an additional 90 parking spaces for employee use, which would reduce the parking and provide an essentially equal parking supply (only a three space deficit to 14 spaces). ~~An agreement would provide ample parking supply to accommodate projected demand.~~

The church parking lot would continue to be served by hospital shuttle services. By obtaining a long-term parking agreement with St. Sebastian's Church, overall peak

project parking demand would be accommodated by supply. Marin Healthcare District has had a relationship with St. Sebastian's Church since 1990, when the first parking lease was executed between it and Marin General Hospital. The hospital's current lease continues to 2018, and the District has an option to extend it ~~one year~~ to June 30, 2021.

Cumulative Year 2035 Parking Analysis

Under Cumulative Year 2035 plus Project conditions, the total campus parking demand would reflect an increase of 140 FTE hospital employees from year 2018 levels, above. These additional 140 FTE employees are not associated with Ambulatory Services Building uses. Consistent with year 2018 conditions, overall parking demand would be made up of existing and proposed uses including FTE employees, Ambulatory Services Building, Health and Human Services Building, and departure of the Marin Clinic. These would include the following components:

- ~~+1,266~~ +1,283 FTE employees (existing plus Hospital Replacement Building);
- + 18,417 square feet Health/Human Services (existing);
- + 100,000 square feet of ASB uses (proposed);
- - 8,000 square feet Marin Clinic (removed).

Based on the above uses, the proposed project's year 2035 parking demand was calculated as follows in **Table 4.M-17** using the same parking rates used to calculate existing parking demand:

**TABLE 4.M-17
YEAR 2035 PARKING DEMAND**

Planned Employees/Uses	Parking Rate	Parking Spaces
4,226 <u>4,283</u> FTE (Hospital)	0.55 spaces/employee	696 <u>707</u>
18,417 sq.ft. Health/Human Services	4.15 spaces/1,000 sq.ft.	76
100,000 sq.ft. of Ambulatory Service Building	4.0 spaces/1,000 sq.ft.	400
	Total Peak Parking Demand	4,472 <u>4,183</u> spaces

Under Cumulative Year 2035 plus Project Conditions, the proposed project would have a calculated peak parking demand of ~~4,472~~ 4,183 spaces. The proposed total supply of 1,079 spaces would create a parking deficit of ~~93~~ 104 spaces. As discussed under Year 2018 conditions, it is recommended that Marin Healthcare District continue its present arrangement and enter into a long-term shared parking agreement with the St. Sebastian's Church to secure an additional 90 parking spaces for employee use, which would reduce the parking and provide an essentially equal parking supply (only a three space deficit to 14 spaces). ~~An agreement would provide ample parking supply to accommodate projected demand.~~

Comparison with Existing Conditions

The above analysis identifies on-site deficits of ~~49-26~~ parking spaces in 2018 (~~1,098~~1,105-space demand versus 1,079-space supply), and ~~93-104~~ spaces in 2035 (~~1,172~~1,183-space demand versus 1,079-space supply). While it is recommended to continue leasing 90 spaces from St. Sebastian's Church, those additional spaces cannot be permanently guaranteed. In addition, Mitigation Measure TRA-2a recognizes that up to five on-street parking spaces along Bon Air Road might be eliminated to accommodate the new driveway. By comparison, there currently is an on-site parking deficit of 128 spaces (733-space demand versus 605-space supply). Thus, even without the St. Sebastian's lot and the five on-street spaces, the project would represent a net improvement over current conditions, with fewer employees and visitors using off-site parking spaces in the neighborhood. In addition, the estimates of future demand do not take into consideration TDM measures (e.g., carpooling) that are expected to reduce single-occupancy vehicle trips and lower the parking deficit.

[District Initiated and H-17]

4.N Utilities and Service Systems

- 73) The second sentence of the second paragraph on Draft EIR page 4.N-1 is modified as follows:

Although the right-of-way was relocated, the gravity sanitary sewer line ~~and force main~~, domestic water main, and high pressure gas main remain in the original right-of-way (herein referred to as "old Bon Air Road right-of-way") within an existing public utility easement for access to these utilities.

[C-4]

- 74) The *Existing Sewer Lines* discussion starting on Draft EIR page 4.N-2 is modified as follows:

Existing Sewer Lines

RVSD has existing sanitary sewer infrastructure located within the boundaries of, upstream (south) and downstream (east) of the project site. In the project vicinity, RVSD owns and maintains an upstream pumping station, an existing ~~42~~eight-inch sewer service line that transects through the center of the project site, and an eight-inch diameter pressure pipe (force main) that is a bypass line, a force main discharge manhole, and a gravity sewer system with 12-inch diameter sewer main and manholes located on the north corner of the existing parking lot where the Bon Air Parking Structure is proposed, in front of the project site in Bon Air Road, and in Bon Air Road

downstream of the project site. The upstream pumping station is RVSD Pumping Station #25, located within the old Bon Air Road right-of-way, near the southern access driveway (KPF, 2011a). The eight-inch force main is not regularly used but is under pressure and drains into ~~an eight-inch~~ the 12-inch gravity line ~~that is also located~~ in the right-of-way. RVSD Pumping Station #25 pumps an average of 0.70 mgd, and has a wastewater capacity of 1.41 mgd (RVSD, 2007). Four- to six-inch lateral sanitary sewer gravity lines are also located throughout the project site, and these lines are owned and maintained by the Marin Healthcare District.

[C-4]

- 75) The *Infrastructure* discussion starting on Draft EIR page 4.N-13 is modified as follows:

Infrastructure

As shown in Table 3-3, Required Utility Infrastructure by Project Building (see Chapter 3, Project Description), sanitary sewer is required for the Hospital Replacement Building and the Ambulatory Services Building only. The project would require the relocation of about 580 linear feet of the existing 12-inch sanitary sewer line into the Bon Air Road right of way, which will require an application for, granting of, and compliance with a Public Sewer Extension (PSX) permit from RVSD, a RVSD-granted public utility easement (as discussed in more detail in Impact UTIL-5, below) since the line is owned and maintained by the RVSD. The extension of the line into the right-of-way is intended to avoid disruption to the driveway if future work on the line is required.

Pursuant to the PSX permit, the design and construction of the sewer lines must be prepared and installed and tested per the then-current RVSD Standard Specifications and Drawings. All required easements shall be RVSD standard 15 feet on center of pipe. RVSD will require an engineered design; including pipe alignment, pipe capacity, and trench detail; and evaluation of potential pump station improvements due to the change in force main length and discharge conditions, which the project will submit to RVSD for review as part of the PSX permit application. In addition, the sewer design will include the evaluation of approximately 625 feet of existing gravity sewer main downstream of the force main discharge manhole on the project site to the connection to the trunk sewer at 350 Bon Air Road and Via Hidalgo. The change in the force main discharge location and increased sewer flows from the project may require upgrading this existing gravity sewer main system on the property and in Bon Air Road as part of the PSX permit.

The extension of the line into the right of way is intended to avoid disruption to the driveway if future work on the line is required. The applicant also would be required to apply for a new Sewer Connection Permit with RVSD to perform work on existing private sewer laterals, file an Application of Capacity with RVSD to connect to

~~RVSD's sewer collection system and treatment plant.~~ RVSD regulations do not allow a building to be built over a sanitary line. RVSD also owns and maintains the sanitary sewer line through the project site, therefore a new easement would be required from the point of connection at the existing line, near the existing Community Mental Health Building, to the public right of way (as further described in Impact UTIL-5). The timing for work within the old Bon Air Road right-of-way would be dependent on overall project permit approvals with all the jurisdictional agencies and final project phasing. Sanitary sewer service would be operational and unobstructed during the relocation process. Upon completion and approval of the realigned sanitary sewer facilities, the existing sewer line would be decommissioned and removed per RVSD standards. ~~The existing force main would be altered but not realigned.~~

[C-3, C-7 through C-9]

- 76) The top of Draft EIR page 4.N-14 is modified as follows:

The project will ensure that RVSD maintains daily routine as well as 24-hour emergency access to the pump station (PS25) at 1350 South Eliseo Drive (intersection with Bon Air Road) and the access route for the Kentfield Force Main and PS 15 Kentfield Pump Station from Bon Air Road at South Eliseo Drive along the path on the south side of Creekside Park (the Corte Madera Creek pathway). All access points to the path, and the path itself, will remain accessible to RVSD and emergency vehicles throughout construction of the project.

[C-6]

- 77) Figure 4.N-2, A Proposed Utility Lines, on Draft EIR page 4.N-4 is modified to remove proposed bioswales in the Bon Air Road median, as shown on the following page as Figure 4.N-2R.

[D-18-d, D-18f, D-30-a]

- 78) The following bullet is added to “Phase IVb” on Draft EIR page 4.N-24:

– Proposed relocation of the existing bus stop adjacent to the West Wing (existing south parking lot) to northbound Bon Air Road, in front of the Hospital Replacement Building (see Figure 3-5).

[District Initiated]



LEGEND:

PROPOSED DOMESTIC WATER LINE	
PROPOSED ELECTRIC LINE	
PROPOSED FIRE WATER LINE	
PROPOSED SANITARY SEWER LINE	
PROPOSED TELEPHONE/DATA CABLE LINE	
PROPOSED STORM DRAIN LINE	
PROPOSED HIGH VOLTAGE LINE	
PROPOSED GAS LINE	
PROPOSED JOINT TRENCH	
PROPOSED PUBLIC GAS LINE	
PROPOSED PUBLIC WATER LINE	
PROPOSED PUBLIC SANITARY SEWER LINE	
PROPOSED PUBLIC ELECTRIC LINE	
PROPOSED PUBLIC HIGH VOLTAGE LINE	
STORM DRAIN CLEANOUT	
SANITARY SEWER CLEANOUT	
STORM DRAIN MANHOLE	
SANITARY SEWER MANHOLE	
PAVEMENT IMPERVIOUS	
SWALE/FLOW THROUGH PLANTER	

SOURCE: KPFF, Inc.

Marin General Hospital . 210606
Figure 4.N-2R
 Proposed Utility Lines

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79) The following bullet is added to “Phase V of VI” on Draft EIR page 4.N-24:

- Proposed installation of two new bus stops along southbound Bon Air Road, near the north and south access roads (see Figure 3-5).

[District Initiated]

Chapter 5, Alternatives

80) The following discussion for Alternative 1.2 on Draft EIR page 5-16 is modified as follows:

Parking. Although not addressed as an impact under CEQA, the calculated parking demand for No Project Alternative 1.2 would be 1,133 spaces (compared to ~~1,079~~1,183 for the project) (see Appendix G to this EIR); although there would be fewer employees on the site with No Project Alternative 1.2, the parking rate for medical office (of which there would be an additional 45,000 square feet compared to with the project) is higher than that applied to employees. Since no new parking structures would be constructed, the existing parking supply of 605 on-site parking spaces (or 768 spaces including existing satellite lots and adjacent on-street parking) would be available to serve this “no project” scenario. Therefore, there would be a 528 space parking deficit (or 365 including satellite lots and adjacent on-street parking) at 2018 (compared to the ~~492~~6-space deficit with the project).

[District Initiated and H-17]

81) The following discussion for Alternative 2, starting on Draft EIR page 5-23, is modified as follows:

Parking. Although not addressed as an impact under CEQA, Alternative 2 would have a 57-space parking surplus (compared to a ~~492~~6-space deficit with the project) at 2018, and a 17-space parking deficit (compared to a ~~93~~104-space deficit with the project) at 2018 and 2035, respectively. Like the project, with Alternative 2 Marin Healthcare District would continue its present arrangement and enter into a long-term shared parking agreement securing an additional 90 parking spaces for employee use. This, which would eliminate Alternative 2’s the 17-space deficit in 2035 and create a 73-space surplus (compared to a ~~314~~14-space deficit with the project). The church parking lot would continue to be served by Marin General Hospital Campus shuttle services.

[District Initiated and H-17]

- 82) The following discussion for Alternative 3, starting on Draft EIR page 5-30, is modified as follows:

Parking. Although not addressed as an impact under CEQA, the calculated parking demand for Alternative 3 would be 698 spaces (compared to ~~1,098~~1,105 for the project) in Year 2018, and 772 spaces (compared to ~~1,172~~1,183 for the project) in Year 2035 (see Appendix G to this EIR).

In both years, with the 507-space Bon Air Parking Structure and existing on-site surface lots, this Alternative would have a 667-space parking supply (compared to 1,079 with the project). Therefore, Alternative 3 would experience a 31-space parking deficit in Year 2018 (compared to a ~~1926~~-space deficit with the project), and a 105-space parking deficit in Year 2035 (compared to a ~~93104~~-space deficit with the project). As with the project, Marin Healthcare District would continue its present arrangement and enter into a long-term shared parking agreement securing an additional 90 parking spaces for employee use, which would result in a 15-space deficit at buildout (compared to a ~~314~~-space deficit with the project). The church parking lot would continue to be served by Marin General Hospital Campus shuttle services.

[District Initiated and H-17]

- 83) The following discussion for Alternative 4, starting on Draft EIR page 5-37, is modified as follows:

Although not addressed as an impact under CEQA, the calculated parking demand for Alternative 4 would be 1,108 spaces (see Appendix G to this EIR) (compared to ~~1,172~~1,183 for the project) for Year 2035. The 412-space Hillside Parking Structure and a reduced 392-space Bon Air Road Parking Structure would be developed with Alternative 4. Given the remaining parking supply of 160 on-site parking spaces (that would not be displaced by the proposed development with Alternative 3), there would be a 964 space parking supply. This parking supply would result in a 144-space parking deficit (compared to the ~~93104~~-space deficit with the project). As with the project, with Alternative 4 Marin Healthcare District would continue its present arrangement and enter into a long-term shared parking agreement securing an additional 90 parking spaces for employee use, which would reduce the deficit to 54 spaces (compared to a ~~314~~-space deficit with the project). The church parking lot would continue to be served by Marin General Hospital Campus shuttle services.

[District Initiated and H-17]

- 84) The third sentence under *Non-CEQA Design Alternatives* on Draft EIR page 5-41 is modified as follows:

To the extent that any of the options do so, they are discussed here for the benefit of the public, other public agencies, and ~~City~~ decision-makers who will ultimately consider the merits of the project, including matters of policy and design.

[District Initiated]

Chapter 6, Impact Overview and Growth Inducement

- 85) The last sentence of the first paragraph on Draft EIR page 6-3 is modified as follows:

Overall the workforce on the project site would increase by about ~~426-443~~ employees.

[District Initiated and H-17]

- 86) The last paragraph starting on Draft EIR page 6-3 is modified as follows:

The project would add about ~~426-443~~ new jobs at the project site. This number of jobs represents 1.6 percent of the 27,200 jobs in Ross Valley cities and 0.3 percent of the total 143,780 jobs in Marin County (see Table 4.K-3 in Section 4.K, *Population, Employment, and Housing*). The addition of this many new jobs in the project area would not result in a substantial amount of growth or growth beyond that projected to occur in the county. As discussed under Impact POP-1 in Section 4.K, *Population, Employment, and Housing*, the conservative estimate of population growth of the ~~1,036,076~~ persons that would result from all ~~426-443~~ new project employees moving to the area would not be substantial in that it would not result in induced population growth beyond that assumed in Association of Bay Area Governments (ABAG) projections and the Marin Countywide Plan. It is very possible that some of the new workers already reside in Marin County or that some might relocate from distant places to nearby counties other than Marin. This conservative potential contribution of ~~1,036,076~~ new persons to the existing Bay Area population (7,341,700) would not be substantial or induce undue growth beyond that assumed in ABAG projections for the region over the next 25 years (1,732,000) – less than 0.01 percent in both cases.

[District Initiated and H-17]

- 87) The last sentence of the second paragraph, and the first three sentences of the third paragraph, on Draft EIR page 6-5 are modified as follows:

Conley’s methodology and conclusions are summarized below and differs from that presented in the analysis in Section 4.K, *Population, Housing and Employment*, in Chapter 4 of this Draft EIR in that it assumes all ~~426-443~~ new workers would be new to the area (i.e., none currently reside in Marin County).

The estimate of housing demand generated by the project recognizes that each of the ~~426-443~~ new workers does not represent a new household. The number of households needed by the ~~426-443~~ new workers to the area was estimated based on data from the Metropolitan Transportation Commission (MTC) that indicates that there is an average of 1.65 workers per working household in Marin County (MTC, 1998). Applying this factor to the ~~426-443~~ new workers yields ~~257,268~~ new households represented by the project jobs/new workers (Conley Consulting Group, 2011).

[District Initiated and H-17]

- 88) Table 6.2-2 and the corresponding text starting at the bottom of Draft EIR page 6-6 are modified as follows:

**TABLE 6.2-2
HOUSING NEEDS GENERATED BY PROJECT**

	Very Low (0-50% of AMI)	Low (51-80% of AMI)	Moderate (81-120% of AMI)	Above Moderate (over 120% of AMI)	Total
Housing Needs of Project Employees ^a	4548	6465	4548	403107	257268
RHNA Allocation for Lower Ross Valley Cities (Larkspur and Corte Madera) ^b	158	93	121	254	626
RHNA Allocation for Unincorporated County	183	137	169	284	773

NOTE: AMI = area median income

^a Conservatively assumes all new employees would be new to Marin County.

^b Conservatively assumes all new households would be established in the Lower Ross Valley area.

SOURCES: Marin County Community Development Agency, 2007 (Table 3-55).
ABAG, 2008, Marin County 2009

The project would have demand for ~~154,161~~ units affordable to very low, low, and moderate-income workers, and ~~403,107~~ units affordable to above moderate income workers. Given that, as discussed above and shown in Table 6.2-2, the entire demand for affordable units generated by the project is well within the County’s RHNA

allocation; the ~~257~~268 residual units demanded would be accommodated by the RHNA allocation. As a result, the project's growth inducing effects related housing demand, and more specifically its demand for affordable housing, would be less than significant.

[District Initiated and H-17]

**TABLE 2-1R
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Aesthetics		
<p>Impact AES-1: The Project would have a substantial adverse effect on one scenic vista as seen from the Corte Madera Creek pathway. (Potentially Significant)</p>	<p>Mitigation Measure AES-1: The applicant shall add taller tree cover west of the Hospital Replacement Building to “break” up the building’s west facing facade, as seen from the Corte Madera Creek pathway looking east. In addition to the proposed relocated palm trees and deciduous trees proposed along the west portion of the project site, three to four tall evergreen conifers, such as redwoods or other tree of similar height and shape (e.g., columnar with a tall trunk without dense low branch cover) shall be added to the proposed landscape plan and installed prior to completion of the Hospital Replacement Building. These additional trees shall be adequately spaced in the area between the building and the west edge of the project site to prevent full blockage of views toward Corte Madera Creek, Creekside Marsh, Hal Brown Park and/or views Mt. Tamalpais from hospital rooms. Prior to Design Review approval of the Hospital Replacement Building, the applicant shall present the final landscape plan to the County for conformance review with this measure.</p>	<p align="center">Less than Significant</p>
<p>Impact AES-2: The Project would not substantially damage scenic resources or natural viewsheds, but could result in substantial changes to the natural terrain visible from public viewpoints. (Potentially Significant)</p>	<p>Mitigation Measure AES-2: The most visible area of retaining walls along the south access road shall be altered by “stepping” the retaining walls on the hillside for the area that is within 250 feet of Bon Air Road. This shall only apply when retaining walls exceed five feet in height. The “steps” of the retaining walls shall be at least two feet in depth to allow planting areas, and the retaining wall heights shall be no greater than five feet. Evergreen plantings shall be added in the stepped portions of the walls to create a partially vegetated and more naturalized slope, more consistent with the existing vegetated area visible south of the proposed retaining wall, compared to 90-degree-vertical retaining walls with no vegetation. Prior to Design Review approval of the Hospital Replacement Building, the applicant shall present the final south access road retaining walls and planting plans to the County for conformance review with this measure.</p>	<p align="center">Less than Significant</p>
<p>Impact AES-3: The Project would not substantially degrade the existing visual character of the project site or its surroundings, would not change the visual quality of the region, or eliminate significant visual resources. (Less than Significant)</p>	<p>None required</p>	
<p>Impact AES-4: The Project would not create a significant increase in light and glare that would adversely affect nighttime views in the area. (Less than Significant)</p>	<p>None required</p>	
<p>Impact AES-5: The Project would not significantly reduce sunlight or introduce shadows in areas used extensively by the public. (Less than Significant)</p>	<p>None required</p>	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Aesthetics (cont.)		
Impact AES-6: The Project would not conflict with the County goals and policies related to visual quality, or other applicable aesthetic or visual policies or standards. (Less than Significant)	None required	
Impact AES-7: The Project, combined with past, present and other reasonably foreseeable future development in the area, would not cause cumulative aesthetics impact. (Less than Significant)	None required	
Air Quality		
Impact AIR-1: The Project could conflict with or obstruct implementation of the applicable air quality plan. (Less than Significant)	None required	
Impact AIR-2: Construction of the Project would result in short-term construction equipment exhaust emissions that could contribute to existing or projected air quality standard violations. (Potentially Significant)	<p>Mitigation Measure AIR-2: The measures listed below to control diesel exhaust emissions associated with demolition, grading and new construction shall be implemented. These measures shall apply to all phases even though the only potential exceedance of a threshold is in 2015 (or through Phase III):</p> <ol style="list-style-type: none"> 1. Prior to the commencement of construction activities, the developer or contractor will provide a plan for approval by the District or BAAQMD demonstrating that the heavy-duty (>50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction. The NOx reduction will be based on a comparison to URBEMIS2007 emissions estimates for this project (see Appendix C to this Draft EIR). This plan will address all equipment that will be on site for more than two working days. 2. Diesel particulate filters (or features that provide equivalent level of PM2.5 emissions reductions) shall be installed on all diesel-powered equipment with engines larger than 50 horsepower that will be working on the site for more than two working days. These features are anticipated to provide at least a 45-percent reduction in PM_{2.5} exhaust emissions. 3. During building construction, establish on-site electric power to reduce the use of diesel-powered generators. 4. Arrange for service to provide on-site meals for construction workers to avoid travel to off-site locations. 5. Stage construction equipment at least 200 feet from existing or new habitable residences. 	Less than Significant

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Air Quality (cont.)		
Impact AIR-2 (cont.)	<p>6. Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes in accordance with the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations. Clear signage will be provided for truck operators and construction workers at all access points.</p> <p>7. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications. All equipment will be checked by a certified mechanic and determined to be running in proper condition prior to operation.</p> <p>8. Require an on-site disturbance coordinator to ensure that the construction period mitigation measures are enforced. This coordinator will respond to complaints regarding construction activities and construction caused nuisances. The phone number of this disturbance coordinator will be clearly posted at the construction site and provided to nearby residences. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. A log documenting any complaints and the timely remedy or outcome of such complaints will be kept.</p>	
Impact AIR-3: Construction of the Project would result in short-term generation of fugitive dust that could contribute to existing or projected air quality standard violations. (Potentially Significant)	<p>Mitigation Measure AIR-3: The contractor shall implement the following BAAQMD recommended basic fugitive dust mitigation measures:</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 	Less than Significant
Impact AIR-4: The Project would result in long-term operational emissions of criteria pollutants that could contribute to existing or projected air quality standard violations. (Less than Significant)	None required	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Air Quality (cont.)		
Impact AIR-5: The Project would contribute to community health risk impacts. (Potentially Significant)	Mitigation Measure AIR-5: Implement Mitigation Measure AIR-2.	Less than Significant
Impact AIR-6: Sensitive receptors at Marin General Hospital would not be exposed to health risk impacts. (Less than Significant)	None required	
Impact AIR-7: The Project would not generate localized odors. (Less than Significant)	None required	
Impact AIR-8: The Project would contribute to cumulative air quality degradation and to regional air quality cumulative impacts. (Potentially Significant)	Mitigation Measure AIR-8: Implement Mitigation Measures AIR-2 and AIR-3.	Less than Significant
Biological Resources		
Impact BIO-1: Construction of the Project could adversely impact special-status bat species through removal of potential roosting habitat and through increases in noise levels during construction. (Potentially Significant)	Mitigation Measure BIO-1: (Applies to Phases I through IV) The project applicant shall ensure that construction activities are conducted in a manner that avoids disturbance or mortality of bats, through surveys to determine whether bats are present. If bats are present, limit construction activities as specified below. Specifically, the project applicant shall take the following measures to avoid direct mortality of roosting special-status bats and disturbance of maternity roosts or winter hibernacula during Phases I through IV of the project: a) Prior to demolition and/or construction of Phases I through IV, a qualified bat biologist, shall conduct surveys of all potential bat habitat within 250 feet of construction activities prior to initiation of such activities. Potentially suitable habitat shall be identified visually. An acoustic detector shall be used to determine any areas of bat activity. At least four nighttime emergence counts shall be undertaken on nights that are warm enough for bats to be active. The bat biologist shall determine the type of each active roost (i.e., maternity, winter hibernaculum, day or night). b) If based on the pre-construction surveys no evidence of bats (i.e., visual or acoustic detection, guano, staining, strong odors) is present, no further mitigation is required. If pre-construction surveys indicate that roosts are inactive or potential habitat is unoccupied during the construction period, no further mitigation is required. c) Trees or buildings with evidence of bat activity shall be removed during the time that is least likely to affect bats, as determined by a qualified bat biologist. In general, roosts should not be removed if maternity bat roosts are present, typically April 15 – August 15. Roosts should not be removed if present bats are in torpor, typically when temperatures are less than	Less than Significant

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Biological Resources (cont.)		
Impact BIO-1 (cont.)	<p>40 degrees Fahrenheit. Non-maternity bat roosts shall be removed by a qualified bat biologist, by either making the roost unsuitable for bats by opening the roost area to allow airflow through the cavity, or excluding the bats using one-way doors, funnels, or flaps.</p> <p>d) A no-disturbance buffer shall be created around active bat roosts being used for maternity purposes at a distance to be determined by the qualified bat biologist in consultation with CDFW <u>CDFG</u>. Bat roosts initiated within 250 feet of the project area after construction has already begun are presumed to be unaffected, and no buffer is necessary. However, the project shall avoid a "take" of individuals, including harming, harassing, or killing.</p> <p>e) If known bat roosting habitat is to be destroyed during tree removal activities, artificial bat roosts shall be constructed at least two weeks prior to such disturbance, in an undisturbed area of the property, at least 250 feet from any ongoing or future activities. The design and location of the artificial bat roost(s) shall be determined by a qualified bat biologist.</p>	
Impact BIO-2: The Project would not have a substantial adverse effect on migratory and breeding birds through building collisions and increases in night lighting. (Less than Significant)	None required	
Impact BIO-3: The Project could affect breeding raptors and other special-status birds through vegetation removal associated with construction. (Potentially Significant)	<p>Mitigation Measure BIO-3a: (Applies to Phases I-IV) No more than two weeks in advance of any tree or shrub pruning, removal, ground-disturbing activity, or other construction activity that will commence during the breeding season (February 1 through August 31), a qualified wildlife biologist shall conduct pre-construction surveys of all potential nesting habitat in the vicinity of the planned activity.</p> <p><u>If construction activities for the project cease for a period of seven days or longer, or if construction does not begin within the immediate area within seven days of the initial pre-construction surveys, the qualified wildlife biologist shall conduct another pre-construction survey.</u></p> <p>Pre-construction surveys are not required for construction activities scheduled to occur during the non-breeding season (August 31 through January 31). Construction activities commencing during the non-breeding season and continuing into the breeding season do not require surveys (as it is assumed that any breeding birds taking up nests would be acclimated to project-related activities already under way).</p> <p><u>If active nests are found on the site during construction, construction shall be temporarily halted and the consultation with the State Department of Fish and Wildlife will be required before re-commencing construction</u></p>	Less than Significant

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Biological Resources (cont.)		
Impact BIO-3 (cont.)	<p><u>activities.</u> Nests initiated during construction activities would be presumed to be unaffected by the activity, and a buffer zone around such nests would not be necessary. However, a nest initiated during construction cannot be moved or altered and the nests shall be clearly identified and the immediate area fenced to prevent destruction.</p> <p>If pre-construction surveys indicate that no nests are present or that nests are inactive or potential habitat is unoccupied, no further mitigation is required. If active nests are found during pre-construction surveys, Mitigation Measure BIO-3b will be required.</p> <p>Mitigation Measure BIO-3b: If active nests are found during pre-construction surveys, the results of the surveys shall be discussed with the CDFG CDFW and avoidance procedures shall be adopted, if necessary, on a case-by-case basis. In the event that an active nest is found, construction in the vicinity would not be initiated until avoidance measures are adopted. Avoidance measures shall include construction buffer areas (up to several hundred feet in the case of raptors), relocation of birds, or seasonal avoidance, as needed. If buffers are created, a no-disturbance zone shall be created around active nests for the remainder of the breeding season, or until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted shall take into account factors such as the following:</p> <ol style="list-style-type: none"> Noise and human disturbance levels at the project site and the nesting site at the time of the survey and the noise and disturbance expected during the construction activity; Distance and amount of vegetation or other screening between the project site and the nest; and Sensitivity of individual nesting species and behaviors of the nesting birds. 	
Impact BIO-4: The Project could affect migratory and breeding birds indirectly through increases in ambient noise due to construction. (Potentially Significant)	<p>Mitigation Measure BIO-4a: (Applies to major noise generating construction and/or demolition phases occurring within 200 feet of Creekside Marsh, as delineated in the Mitigation Monitoring and Reporting Program Attachment 1) To ensure project construction activities do not that would exceed existing ambient noise levels (as documented by long-term noise measurement LT-3, as shown in Figure 4.J-1R provided in the Final EIR, to be 60-69 dBA Leg, as stated on page 4.J-5 of the Draft EIR) at Creekside Marsh by over 10dBA will avoid and minimize adverse effects on California clapper rail reproductive success through one of the following measures:</p> <ol style="list-style-type: none"> Project construction activities shall take place September-January, outside the clapper rail breeding season of February through August); or 	Less than Significant

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Biological Resources (cont.)		
<p>Impact BIO-4 (cont.)</p>	<p>b) Consistent with Mitigation Measure NOI-32 in Section 4.K, <u>Noise, noise reduction measures, including solid plywood fences, sound blankets, or other barriers with noise-dampening materials shall be constructed along portions of the western edge of the project site prior to initiation of construction to serve as noise attenuation barriers. Noise barriers shall be installed on the project site in all locations within 200 feet of the Corte Madera Creekside Marsh and grassland buffer (as delineated in Attachment 1 to the Mitigation Monitoring and Reporting Program and consistent with Figure 4.C-2R [in the Final EIR] supporting Mitigation Measure BIO-6). The barriers shall shield the marshes from major noise generating phases of demolition and construction and will serve to attenuate noise emanating from the project site so any direct or reflected noise would not create increases greater than 10 dBA above current ambient levels in the marshes, where there may be breeding California clapper rails. The fencing noise attenuation barrier shall be a minimum of 8 feet in height, but sufficient in height to reduce any noise from construction on upper stories or building rooftops.</u></p> <p><u>To ensure these noise attenuation barriers prevent significant impacts to breeding California clapper rails, a qualified biologist and noise technician shall periodically monitor noise levels at the edge of Creekside Marsh at least four times per month during the duration of construction within the breeding season.</u></p> <p><u>As an extra measure, the District shall retain a qualified biologist and noise monitor to monitor noise conditions at least four to five times during the month of January. The noise monitoring shall coincide with construction activities anticipated to produce the loudest noise. If sound levels are measured that exceed 10 dBA above ambient noise conditions, construction shall be temporarily halted and the contractor shall assess whether other work that would not exceed this threshold can be conducted during the phase of work. If no other construction can occur, work shall not re-commence until consultation with USFWS and CDFW¹ occurs.</u></p> <p>¹ <u>Previously "California Department of Fish and Game" or "CDFG" at the time the Draft EIR was published. This revision is made throughout only where it affects mitigation measures and current discussion in this Final EIR.</u></p> <p>Mitigation Measure BIO-4b: Implement Mitigation Measure NOI-32.</p>	
<p>Impact BIO-5: The Project would not have a substantial adverse effect on Waters of the United States, Waters of the State, or critical habitat for endangered steelhead and coho salmon. (Less than Significant)</p>	<p>None required</p>	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Biological Resources (cont.)		
<p>Impact BIO-6: The Project would involve the removal of native trees protected under the Marin County Native Tree Protection and Preservation Ordinance. Tree work on the project site has the potential to spread sudden oak death syndrome. (Potentially Significant)</p>	<p>Mitigation Measure BIO-6a: (Applies to Phases I-IV) Prior to construction initiation for each project phase, the project applicant shall prepare a map indicating the size and species of trees to be removed and retained. In addition, the project applicant shall do all of the following:</p> <ul style="list-style-type: none"> a) Prior to the start of any clearing, stockpiling, excavation, grading, compaction, paving, change in ground elevation, or construction, preserved trees that occur adjacent to, or within, project construction shall be identified as preserved and clearly delineated by constructing short post and plank walls, or other protective fencing material, at the dripline of each tree. b) The delineation markers shall remain in place for the duration of the work. c) Where proposed development or other site work must encroach upon the dripline of a preserved tree, special construction techniques shall be required to allow the roots of remaining trees within the project site to breathe and obtain water (examples include, but are not limited to, use of hand equipment for tunnels and trenching, and/or allowance of only one pass through a tree's dripline). Tree wells or other techniques may be used. d) Excavation adjacent to any trees, when permitted, shall be in such a manner that shall cause only minimal root damage. e) The following shall not occur within the dripline of any retained tree: parking; storage of vehicles, equipment, machinery, stockpiles of excavated soils, or construction materials; or dumping of oils or chemicals. <p>Mitigation Measure BIO-6b: (Applies to Phases I-IV): All pruning activities of preserved trees shall be performed by a certified arborist.</p> <ul style="list-style-type: none"> a) No more than 25 percent of a tree's canopy shall be removed during pruning activities of retained trees. b) If any protected preserved tree is damaged, then the project applicant shall replace the tree as required by the County. c) All removed trees that meet the criteria of a protected tree shall be replaced with the same species removed as required by the County. <p>Mitigation Measure BIO-6c: (Applies to Phases I-IV): The project applicant shall develop and implement a five-year monitoring program for any required replacement plantings. Applicable performance standards may include, but are not limited to: 75 percent survival rate of replacement plantings; absence of invasive plant species; and self-sustaining trees at the end of five years.</p>	<p align="center">Less than Significant</p>

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Biological Resources (cont.)		
<p>Impact BIO-6 (cont.)</p>	<p>Mitigation Measure BIO-6d: (Applies to Phases I-IV): All tree removal and pruning activities shall include measures to avoid the spread of SOD. Such measures may include, but are not limited to the following:</p> <p><i>Before working:</i></p> <ul style="list-style-type: none"> a) As a precaution against spreading the pathogen, clean and disinfect pruning tools after use on confirmed or suspected infested trees or in known infested areas. Sanitize tools before pruning healthy trees or working in pathogen-free areas. Clean chippers and other vehicles of mud, dirt, leaves, organic material, and woody debris before leaving a site known to have SOD and before entering a site with susceptible hosts. b) Inform crews about the arboricultural implications of SOD and sanitation practices when they are working in infested areas. c) Provide crews with sanitation kits. (Sanitation kits should contain the following: Chlorine bleach (10/90 mixture bleach to water) or Clorox Clean-up® or Lysol®, scrub brush, metal scraper, boot brush, and plastic gloves). d) Sanitize shoes, pruning gear, and other equipment before working in an area with susceptible species. <p><i>While working:</i></p> <ul style="list-style-type: none"> a) When possible, work on SOD-infected and susceptible species during the dry season (June-October). When working in wet conditions, keep equipment on paved, graveled, or dry surfaces and avoid mud. b) Work in disease-free areas before proceeding to infested areas. c) If possible, do not collect soil or plant material (wood, brush, leaves, and litter) from host trees in the quarantine area. Within the quarantine area, host material (e.g., wood, bark, brush, chips, leaves, or firewood) from tree removals or pruning of symptomatic or non-symptomatic host plants should remain onsite to minimize pathogen spread. <p><i>After working:</i></p> <ul style="list-style-type: none"> a) Use all reasonable methods to sanitize personal gear and crew equipment before leaving a SOD infested site. Scrape, brush, and/or hose off accumulated soil and mud from clothing, gloves, boots, and shoes. Remove mud and plant debris by blowing out or power washing chipper trucks, chippers, bucket trucks, fertilization and soil aeration equipment, cranes, and other vehicles. b) Restrict the movement of soil and leaf litter under and around infested trees as spores may be found there. 	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Biological Resources (cont.)		
Impact BIO-6 (cont.)	c) Tools used in tree removal/pruning may become contaminated and should be disinfected with Lysol® spray, a 70 percent or greater solution of alcohol, or a Clorox® bleach solution (1 part Clorox® bleach to 9 parts water or Clorox Cleanup ®). Implementation of Mitigation Measures BIO-6a through BIO-6d would reduce impacts to trees protected under the Marin County Tree Preservation Ordinance.	
Impact BIO-7: The Project, combined with other past, present, and reasonably foreseeable development in the vicinity of the Project site would not result in cumulative impacts on special-status species, wetlands and other waters of the U.S. and State, and protected trees. (Less than Significant)	None required	
Cultural and Paleontological Resources		
Impact CUL-1: The Project will have an impact on a historical resource as defined by PRC Section 5024.1. (Significant)	Mitigation Measure CUL-1: The project applicant shall conduct the following: <ul style="list-style-type: none"> • Pre-demolition photo-documentation, a report, and as-built drawings of the gardens in accordance with the Historic American Landscape Survey (HALS) standards. This documentation would include a HALS report in either the short form format or a longer outline format and a measured drawing of the existing conditions. A copy of all of the HALS documentation shall be provided to the Lawrence Halprin archives at the University of Pennsylvania and the Anne T. Kent California Room in the Marin County Free Library. No additional historic registries local to Marin County could be identified. • Installation of a public plaque or element that commemorates the work of Lawrence Halprin on this site. • Design of a new garden that commemorates Lawrence Halprin's design contributions: <ul style="list-style-type: none"> - Within a new garden, recognize Halprin's use of hardscape materials, landscape grading and planting to evoke local, natural elements and delineate space. The garden would not relocate or mimic Halprin's gardens, but could possibly reuse some materials and/or incorporate similar materials in its construction, particularly plant materials. - Locate the new garden in view of the Corte Madera Marsh to maintain the connection of the hospital landscape to the broader natural setting. 	Significant and Unavoidable

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Cultural and Paleontological Resources (cont.)		
<p>Impact CUL-1 (cont.)</p>	<ul style="list-style-type: none"> • Incorporate a more private garden within the hospital landscape for the purpose of respite or reflection within a natural setting. The intent would be to recall and respect rather than mimic Halprin's work. The garden could also incorporate elements that reference Halprin and his influence. • Marin General Hospital will seek donations to commemorate Lawrence Halprin's influence on the design of the Marin General Hospital Landscape; donations could fund an intern to work with the Halprin archivist at the University of Pennsylvania or similar relevant efforts for a one-year time duration. • Document other Bay Area designs of Halprin's from this early period in his career. This documentation would include a list of his projects, plans when available, project locations, a written description identifying the project types and whether they were public or private commissions and photos, when possible, showing the overall character of the designs. The research could serve as an important resource for the local community and could be combined with HALS documentation, with copies sent to the University of Pennsylvania, the Marin County Free Library, or other institutions. <p>Demolition or destruction of a historical resource, cannot be mitigated below a level of significance, however this mitigation would add to the body of knowledge about Lawrence Halprin's work and would provide further documentation of this particular design.</p>	
<p>Impact CUL-2: The Project would have an impact on archaeological resources as defined by PRC Section 21083.2(g). (Potentially Significant)</p>	<p>Mitigation Measure CUL-2: A Secretary of the Interior-qualified archaeologist and a Native American monitor shall be present during ground-disturbing activities in the vicinity of Buildings 1, 2, and 3, and the Halprin Gardens. During the course of the monitoring, the archaeologist may adjust the frequency of the monitoring—from continuous to intermittent— based on observed conditions (i.e. artificial fill) and professional judgment regarding the potential to impact resources. Prior to ground disturbing activities, an archaeological monitoring plan shall be developed that includes:</p> <ul style="list-style-type: none"> • Training program for all construction personnel involved in site disturbance activities; • Qualifications of person responsible for conducting monitoring activities, including Native American monitors; • The required format and content of monitoring reports, assessment, designation and mapping of sensitive cultural resource areas on final project maps; 	<p align="center">Less than Significant</p>

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Cultural and Paleontological Resources (cont.)		
<p>Impact CUL-2 (cont.)</p>	<ul style="list-style-type: none"> • Person(s) responsible for overseeing and directing the monitors; • Schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports; • Physical monitoring boundaries; • Protocol for notifications in case of encountering of cultural resources, as well as methods of dealing with the encountered resources (e.g., collection, identification, curation); • Methods to ensure security of cultural resources sites; • Protocol for notifying local authorities (i.e., Sheriff, Police) should site looting and other illegal activities occur during construction. <p>If cultural resources are encountered during construction, all activity in the vicinity of the find shall cease until it can be evaluated by a qualified archaeologist and a Native American representative. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the archaeologist and Native American representative determine that the resources may be significant, they will notify the County. An appropriate treatment plan for the resources shall be developed and shall be submitted to the County for review and approval. The archaeologist shall consult with Native American representatives in determining appropriate treatment for prehistoric or Native American cultural resources.</p> <p>In considering any suggested mitigation proposed by the archaeologist and Native American representative, the County will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed in other parts of the site while mitigation for cultural resources is being carried out.</p>	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Cultural and Paleontological Resources (cont.)		
Impact CUL-3: The Project could have an impact on a paleontological resource. (Potentially Significant)	Mitigation Measure CUL-3: If fossil or fossil bearing deposits are discovered during construction, excavations within 50 feet of the find shall be temporarily halted or diverted until the discovery is examined by a qualified paleontologist (in accordance with Society of Vertebrate Paleontology standards). The paleontologist shall document the discovery as needed, evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA <i>Guidelines</i> Section 15064.5. The paleontologist shall notify Marin County to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the County determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project, based on the qualities that make the resource important. The excavation plan will include identification of an institution willing and able to accept fossil specimens; and emergency discovery procedures, including survey and record keeping of fossil-finds, bulk sediment sample collection and processing, specimen identification, disposition, and museum curation of any specimens and data recovered. The excavation plan shall be submitted to the County for review and approval prior to implementation.	Less than Significant
Impact CUL-4: The Project could have an impact on human remains. (Potentially Significant)	Mitigation Measure CUL-4: If potential human remains are encountered, the contractor will halt work in the vicinity of the find and contact the Marin County coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the coroner determines the remains are Native American, the coroner will contact the Native American Heritage Commission. As provided in PRC §5097.98, the Native American Heritage Commission will identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent will make recommendations for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.	Less than Significant
Impact CUL-5: The Project, combined with other past, present and reasonably foreseeable development would not have a cumulative impact on cultural resources. (Less than Significant)	None required	
Geology, Soils, and Seismicity		
Impact GEO-1: The Project would not expose people or structures to potential substantial adverse effects involving strong seismic ground-shaking and associated secondary effects due to landslides and/or weak or liquefiable soils. (Less than Significant)	None required	

TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Geology, Soils, and Seismicity (cont.)		
Impact GEO-2: The Project would not expose people or structures to potential substantial adverse effects involving soils that have shrink-swell characteristics or other properties (e.g., corrosivity, settlement, or collapse) that could damage foundations, underground utilities, and other sub-grade structures. (Less than Significant)	None required	
Impact GEO-3: The Project would not have a substantial adverse effect due to it being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, resulting in a landslide, earthflow or other earth movement, or be subject to soil erosion or loss of topsoil. (Less than Significant)	None required	
Impact GEO-4: The Project, combined with other existing, planned, proposed, or reasonably foreseeable development in the region, would not result in cumulative geologic and soil hazards. (Less than Significant)	None required	
Greenhouse Gases and Climate Change		
Impact GHG-1: Construction of the Project would result in increased GHG emissions, but would incorporate best management practices. (Less than Significant)	None required	
Impact GHG-2: Operations of the Project would result in increased GHG emissions. (Potentially Significant)	<p>Mitigation Measure GHG-2: The Project shall include the following features to reduce energy consumption that could reduce the GHG emissions associated with the proposed project.</p> <ul style="list-style-type: none"> • <i>Additional Transportation Demand Management Strategies.</i> The project applicant shall implement the following Transportation Demand Management (TDM) program strategies, in addition to maintaining the existing Marin General Hospital valet parking and shuttle transit service, <u>onsite carpool parking spaces, and pre-tax transit expense reimbursements for employees.</u> TDM strategies <ol style="list-style-type: none"> a) <u>Employee Commute Program.</u> Develop and implement a Marin General Hospital employee commute program with specific actions and goals to provide on-site information to employees about commute alternatives to and from Marin General Hospital. <u>Specific actions shall include the administration of an annual commute behavior survey, implementation of a mandated expanded commuter benefit programs, and periodic incentives to promote and encourage commute alternatives to driving alone.</u> • Designate an employee transportation coordinator (ETC) to facilitate the program; 	Less than Significant

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Greenhouse Gases and Climate Change (cont.)		
<p>Impact GHG-2 (cont.)</p>	<p>b) <u>Carpool and Vanpool Matching</u>. Provide easy access to carpool and vanpool matching for Marin General Hospital employees, working together with the <u>Metropolitan Transportation Commission (MTC), 511 Rideshare</u>, Transportation Authority of Marin (<u>TAM</u>), or other agency or organization with this objective. <u>Provide a rideshare matching information bulletin board, website or other effective means of facilitating coordination among potential employees interested in ridesharing;</u></p> <p>c) <u>Bicycle Facilities</u>. Provide incorporate employee <u>access to</u> showers and <u>changing facilities and provide</u> additional secured bicycle parking facilities to encourage bicycle use by Marin General Hospital employees;</p> <p>d) <u>Emergency Ride Home</u>. Participate in the <u>countywide</u> Emergency Ride Home (ERH) program <u>administered by TAM for employees who use commute alternatives to driving alone for Marin County employees when it is made available by the County;</u></p> <p>e) <u>Expanded Preferential Parking Program</u>. <u>Designate an increased ratio of on-site parking for carpool vehicles (exclusive of elderly and handicapped parking). (The current ratio is approximately one per 120 total on-site spaces – five of 605 spaces.) Clearly indicate the location of the preferential parking spaces using appropriate signage;</u></p> <p>f) <u>Vanpool Program Support</u>. <u>Support and promote the development of employee vanpools countywide, in cooperation with MTC, 511 Rideshare, TAM, and other agencies offering incentive programs, as appropriate.</u></p> <p><u>Implementation Timeframes</u>. <u>Within one calendar year after patient occupancy of the Hospital Replacement Building,</u> The project applicant shall initially submit to the County Department of Public Works (or other department or agency <u>as designated by the County</u>) documentation sufficient to demonstrate implementation and effectiveness of each of the aforementioned strategies <u>within the timeframes below</u>. Also, each of the strategies, except as specified below, shall also be extended to include employees of the Ambulatory Services Building when that building is operational.</p> <p>- <u>At completion of the Hillside Parking Structure (End of Phase I), and annually thereafter:</u> TDM strategies “a” (<u>Employee Commute Program</u>), <u>except the administration of an annual commute behavior survey;</u> “b” (<u>Carpool and Vanpool Matching</u>); “d” (<u>Emergency Ride Home</u>); and “f” (<u>Vanpool Program Support</u>). <u>Except for the administration of an annual commute behavior survey with TDM strategy “a”, each of these strategies are administrative and viable for implementation during construction.</u></p>	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Greenhouse Gases and Climate Change (cont.)		
Impact GHG-2 (cont.)	<ul style="list-style-type: none"> - <u>One calendar year after completion of the Hillside Parking Structure (Phase I + 1 Year): Part of TDM strategy "a" (<i>Employee Commute Program</i>) to administer an annual commute behavior survey. This duration allows time for the Employee Commute Program to be established and used before surveying.</u> - <u>Upon completion of the Ambulatory Services Building (End of Phase III): Part of TDM strategy "c" (<i>Bicycle Facilities</i>) to provide additional secured bicycle parking facilities; and TDM strategy "e" (<i>Expanded Preferential Parking Program</i>).</u> - <u>Upon patient occupancy of the Hospital Replacement Building (End of Phase IV): Part of TDM strategy "c" (<i>Bicycle Facilities</i>) to provide employee access to showers and changing facilities for expanded bicycle facilities. This TDM strategy involves establishing facilities in the hospital and therefore would not be available until after the Hospital Replacement Building is operational.</u> • <i>Reduce Waste Generation.</i> MGH shall include waste management and recycling programs to minimize solid waste generation. Such programs are assumed to minimize waste production. The applicant shall implement waste management and recycling programs to minimize solid waste generation. At a minimum, the applicant shall provide employee information, instructional signage at waste areas; and designated recycling bins to promote avoiding products with excessive packaging, recycling, buying refills instead of new items, separating food and landscaping waste (if composting such waste is elected for the program), and using rechargeable batteries, wherever feasible and consistent with hospital operations and regulations. For modeling purposes, GHG emissions associated with energy associated with landfilling of waste were assumed to be reduced by 10 percent, consistent with and expected reduction in waste generation. 	
Impact GHG-3: The Project would not conflict with an applicable plan, policy, or regulation adopted to reduce GHGs. (Less than Significant).	None required	
Impact GHG-4: The incremental GHG impact of the Project would be cumulatively considerable (Potentially Significant)	Mitigation Measure GHG-4: Implement Mitigation Measure GHG-2.	Less than Significant
Hazards and Hazardous Materials		
Impact HAZ-1: The Project would not cause a significant hazard due to the transport, use and storage of hazardous chemicals, radioactive materials, and biohazardous materials. (Less than Significant)	None required	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Hazards and Hazardous Materials (cont.)		
Impact HAZ-2: The Project's demolition or renovation of existing structures that contain hazardous building materials would not cause a significant hazard by exposing workers, the public, or the environment to them or by generating hazardous waste. (Less than Significant)	None required	
Impact HAZ-3: The Project would not cause a significant hazard by emitting hazardous materials or handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. (Less than Significant)	None required	
Impact HAZ-4: The Project would occur on a site listed in Government Code Section 65962.5 and could disturb soil and groundwater impacted by historic hazardous material use, but would not cause a significant hazard by exposing construction workers, the public, or the environment to adverse conditions related to hazardous materials handling. (Less than Significant)	None required	
Impact HAZ-5: The Project would not cause a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)	None required	
Impact HAZ-6: The Project, combined with past, present and other reasonably foreseeable development in the area, would not cause cumulative impacts with respect to hazardous materials. (Less than Significant)	None required	
Hydrology and Water Quality		
Impact HYD-1: The project would not involve activities that would violate water quality standards or waste discharge requirements; result in substantial erosion or siltation; create or constitute substantial polluted runoff; or otherwise substantially degrade water quality. (Less than Significant)	None required	
Impact HYD-2: The Project would not result in impacts due to the depletion of groundwater supplies or substantially interference with groundwater recharge. (Less than Significant)	None required	
Impact HYD-3: The Project would not alter existing drainage patterns, which could result in increased pollutant loading in stormwater runoff, leading to violation of water quality standards of receiving waters or increase the volume of stormwater runoff, leading to flooding in downstream areas. (Less than Significant)	None required	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Hydrology and Water Quality (cont.)		
Impact HYD-4: The Project would not result in significant impacts by placing structures within a 100-year flood hazard zone. (Less than Significant)	None required	
Impact HYD-5: The Project would not expose people or structures to a significant risk of loss, injury or death resulting from flooding caused by failure of a levee or dam. (Less than Significant)	None required	
Impact HYD-6: The Project site would not expose people or structures to a significant risk of loss, injury or death resulting from flooding caused by seiche, tsunami or mudflow. (Less than Significant)	None required	
Impact HYD-7: The project, in conjunction with past, present and other reasonably foreseeable development in the area, would not cause cumulative impacts with respect to hydrology and water quality. (Less than Significant)	None required	
Land Use, Plans, and Policies		
Impact LU-1: The Project would not conflict with uses at the periphery of the project area, divide an existing community, convert open space, or result in incompatible land uses. (Less than Significant)	None required	
Impact LU-2: The Project would not conflict with any applicable land use plan, goal, policy, or regulation, including zoning, adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)	None required	
Impact LU-3: The Project, combined with past, present, and reasonably foreseeable projects in the area, would not result in a cumulative land use impact regarding land use, plans and policies. (Less than Significant)	None required	
Noise and Vibration		
Impact NOI-1: The Project would not develop land uses that would be incompatible with the noise environment at and nearby the project site. (Less than Significant)	None required	
Impact NOI-2: Construction of the Project would substantially and temporarily increase noise levels in areas of sensitive receptors and exceed the ambient noise environment. (Significant)	Mitigation Measure NOI-2: a) Pursuant to Sections 6.70.030(5) and 6.70.040 of the Marin County Municipal Code, restrict noise-generating activities at the construction site or in areas adjacent to the construction site to the hours of 7:00 a.m. to 6:00 p.m., Monday through Friday and 9:00 a.m. to	Significant and Unavoidable

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Noise and Vibration (cont.)		
Impact NOI-2 (cont.)	<p>5:00 p.m. on Saturday. Construction will be prohibited on Sundays and holidays. Loud noise-generating construction-related equipment (e.g., backhoes, generators, jackhammers) can be maintained, operated, or serviced at a construction site for permits administered by the community development agency from 8:00 a.m. to 5:00 p.m. Monday through Friday only.</p> <p>b) If during construction it is determined that construction noise disrupts on-going hospital operations for workers of patients within patient rooms or existing medical offices, the project shall erect temporary noise control blanket barriers along existing hospital building facades facing the construction area. <u>This mitigation shall be coordinated with Mitigation Measure BIO-4a.</u> The specific location and height of barriers would depend on the extent of the problem indoors. Noise control blanket barriers can be rented and quickly erected to reduce the intrusiveness of construction noise indoors. If construction noise is not problematic and does not disrupt hospital or medical office operations, the temporary noise barriers would not be necessary.</p> <p>c) Where it is feasible to block the line-of-sight to construction activities, construct solid plywood fences (minimum eight feet in height either around the construction zone or at the common property line) to shield adjacent residences or other noise-sensitive land uses prior to major noise generating phases of demolition and construction;</p> <p>d) Shield adjacent sensitive uses from stationary equipment with individual noise barriers or partial acoustical enclosures;</p> <p>e) Develop a plan to Relocate patient rooms and sensitive medical offices away from areas undergoing construction, <u>as feasible and practical</u>;</p> <p>f) Use manually adjustable or self-adjusting back-up alarms to increase or decrease the volume of the alarm based on background noise levels. Installation and use of the back-up alarms will be consistent with OSHA (Occupational Safety and Health Administration) regulations;</p> <p>g) Utilize 'quiet' models of air compressors and other stationary noise sources where technology exists;</p> <p>h) Equip all internal combustion engine-driven equipment with intake and exhaust mufflers, which are in good condition and appropriate for the equipment;</p> <p>j) Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from residences or noise-sensitive land uses;</p> <p>k) Locate staging areas and construction material areas as far away as possible from residences or noise-sensitive land uses;</p>	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Noise and Vibration (cont.)		
Impact NOI-2 (cont.)	<ul style="list-style-type: none"> l) Route all construction traffic to and from the project site via designated truck routes where possible. Prohibit construction related heavy truck traffic in residential areas where feasible; m) Control noise from construction workers' radios to a point that they are not audible at existing residences bordering the project site; n) Conduct sensitivity training to inform construction personnel about the requirements of the construction noise control plan and about methods to reduce noise; o) Prohibit all unnecessary idling of internal combustion engines; p) Notify all adjacent business, residences, and noise-sensitive land uses of the construction schedule in writing; q) Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would require that reasonable measures warranted to correct the problem be implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule. 	
Impact NOI-3: Construction of the Project could expose persons to groundborne vibration. (Potentially Significant)	Mitigation Measure NOI-3: Implement Mitigation Measure NOI-2.	Less than Significant
Impact NOI-4: The Project could generate operational noise levels that exceed standards established in the Marin Countywide Plan. (Potentially Significant)	Mitigation Measure NOI-4a: During final design of the project, conduct an acoustical analysis to ensure that noise resulting from the rooftop mechanical equipment on the Hospital Replacement Building complies with applicable General Plan policies. The acoustical analysis would calculate noise levels resulting from the selected equipment at the nearest sensitive receiving land uses, assess noise levels relative to applicable standards, and provide feasible and reasonable recommendations to control noise levels in accordance with the applicable limits. Particular attention will be given to the chiller room enclosure and cooling towers. Additional noise control measures might include, but are not limited to, selection of quieter equipment, baffles, packaged sound attenuators, and noise barriers. The report will be completed and submitted to the building department prior to the issuance of building permits, and will be used to determine the added noise measures required.	Less than Significant

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Noise and Vibration (cont.)		
Impact NOI-4 (cont.)	Mitigation Measure NOI-4b: During final design of the project, conduct an acoustical analysis to ensure that noise resulting from the operation of the emergency generators is reduced to 85 dBA or less (or a lower limit if necessary to minimize interference with hospital operations) in the ambulance bay. The report will be completed and submitted to the building department prior to the issuance of building permits related to installation of the generators in the West Wing, and will provide feasible and reasonable recommendations as needed to control noise levels in accordance with the applicable limits. Additional noise control measures might include, but are not limited to, high-performance (hospital or critical grade) mufflers, additional banks of silencers, or acoustical louvers. The additional noise control would also reduce noise levels in the surrounding community during testing or emergency operations.	
Impact NOI-5: The Project would not result in increased traffic volumes that would substantially increase noise levels at sensitive receivers in the project vicinity. (Less than Significant)	None required	
Impact NOI-6: The Project, combined with past, present, and reasonably foreseeable projects, would not substantially increase traffic noise levels along area roadways or result in cumulatively significant temporary or operational noise or vibration effects. (Less than Significant)	None required	
Population, Housing, and Employment		
Impact POP-1: The Project would not induce substantial population growth or concentration of population in the area, either directly or indirectly. (Less than Significant)	None required	
Impact POP-2: The Project could conflict with housing and population projections and policies as set forth in the Countywide Plan. (Less than Significant)	None required	
Impact POP-3: The Project, in conjunction with past, present and reasonably foreseeable projects, would not contribute to a cumulatively considerable effect related to population, housing and/or employment. (Less than Significant)	None required	
Public Services and Recreation		
Impact PSR-1: The Project would not cause a substantial adverse physical impact due to increased demand for fire protection services and emergency medical assistance. (Less than Significant)	None required	

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Public Services and Recreation (cont.)		
Impact PSR-2: The Project would not cause a substantial adverse physical impact due to increased demand for police protection services. (Less than Significant)	None required	
Impact PSR-3: The Project would not cause a substantial adverse physical impact due to the need for additional school capacity or facilities. (Less than Significant)	None required	
Impact PSR-4: The Project would not result in increased use of parks at levels that would require the designation of additional parkland to remain in conformance with locally adopted park standards. (Less than Significant)	None required	
Impact PSR-5: The Project would not result in increased use of recreational facilities that would result in substantial and/or accelerated physical deterioration of facilities. (Less than Significant)	None required	
Impact PSR-6: The Project, combined with past, present, and other reasonably foreseeable development in the area, would not contribute to cumulative impacts with respect to public services and recreation. (Less than Significant)	None required	
Transportation and Circulation		
Impact TRA-1: The Project would increase traffic volumes on area roadways and affect levels of service at the local and CMP study intersections and freeways under Existing plus Project Conditions. (Significant for intersection LOS and queuing on Bon Air Road/Sir Francis Drake Blvd. Less than Significant for freeway segment LOS)	None feasible for intersection LOS and queuing on Bon Air Road/Sir Francis Drake Blvd. None required for freeway segment LOS	Significant and Unavoidable for intersection LOS and queuing on Bon Air Road/Sir Francis Drake Blvd
Impact TRA-2: The Project would substantially increase traffic safety hazards for vehicles, bicyclists, and pedestrians on public roadways due to roadway design features, incompatible uses, or Project-related vehicles trips. (Potentially Significant regarding hazards for vehicles. Less than Significant for bicyclists, pedestrians, and transit service.)	Mitigation Measure TRA-2a: To improve vehicle sight distance from the planned parking garage right-turn only westbound driveway onto Bon Air Road, no vehicle parking shall be allowed on the east side of Bon Air Road between the garage's outbound only driveway and the planned inbound only ambulance driveway located to the south (which would entail removal of two parking spaces, in addition to the two or three parking spaces removed to accommodate the new driveways). In addition, planned trees and shrubbery shall be removed in the landscaped areas both south and between the two driveways to allow for improved vehicle sight distance. These measures will result in reducing potential vehicle sight distance problems to a less-than-significant level.	Less than Significant

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Transportation and Circulation (cont.)		
Impact TRA-2 (cont.)	<p>Mitigation Measure TRA-2b: To improve traffic flow and reduce potential queuing impacts at the main full-access southern driveway, it is recommended that a double yellow lane striping shall be installed from the driveway's raised median around the internal curb northbound into the drive aisle to prevent queued vehicles from potentially blocking inbound traffic to the site.</p> <p>None required for bicyclists, pedestrians, and transit service</p>	Less than Significant
Impact TRA-3: The Project could result in inadequate emergency access. (Potentially Significant)	Mitigation Measure TRA-3: Implement Mitigation Measure TRA-2a (improve vehicle sight distance from the planned parking garage right-turn only westbound driveway onto Bon Air Road).	Less than Significant
Impact TRA-4: The Project would not be inconsistent with adopted polices, plans, and programs supporting alternative transportation. (Less than Significant)	None required	
Impact TRA-5: The Near-Term Project would increase traffic volumes on area roadways and affect levels of service at the local and CMP study intersections and freeways under Near-Term (Year 2018) plus Near-Term Project Conditions. (Significant for intersection LOS and queuing on Bon Air Road/Sir Francis Drake Blvd. Less than Significant for freeway segment LOS)	None feasible for intersection LOS and queuing on Bon Air Road/Sir Francis Drake Blvd None required for freeway segment LOS	Significant and Unavoidable for intersection LOS and queuing on Bon Air Road/Sir Francis Drake Blvd
Impact TRA-6: The Project would generate temporary increases in traffic volume and temporary effects on transportation conditions during construction activities. (Less than Significant)	None required	
Impact TRA-7: The Project, in conjunction with past, present and other reasonably foreseeable future development in the area, would increase traffic volumes on area roadways and affect levels of service at the local and CMP study intersections and freeways under Cumulative plus Project conditions. (Significant for intersection LOS and queuing on Bon Air Road/Sir Francis Drake Blvd, and freeway segment LOS)	<p>Mitigation Measure TRA-7: If the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement project circulation improvement for Sir Francis Drake Boulevard (eastbound through lane at Eliseo Drive) is deemed feasible, <u>the project applicant shall contribute proportional a "fair share" contribution towards that improvement, based on the project's percent contribution to the total cumulative year 2035 plus project volume at the intersection.</u></p> <p><u>The project applicant shall contribute a proportional "fair share" towards the upgrade of A70 traffic signal controllers along Sir Francis Drake Boulevard at the affected intersections at the Wolfe Grade, La Cuesta, and Eliseo Drive intersections based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections.</u></p> <p><u>The project applicant shall contribute a proportional "fair share" towards an engineering study to evaluate the potential for increasing the westbound</u></p>	Significant and Unavoidable for intersection LOS and queuing on Bon Air Road/Sir Francis Drake Blvd Significant and Unavoidable freeway segment LOS

**TABLE 2-1R (Continued)
SUMMARY OF IMPACTS, MITIGATION MEASURES, AND RESIDUAL EFFECTS**

Environmental Impact	Mitigation Measures	Level of Significance after application of Mitigation
Transportation and Circulation (cont.)		
Impact TRA-7 (cont.)	<u>left-turn lane storage based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections the Bon Air Road/Sir Francis Drake Boulevard intersection.</u> None feasible for intersection LOS at Sir Francis Drake Boulevard intersections at Wolfe Grade and La Cuesta Drive, and for queuing on Bon Air Road/Sir Francis Drake Blvd None feasible for freeway segment LOS	
Utilities and Service Systems		
Impact UTIL-1: The Project would not require new or substantially expanded water facilities or new entitlements. (Less than Significant)	None required	
Impact UTIL-2: The Project would not require expanded wastewater treatment services. (Less than Significant)	None required	
Impact UTIL-3: The Project would not be served by a landfill with insufficient permitted capacity or conflict with solid waste regulations. (Less than Significant)	None required	
Impact UTIL-4: The Project would not be served by energy suppliers with inadequate capacity and would not conflict with energy conservation standards. (Less than Significant)	None required	
Impact UTIL-5: Construction of the Project would not use or encourage large or inefficient use of energy, exceed the energy supplier's existing capacity, or conflict with energy conservation standards. (Less than Significant)	None required	
Impact UTIL-6: The Project, in combination with other past, present, and reasonably foreseeable development, would not result in cumulative impacts on utilities and service systems. (Less than Significant)	None required	

CHAPTER 4

Commenters on the Draft EIR

4.1 Agencies, Organizations and Individuals Commenting in Writing

The following lists correspondence received from public agencies, organizations, and individuals, generally in the order it was received by the Marin Healthcare District. Public agencies are generally listed by level of jurisdiction (e.g., state, regional, county), then date.

Designator	Agency / Signatory Name(s)	Correspondence Received	Correspondence Dated
PUBLIC AGENCIES			
A	California Department of Transportation, Local Development – Intergovernmental Review Eric Alm, District Branch Chief	10/11/12	10/11/12
B	California Department of Fish and Game, Reanna Patin for Scott Wilson, Acting Regional Manager, Bay Delta Region	10/12/12	10/12/12
C	Ross Valley Sanitary District, Randell Y. Ishii, District Engineer	10/9/12	10/3/12
D	County of Marin, Department of Public Works, Berenice Davidson, Senior Civil Engineer	10/22/12	10/22/12
E	Transportation Authority of Marin, Suzanne Loosen, Transportation Planner	10/22/12	10/22/12
F	Marin County Health, Donna Mills	9/6/12	9/6/12
G	Marin County Health, Donna Mills	9/17/12	9/17/12
ORGANIZATIONS			
H	Kentfield Planning Advisory Board, Anne Peterson, KPAB Chair	10/19/12	10/19/12
I	Marin Audubon Society, Barbara Salzman and Phil Peterson, Co-chairs, Conservation Committee	10/19/12	10/17/12
J	Marin Conservation League, Susan Stompe, President	10/19/12	10/19/12

Designator	Agency / Signatory Name(s)	Correspondence Received	Correspondence Dated
INDIVIDUALS			
K	James Gunther	9/20/12	9/20/12
L	Noreen Kennedy	10/4/12	10/4/12
M	Theresa Ward, Spyglass Hill Property Owner's Association	10/11/12	10/11/12
N	Carol Nelson	10/17/12	10/17/12
O	Alex Stadtner, Healthy Building Science	10/18/12	10/18/12
P	Gail Napell	10/22/12	10/22/12

4.2 Commenters at the Public Hearing

The following lists persons who provided comments at the Public Meeting on the Draft EIR, held on October 11, 2012. Speakers are listed generally in order of presentation.

District and Consultant Speakers

Ron Peluso, Vertran Associates (Consultant)
 Crescentia Brown, ESA (CEQA Consultant)
 Jon Friedenber, Marin Healthcare District (District)
 Ed Shaffer, Archer Norris (Consultant/Counsel)

Public Speakers (Listed in the Order of Speaking)

Paul and Margie Taylor, Neighbors
 Theresa Ward, Spyglass Hill Property Owner's Association
 Darin Huard, REACH Air Ambulance
 Anne Petersen, Kentfield Planning Advisory Board
 Melissa Panages, Neighbor
 Jean Severinghaus, Marin Resident in Greenbrae
 Leland S. Johnson, Bayview Homeowner's Association
 Xantha Bruso
 Len Rifkind, Larkspur City Council
 Deana Kardel, Neighbor
 Margaret Jones, League of Women Voters
 Ann Thomas
 Alan Derwin, Kentfield Planning Advisory Board

Written Comments Submitted by Speakers at the Public Hearing

<u>Designator</u>	<u>Commenter</u>
PM-A	Theresa Ward, Spyglass Hill Property Owner's Association
PM-B	Melissa Panages, Neighbor
PM-C	Jean Severinghaus, Marin Resident
PM-D	Margaret Jones, League of Women Voters

CHAPTER 5

Responses to Written Comments Received on the Draft EIR

This chapter includes copies of the written comments received by hand-delivered mail or electronic mail during the public review period on the Draft EIR. Consistent with the list of commenters presented in Chapter 4, correspondence received from public agencies is presented first, followed by those received from organizations and individuals.

Each correspondence is identified by a letter designator (e.g., “Letter A”). Discrete comments within each correspondence are identified by an alphanumeric designator that is the letter designator and the numeric sequence of the specific comment (e.g. “A-1” for the first comment in Letter A). The set of responses to a letter is presented immediately following the full letter or email.

Nearly all responses to written comments are presented in this chapter. Comments pertaining to the certain physical characteristics of proposed project buildings and to potential aesthetics effects to hillside residential complexes uphill to the east and northeast of the project site are responded to briefly in this chapter and then referred to in Chapter 2 (Project Clarifications and Additional Information) of this document, where this information is addressed in a cohesive presentation with supporting exhibits.

Responses focus on comments that pertain to the adequacy of the analysis in the Draft EIR or to other aspects pertinent to the potential effects of the proposed project on the environment pursuant to CEQA. Comments that address topics beyond the purview of the Draft EIR or CEQA are noted as such for the public record. Where comments have triggered changes to the Draft EIR, these changes appear as part of the specific response and are consolidated in Chapter 3 (Changes to the Draft EIR), where they are listed in the order that the revision would appear in the Draft EIR document.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

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October 11, 2012

MRN101427
MRN-101-8.6
SCH#2011092057

Mr. Ron Peluso
Marin Healthcare District
100B Drakes Landing Road, Suite 250
Greenbrae, CA 94904

Dear Mr. Peluso:

Marin General Hospital Replacement Building Project – Draft Environmental Impact Report

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the Marin General Hospital Replacement Building Project. The following comments are based on the Draft Environmental Impact Report (DEIR).

Highway Operations

The existing volumes used in the DEIR appear to be significantly lower than the volumes in the Caltrans database. Please provide the source, including dates, of the traffic volumes used in the DEIR.

A-1

Please include the Existing plus Project scenario in the analysis.

A-2

The DEIR includes operational analysis of a portion of the Sir Francis Drake/US-101 interchange. The DEIR must include analysis of the entire interchange since the project will impact the entire interchange.

A-3

Page 4.M-15 states that freeway segment operations for the proposed project are based available Caltrans data and the US101 Greenbrae Corridor Study. However, the DEIR should clearly state that traffic volumes used for intersections were from 2006, and the traffic volumes used for freeway segments were from 2010.

A-4

On page 4.M-16, existing operations of freeway segments are incorrect. The number of lanes does not match existing condition.

A-5

Please analyze and discuss the left turn queue lengths at Intersections #9 (US 101 Southbound Ramps/Sir Francis Drake Boulevard) and #10 (US101 Northbound Ramps/Sir Francis Drake Boulevard). If existing storage lengths cannot accommodate the queue generated the proposed project, please mitigate these impacts by providing additional storage length at these intersections

A-6

"Caltrans improves mobility across California"

Mr. Ron Peluso/Marin Healthcare District
October 11, 2012
Page 2

Please provide the Synchro analysis for our review.

| A-6
| cont.

Should you have any questions regarding this letter, please call Yatman Kwan, AICP of my staff at (510) 622-1670.

Sincerely,



ERIK ALM, AICP
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Letter A Response – Department of Transportation

A-1: The existing traffic volumes used in the transportation analysis were based on new data collection conducted during the project analysis and on previous data collection by the County of Marin and Fehr and Peers Transportation Consultants. In all cases, the most conservative traffic volume data was used for analysis purposes. For mainline freeway volumes, the following source (cited in the Draft EIR) was used:

Fehr & Peers, Highway 101 Greenbrae Corridor—Year 2035 Traffic Forecasts, Memorandum Matt Haynes (Fehr & Peers) to Phil Cox (Caltrans), May 4, 2009.

At the time of the Draft EIR project analysis, the 2009 *Highway 101 Greenbrae Corridor* analysis was one of the most recent documents to analyze mainline volumes along U.S. 101 (Highway 101) in the project study area. However, volumes used in that document were counted in the year 2006. A review of the Caltrans mainline volume data for Highway 101 indicates that for the most recent years available (2008-2011), mainline volumes in the study area have declined every year since 2008. Therefore, mainline freeway volumes for Highway 101 used for the Draft EIR project analysis are conservative, and impact findings in the Draft EIR transportation section would not have changed if more recent mainline volumes from Caltrans' data base were used.

A-2: An Existing plus Project analysis was conducted and presented on page 4.M-33 of the Draft EIR.

A-3: The project analysis evaluated the two signalized intersections at the Sir Francis Drake Boulevard / Highway 101 interchange, the Highway 101 southbound on-off ramps / Sir Francis Drake Boulevard and the Highway 101 northbound on-off ramps / Sir Francis Drake Boulevard. Intersection level of service (LOS) for all “with project” scenarios (i.e., existing plus project, Year 2018 plus project, and Year 2035 plus project) were analyzed in the Draft EIR. Mainline volumes on Highway 101 immediately north and south of the interchange were also evaluated for all “with project” scenarios. With respect to analysis of the entire interchange, other than the signalized ramp intersections, the proposed project would only add traffic volumes to the “free-flow” (uninterrupted, no signal) northbound connector ramp to westbound Sir Francis Drake Boulevard and the “free-flow” southbound ramp connectors to/from Highway 101, and no analysis of project impacts is warranted.

A-4: Please see response to Comment A-1.

A-5: The commenter does not specify what is incorrect with the description of existing freeway operations, other than that they disagree with the number of lanes in Table 4.M-5 on page 4.M-16 of the Draft EIR. To clarify, while freeway segment lanes include mixed-flow and high occupancy vehicle (HOV) lanes, Table 4.M-5 (number of lanes, traffic volumes, and PM peak hour LOS) refers to mixed-flow operation only and does not

include HOV lanes. HOV lanes have 20 percent less capacity (on average) than mixed-flow lanes. HCS 2000 software (Basic Freeway Segments) does not account for mixed-flow and HOV lanes in overall capacity calculations. Therefore, only mixed-flow volumes were used for capacity analysis. The Highway 101 freeway segment north of Sir Francis Drake Boulevard has four mixed-flow lanes and one HOV lane in the northbound direction and three mixed-flow lanes and one HOV lane in the southbound direction. Between Sir Francis Drake Boulevard and Tamalpais Drive, the northbound Highway 101 freeway segment has three mixed-flow lanes and one HOV lane. The southbound segment has four mixed-flow lanes and one HOV lane. South of Tamalpais Drive, there are four mixed-flow lanes and one HOV lane in each direction. Stated freeway segment LOS findings in the Draft EIR would remain unchanged and are likely conservative given lane capacity adjustments for the southbound direction between Sir Francis Drake Boulevard and Tamalpais Drive (one additional mixed flow lane for the southbound direction).

- A-6: **Highway 101 Southbound Off-ramp, Eastbound.** Based on the proposed project trip assignment, the project would not add traffic volumes to the signal controlled Highway 101 southbound off-ramp (left-turn movement, toward the ferry terminal) intersections at Sir Francis Drake Boulevard, so a queuing analysis is not relevant to potential project impacts. However, per the commenter's request, a vehicle queuing analysis was conducted for the eastbound left-turn movements from Sir Francis Drake Boulevard onto the Highway 101 northbound on-ramp. Current storage capacity for the eastbound dual left-turn lanes from Sir Francis Drake Boulevard onto the northbound Highway 101 on-ramp is approximately 460 and 585 feet for the two lanes, respectively. Based on traffic volumes under existing plus project, Year 2018 short-term plus project, and Year 2035 cumulative plus project conditions, the eastbound left-turn movement at the Highway 101 northbound on-off ramps/Sir Francis Drake Boulevard could be accommodated within the existing storage capacity of the left-turn lanes (see Synchro-Simtraffic Vehicle Queuing Reports in **Appendix A** to this Final EIR). These left-turn storage lanes extend back (west) through the Highway 101 southbound off-ramp intersection and provide approximately 460 and 585 feet of storage capacity on the two lanes, respectively. Vehicle queuing sheets indicate that the left-turn queue would extend about 420 feet under Year 2035 cumulative plus project conditions.

Highway 101 Southbound Off-ramp, Westbound. Based on the proposed project trip assignment, the project would add traffic volumes to the signal controlled Highway 101 southbound off-ramp movement to westbound Sir Francis Drake Boulevard (toward Marin General Hospital). This southbound off-ramp splits after leaving the freeway to provide either eastbound (discussed above) or westbound directional flow onto Sir Francis Drake Boulevard. The westbound ramp is "free-flowing-merge" (no signal control) for the westbound movement and signal controlled for the eastbound movement.

Based on the Highway 101 Greenbrae/Twin Cities Corridor Improvement Study, the recommended improvement for this off-ramp is to widen it from the freeway to

two lanes continuing this configuration for the eastbound flow of the southbound off-ramp (again, to which the proposed project would not be adding any trips). The Highway 101 Greenbrae/Twin Cities Corridor Improvement project plans are shown on the following page. The expansion of Mitigation Measure TRA-7 in the Final EIR further addresses mitigation measures at the Eliseo Drive/Sir Francis Drake Boulevard which would help to improve the southbound Highway 101 exit onto Sir Francis Drake Boulevard (see response to Comment D-20).

Fairshare Contributions. Because the Highway 101 southbound off-ramp movement includes both the eastbound and westbound flows when leaving the freeway onto Sir Francis Drake Boulevard, the proposed project's fair share is calculated as follows (for Design Year 2035 Build Alternative Peak Hour Demand Volumes; TAM, Highway 101 Greenbrae/Twin Cities Corridor Improvements, Project Approval/Environmental Document, Final Traffic Operations Report, April 12, 2012.)

AM Peak Hour:

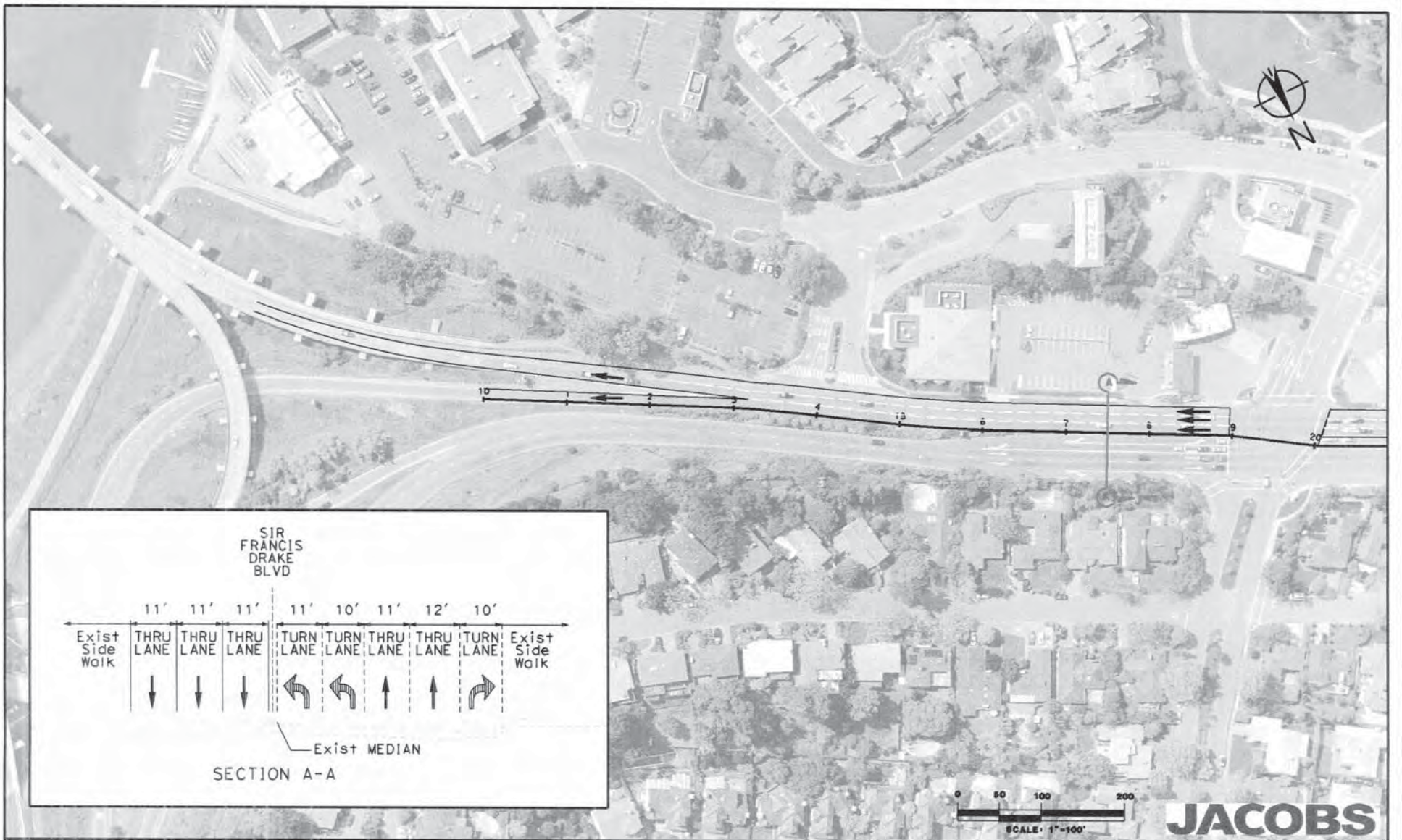
Highway 101 Southbound ramp volume:	1,970
Project contribution:	112
Project percentage (fair share):	5.68%

PM Peak Hour:

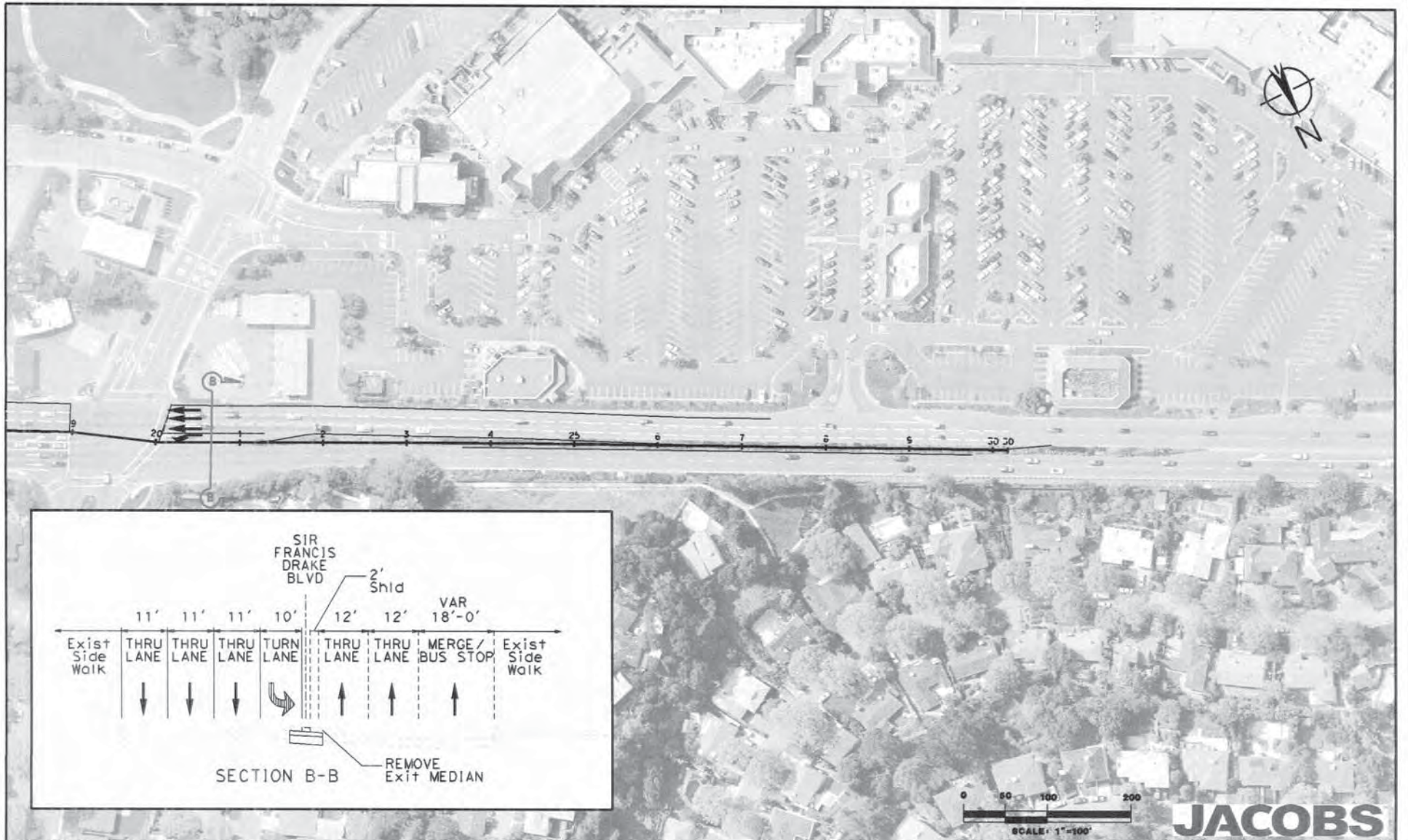
Highway 101 Southbound ramp volume:	1,150
Project contribution:	51
Project percentage (fair share):	4.43%

Given the small percentage contribution by the proposed project, it is not appropriate to require the project applicant to build the improvements. The expanded Mitigation Measure TRA-7 requires fair share contributions by the project applicant (see response to Comment D-20).

5-7



5-8





State of California – The Natural Resources Agency
DEPARTMENT OF FISH AND GAME
Bay Delta Region
7329 Silverado Trail
Napa, CA 94558
(707) 944-5500
www.dfg.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



October 12, 2012

Mr. Ron Peluso
Marin Healthcare District
100B Drakes Landing Road, Suite 250
Greenbrae, CA 94904

Dear Mr. Peluso:

Subject: Marin General Hospital Replacement Building Project, Draft Environmental Impact Report, SCH #2011092057, Marin County

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report (EIR) for the Marin General Hospital Replacement Building Project (Project). DFG is providing comments on the draft EIR as a Trustee Agency and Responsible Agency. As Trustee for the State's fish and wildlife resources, DFG has jurisdiction over the conservation, protection, and management of the fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of such species for the benefit and use by the people of California.

The proposed project consists of the phased development of the Marin General Hospital to include a 412-space Hillside Parking Structure, a 507-space Bon Air Road Parking Structure, a 100,000-square-foot Ambulatory Services Building, and a 300,000-square-foot Hospital Replacement Building.

The Project would also renovate existing wings of the hospital and involve new and relocated utilities to serve existing and proposed buildings within the overall Project site.

Approximately 15,500 square feet of existing ancillary buildings on the Project site would be demolished, and the Project would remove portions of existing historic landscapes.

The major components of the Project will be developed in six phases over a period of approximately eight years (approximately through 2020).

Comments

The draft EIR should recognize that the California clapper rail, California black rail, and salt marsh harvest mouse are fully protected species protected under Fish and Game Code Sections 3511 and 4700. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research. Fish and Game Code Section 3503 states that it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided in the Fish and Game Code.

B-1

Mr. Ron Peluso
October 12, 2012
Page 2

Due to the difficulty in determining what construction activities would result in a 10 decibel increase and to ensure there is no disturbance to fully protected species, DFG recommends that Mitigation Measure BIO-4a be changed to state that all construction activities occurring during of the rail breeding season shall install a noise attenuating fence along the edge of the construction site.

B-2

In addition, DFG recommends having a qualified biologist on-site daily during all Project construction activities during the California clapper rail breeding season to ensure that noise levels are below levels that would impact California clapper rail. DFG also recommends that the biologist be authorized to stop construction if noise levels exceed 10 dBA over existing ambient noise levels. Consultation with DFG should be required before re-commencing work after a noise level stoppage.

B-3

DFG recommends that Mitigation Measure BIO-3a be changed to include language that requires another focused survey for active nests if construction stops for a period of seven days or longer or if the construction does not begin within the immediate area within seven days of the initial survey. If active nests are found, consultation with DFG will be required before Project work can be reinitiated.

B-4

If you have any questions, please contact Mr. Timothy Dodson, Environmental Scientist, at (707) 944-5513 or by email at tdodson@dfg.ca.gov; or Ms. Karen Weiss, Senior Environmental Scientist, at (707) 944-5525.

Sincerely,



Scott Wilson
Acting Regional Manager
Bay Delta Region

cc: State Clearinghouse

Letter B Responses – Department of Fish and Wildlife

- B-1: The Draft EIR discusses the regulatory context set by the California Fish and Game Code, specifically Sections 3511, 4700 and 3503 cited by the comment, in the Biological Resources section of the Draft EIR (page 4.C-14). The Draft EIR also recognizes that the species identified by the commenter are fully protected species under the Fish and Game Code; as discussed on page 4.C-6 of the Draft EIR. Appendix E to the Draft EIR provides comprehensive lists of the special-status species that have been documented from, or have potential to occur in suitable habitat within, the project area: California clapper rail is documented on Appendix E pages E-3, 6 of 7, and 2 of 10; California black rail is documented on Appendix E pages E-3 and 4 of 7; Salt marsh harvest mouse is documented on Appendix E pages E-3, 6 of 7, and 3 of 10.
- B-2: Mitigation Measure BIO-4a on page 4.C-29 of the Draft EIR is modified as shown below. The proposed revisions are generally consistent with those developed with the County of Marin in response to the *College of Marin's Child Study Center Draft EIR* (2012), regarding that project's proposed construction mitigation strategy for potential impacts specifically to the endangered California clapper rail:

Mitigation Measure BIO-4a: (Applies to major noise generating construction and/or demolition phases occurring within 200 feet of Creekside Marsh, as delineated in the Mitigation Monitoring and Reporting Program Attachment 1) To ensure project construction activities do not that would exceed existing ambient noise levels (as documented by long-term noise measurement LT-3, as shown in Figure 4.J-1R provided in the Final EIR, to be 60-69 dBA Leq, as stated on page 4.J-5 of the Draft EIR) at Creekside Marsh by over 10dBA will avoid and minimize adverse effects on California clapper rail reproductive success through one of the following measures:

- a) Project construction activities shall take place September-January, outside the clapper rail breeding season of February through August); or
- b) Consistent with Mitigation Measure NOI-32 in Section 4.K, Noise, noise reduction measures, including solid plywood fences, sound blankets, or other barriers with noise-dampening materials shall be constructed along portions of the western edge of the project site prior to initiation of construction to serve as noise attenuation barriers. Noise barriers shall be installed on the project site in all locations within 200 feet of the Corte Madera Creekside Marsh and grassland buffer (as delineated in Attachment 1 to the Mitigation Monitoring and Reporting Program and consistent with Figure 4.C-2R [in the Final EIR] supporting Mitigation Measure BIO-6). The barriers shall shield the marshes from major noise generating phases of demolition and construction and will serve to attenuate noise emanating from the project site so any direct or reflected noise would not create increases greater than 10 dBA above current ambient levels in the marshes, where there may be breeding California clapper rails. The fencing noise attenuation barrier shall be a minimum of 8 feet in height, but sufficient in height to reduce any noise from construction on upper stories or building rooftops.

To ensure these noise attenuation barriers prevent significant impacts to breeding California clapper rails, a qualified biologist and noise technician shall periodically monitor noise levels at the edge of Creekside Marsh at least four times per month during the duration of construction within the breeding season.

As an extra measure, the District shall retain a qualified biologist and noise monitor to monitor noise conditions at least four to five times during the month of January. The noise monitoring shall coincide with construction activities anticipated to produce the loudest noise. If sound levels are measured that exceed 10 dBA above ambient noise conditions, construction shall be temporarily halted and the contractor shall assess whether other work that would not exceed this threshold can be conducted during the phase of work. If no other construction can occur, work shall not re-commence until consultation with USFWS and CDFW occurs.

Mitigation Measure BIO-4b: Implement Mitigation Measure NOI-~~3~~2.

The combination of Mitigation Measure ~~NOI-3~~NOI-2 from Section 4.1J, *Noise*, and the aforementioned Mitigation Measure BIO-3a, Mitigation Measure BIO-3b (if necessary), and Mitigation Measure BIO-4, will ensure that noise impacts of project construction will be minimized in the vicinity of active nests and will minimize and avoid potential adverse impacts on California clapper rail reproductive success at Creekside Marsh.

Significance after Implementation of Mitigation Measures: Less than Significant

B-3: See response to Comment B-2.

B-4: Mitigation Measure BIO-3a on page 4.C-26 of the Draft EIR is modified as shown below in response to the comment:

Mitigation Measure BIO-3a: (Applies to Phases I-IV) No more than two weeks in advance of any tree or shrub pruning, removal, ground-disturbing activity, or other construction activity that will commence during the breeding season (February 1 through August 31), a qualified wildlife biologist shall conduct pre-construction surveys of all potential nesting habitat in the vicinity of the planned activity.

If construction activities for the project cease for a period of seven days or longer, or if construction does not begin within the immediate area within seven days of the initial pre-construction surveys, the qualified wildlife biologist shall conduct another pre-construction survey.

Pre-construction surveys are not required for construction activities scheduled to occur during the non-breeding season (August 31 through January 31). Construction activities commencing during the non-breeding season and continuing

¹ Previously "California Department of Fish and Game" or "CDFG" at the time the Draft EIR was published. This revision is made throughout only where it affects mitigation measures and current discussion in this Final EIR.

into the breeding season do not require surveys (as it is assumed that any breeding birds taking up nests would be acclimated to project-related activities already under way).

If active nests are found on the site during construction, construction shall be temporarily halted and the consultation with the State Department of Fish and Wildlife will be required before re-commencing construction activities. Nests initiated during construction activities would be presumed to be unaffected by the activity, and a buffer zone around such nests would not be necessary. However, a nest initiated during construction cannot be moved or altered and the nests shall be clearly identified and the immediate area fenced to prevent destruction.

If pre-construction surveys indicate that no nests are present or that nests are inactive or potential habitat is unoccupied, no further mitigation is required. If active nests are found during pre-construction surveys, Mitigation Measure BIO-3b will be required.



ROSS VALLEY SANITARY DISTRICT
2960 Kerner Blvd
San Rafael, CA 94901
(415) 259-2949 ~ rvsd.org

October 3, 2012

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

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR
THE MARIN GENERAL HOSPITAL REPLACEMENT BUILDING PROJECT;
APN: 022-010-34 AND 022-060-20**

Dear Mr. Peluso:

Thank you for providing Ross Valley Sanitary District (District) with the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Marin General Hospital Replacement Building Project (Project). The District has reviewed the materials included with the EIR. On behalf of the District, a public utility, our comments relate to Section 3.2.6, *Existing Site Constraints, Utilities and Services*, Section 3.7.7, *Utilities Work During Construction*, Section 4.G, *Hazards and Hazardous Materials*, and Section 4.N, *Utilities and Service Systems*. Please incorporate the following information on existing and abandoned sanitary sewer infrastructure prior to preparation of your next draft of the EIR.

C-1

General

In general, the document refers to the District as "Ross Valley Sanitation District" throughout the document, which is not correct. The District's name is "Ross Valley Sanitary District, also known as Sanitary District No. 1 of Marin County".

C-2

Connection to System

This Project will add sewer flow contributions (in terms of Equivalent Dwelling Units, or "EDUs") to the District system. Moreover, the Project private sewer laterals will be relocated, modified, and upsized as part of this project (as stated in the DEIR). The applicant must apply for a new Sewer Connection Permit with the District to perform work on the private sewer laterals, not an "Application of Capacity" as indicated on page 4.N-13, paragraph 4. The private sewer laterals must be designed and constructed per District Standards.

C-3

Sanitary Sewer Infrastructure

The District has existing sanitary sewer infrastructure located within the boundaries of, upstream (south) and downstream (east) of the Project site. This infrastructure includes an upstream pumping station; 8-inch diameter pressure pipe (force main), a force main

C-4

discharge manhole, and a gravity sewer system with 12-inch diameter sewer main and manholes located on the project site, in front of the Project site in Bon Air Road, and in Bon Air Road downstream of the Project site; The District's existing sanitary sewer infrastructure will be directly affected by construction of the Project.



C-4
cont.

The existing force main is 8-inch diameter, primarily constructed of asbestos cement pipe (ACP) and high-density polyethylene (HDPE), not 12-inch diameter as indicated in Section 3.7.7 and Chapter 4.N. The force main was relocated out of the original right-of-way as part of the hospital project in the 1980's, contrary to page 4.N-1, paragraph 2. The force main discharges to the 12-inch diameter gravity sewer main at the manhole on the north corner of the existing parking lot under the proposed parking garage, not in the right-of-way as indicated in Chapter 4.N, page 4.N-2.

The portion of the existing force main to be realigned by the Project is primarily HDPE, with some ACP. There is also an abandoned 8-inch diameter ACP sanitary sewer force main within the Project site along the former alignment of Bon Air Road, which may be encountered and need to be removed during the Project. Handling and disposal of the ACP was not specifically addressed in Section 4.G with asbestos.

C-5

The District requires daily routine as well as 24-hour emergency access to the pump station (PS25) at 1350 South Eliseo Drive (intersection with Bon Air Road) and the access route for the Kentfield Force Main and PS 15 Kentfield Pump Station from Bon Air Road at South Eliseo Drive along the path on the south side of Creekside Park (the Corte Madera Creek pathway). All access points to the path, and the path itself, must remain accessible to District and emergency vehicles throughout construction of your project.

C-6

Utilities Work During Construction

As existing District sewer infrastructure will need to be constructed, modified, or re-aligned for the Project, a public sewer extension (PSX) permit must be applied for and acquired from the District. The design and construction must be prepared and installed and tested per the then-current District Standard Specifications and Drawings. All required easements shall be District standard 15 feet on center of pipe. The easement would not be "RVSD-granted" as indicated on page 4.N-13, paragraph 4.

C-7

The District will require an engineered design; including pipe alignment, pipe capacity, and trench detail; and evaluation of potential pump station improvements due to the change in force main length and discharge conditions; be prepared and submitted to the District for review as part of the PSX permit required for the Project. The District requests a schedule of this design for review as soon as possible.

C-8

This design shall include evaluation of approximately 625 feet of existing gravity sewer main downstream of the force main discharge manhole on the Project site to the connection to the trunk sewer at 350 Bon Air Road and Via Hidalgo. The change in the force main discharge location and increased sewer flows from the Project may require upgrading this existing gravity sewer main system on the property and in Bon Air Road as part of the PSX permit. This potential improvement was not addressed in Section 3.7.7 or Chapter 4.N.

C-9

Please also see our request for clarification, below.

Clarification Requested

Due to insufficient plan information, inaccuracies, inconsistencies and conflicting statements regarding force main and gravity sewer realignment within the Draft EIR, the District requests clarification of the following conflicting items within the EIR:

Page 3-66, *Sanitary Sewer*

"The publicly owned sanitary sewer main owned by Ross Valley Sanitation [sic] District would require realignment of the existing sanitary sewer pipe and modification to the existing pressure pipe.

The proposed project would relocate a portion of an existing 12-inch sanitary sewer force main into the Bon Air Road public right of way..."

C-10

Page 4.N-13

"The project would require relocation of the about 580 linear feet of the existing 12 inch sanitary sewer line into the Bon Air Road right of way..."

C-11

Page 4.N-14

"The existing force main would be altered, but not realigned."

C-12

Thank you again for providing us with this opportunity to review and provide comments on the EIR for the Marin General Hospital Replacement Building Project. Please feel free to call me at (415) 259-2949 x 212 if you have questions or would like to discuss this matter further.

Sincerely,

Randell Y. Ishii, M.S., P.E.
District Engineer

RYI: els

Letter C Responses – Ross Valley Sanitary District

C-1: The introductory non-CEQA comment is noted.

C-2: The following changes are made on Draft EIR page 3-66:

The publicly-owned sanitary sewer main is owned by Ross Valley ~~Sanitation~~ Sanitary District (RVSD) and the project would require the realignment of the existing sanitary sewer pipe and modification to the existing pressure pipe.

The following changes are made on Draft EIR page 3-69:

- Ross Valley ~~Sanitation~~ Sanitary District (RVSD)

C-3: The project applicant will apply for, secure, and comply with all applicable permit applications and requirements necessary for the project. (See response to Comment C-7.)

C-4: The comment information regarding existing RVSD facilities is incorporated starting on Draft EIR page 4.N-2. See the detailed edits in Chapter 3 (Changes to the Draft EIR). The changed details of existing pipes do not alter the EIR conclusions.

C-5: The discussion of handling and disposal of asbestos and specifically asbestos cement pipe (ACP) is expanded on Draft EIR pages 4.G-11 and 4.G-21. See the detailed edits in Chapter 3 (Changes to the Draft EIR) in this Final EIR. As discussed there, existing regulations cover the appropriate management and disposal of ACP that would protect workers from harmful exposures to these substances during construction activities and prevent contamination of surrounding soil or water. With compliance with existing laws and regulations, the project would not have a significant impact.

C-6: The comment information regarding the RVSD-facilities access requirements that the project must ensure is incorporated at the top of Draft EIR page 4.N-14. See the detail edits in Chapter 3 (Changes to the Draft EIR).

C-7: The comment information regarding the requirement for the project to apply for, obtain from RVSD and adhere to a Public Sewer Extension (PSX) permit for the project, as well as specific permit application and design requirements for that permit, is incorporated starting on Draft EIR page 4.N-13. See the detail edits in Chapter 3 (Changes to the Draft EIR).

C-8: See response to Comment C-7.

C-9: See response to Comment C-7. Also, the changed detail of the potential need to evaluate approximately 625 feet of existing gravity sewer main does not alter the conclusions in the Draft EIR. Should that evaluation lead to the need for additional construction/ excavation activity (which is not anticipated, since, based on current capacity levels and

wastewater treatment rates, it is anticipated that these service providers would have sufficient capacity to convey and treat the wastewater generated by the project, per Draft EIR page 4.N-15), adequate mitigation measures are already identified throughout the Draft EIR (see response to Comment D-7).

C-10: See response to Comment C-2. The comment is accurate.

C-11: See response to Comment C-4 and detail edit in Chapter 3 (Changes to the Draft EIR).

C-12: See response to Comment C-4 and detail edit in Chapter 3 (Changes to the Draft EIR).

October 22, 2012

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

Via email: ron.peluso@navigant.com

Subject: **Marin General Hospital Replacement Building Project Draft
Environmental Impact Report**
22-010-034 & 022-060-20
250 Bon Air Road, Kentfield or Greenbrae

Dear Mr. Peluso:

We would like to thank you for the opportunity to review and comment on the Marin General Hospital Replacement Building Project draft EIR (hereafter referred to as the document). Please find Marin County Department of Public Works' comments below:

GENERAL COMMENTS and ISSUES

- 1. **Work in the County's Bon Air Road right of way.** Bon Air Road is a County maintained road. An Encroachment Permit from the Department of Public Works (DPW) is required for any work within the road right of way. The EIR should more clearly and fully describe the extent of work in the County's Bon Air Road right of way to better evaluate the potential impacts of the project, to vehicular traffic, to pedestrian, cyclist and driver safety; and to physical condition of the road surface, and determine and discuss the appropriate mitigations.
 - a. The Project Description should list and fully describe all work proposed in the County's Road right of way, including the relocating utilities (name each utility); widening the northern driveway; adding a new hospital driveway; providing median cuts and turn pockets; installing two new traffic signals; landscaping; sidewalk improvements; signage; removing public parking spaces; physical damage to the road surface from construction traffic and utility work; and necessary road reconstruction, and providing traffic control and safe accessible pedestrian access along Bon Air, and the relocation and new construction of bus shelters for Golden Gate Transit bus stops.

D-1
↓

Comment Letter D

- b. Discuss cumulative impacts of temporary construction activity which will accelerate degradation of County roads, and proposed mitigations.
- c. Impact TRA-2 discusses that the project is to include the removal of 4 to 5 parking spaces from Bon Air Road to improve site distance and to accommodate new hospital access driveway. Removal of these spaces is subject to review and approval or conditional approval by Marin County Board of Supervisors. A parking demand analysis for the public parking on Bon Air shall be provided and whether the elimination of four to five parking needs to be mitigated and provided elsewhere.
- d. Clearly indicate if there are any new street lights proposed.
- e. Document does not provide a discussion regarding potential disruptions to public transit services including the potential disruptions or relocation of the existing bus stop. Document shall indicate how the existing bus stop along Bon Air north of the north driveway access may be effected during and after construction. It is not clear if existing bus stop will be displaced and what impact this may have on riders and ridership.
- f. The above comments regarding Bon Air Road should also be addressed in both 4.N Utilities & Service Systems and in section 4.M Traffic & Circulation as appropriate.

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D-1
cont.

2. **Parking.** The spaces in the right of way are not for the exclusive use of MGH; mitigation TRA-2 might not be approved (high demand from park, Bay Club, etc.). The document does not address how parking spaces removed will be compensated or mitigated.

D-2

3. **Construction Management.** Potential impacts of the project during the construction phase, even those which will be temporary, should be evaluated now to determine mitigations which will address safety, pedestrian and vehicular access, parking, emergency access, traffic control and road impacts (both traffic and physical). Elements of the Construction Management Plans should not be delayed until design review. The document should describe both the temporary and cumulative impacts from construction. The Draft EIR does not indicate how the Golden Gate Transit riders who use the existing bus stop north of the north driveway and other pedestrians will be accommodated during construction when the north entrance to the site will be used as the construction entrance. Only the Marin County Board of Supervisors can approve a temporary road closure of Bon Air Road.

D-3
D-4
D-5

4. **Accessibility.**

- a. Project needs to clearly describe how accessible access will be maintained and improved to the site and through the campus, both during and after construction.
- b. The Marin County Crisis Clinic, located on the grounds of Marin General Hospital (MGH), currently has a single accessible path of travel between its first and second floors. This path of travel requires entering the hospital and using their elevator to reach a "sky bridge" pedestrian walkway to reach the Crisis Clinic's second floor programs.
Should the new construction plans for MGH include removal of this sky bridge, this will result in there being no accessible path of travel between the floors of the Crisis Clinic which will create a violation of the program access requirements of Title II of the Americans with Disabilities Act. This should be consider a direct potentially significant project impact unless mitigated, as this would potentially deny program access and violate civil rights to a certain segment of the population. A potential mitigation measure would be to construct an elevator to serve the second floor, or otherwise add to the project a compliant path of travel to access those services.

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D-6
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c. There currently is no compliant accessible path of travel from the small parking area that serves the County mental health facility and its entrances (front or rear). It appears that the addition of the hillside parking structure may remedy this for the lower floor, however due to the absence of an elevator in this facility, an elevated path of travel (POT) to the second floor or addition of an elevator will be required as public programs and services are provided on both floors. At this point it is unclear whether an elevated POT is planned.

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D-6
cont.

5. **Utilities.** Section 4.N states that the relocations of the utilities is part of the project and “therefore, the potential construction related environmental impacts are assessed and mitigated as warranted throughout the impact analysis in Chapter 4 of this Draft EIR”. Clearly indicate where the evaluation of the potential construction related impacts of work in the right of way, physical trenching and impacts to the road are discussed. Draft EIR repeatedly suggests that Construction Management will be deferred to Design Review, but it should be discussed now to evaluate all the impacts and determine appropriate mitigations for the physical impacts to the road; disruptions to normal traffic and travel patterns for drivers, transit, cyclists and pedestrians; and the construction related dangers posed by the project to pedestrians, cyclists and drivers. The existing traffic indices of Bon Air and Sir Francis Drake will not support the proposed construction and construction related traffic, therefore pavement shall be fully restored upon completion of construction.

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D-7
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D-8

6. **FEMA.** Clearly, consistently and correctly reference actual mapped areas from FEMA’s FIRM Map 06041C0458D effective May 4, 2009. Entire site is Zone X, though there is a portion that is Zone X Other Flood Areas, which is described in the legend as areas of 0.2% annual chance flood or area of 1% annual chance flood with depths of less than 1 foot or with drainage areas less than 1 square. Section 3.2.6, page 3-13 states that “no portion of the project site is within the 100 year flood area”; document should instead reference FEMA’s Flood Insurance Rate Maps (FIRM) designated Flood Hazard Areas.

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D-9

7. **Mitigation Measures.** All measures should indicate that the Lead Agency or MHD remains responsible for ensuring that the implementation of the measures occurs according with the program. Mitigations should all have an identified responsible party for monitoring and oversight. Several mitigation measures in this document incorrectly assign the County of Marin as the responsible party. Several MM do not provide clear thresholds for monitoring, nor details regarding means of enforcement. It may be appropriate for MHD to appoint a construction manager to oversee, implement, monitor and enforce conditions of mitigation measures and conditions of approval specifically related to temporary construction related activities.

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D-10

SPECIFIC COMMENTS

8. The draft document is inconsistent in its representation of the project site. Site location and representation is not clear nor is consistently portrayed in the document.
 a. There are instances where the project site is depicted as the area of disturbance (Figure 3-2, Figure 4.A-1, Figure 4.J-1), other instances where it is shown as the assessor parcels which make up the project (Figure 3-4 and most other site drawings), and at least one instance where no delineation of the site is provided (Figure 4.H-1). DPW suggests the parcel boundaries be used to define the project site.

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D-11
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b. The project is in unincorporated Marin, in the vicinity of the communities of Kentfield and Greenbrae, and adjacent to the City of Larkspur. The document is inconsistent and refers to the project being between Kentfield and Greenbrae, and as being in Greenbrae (note that the hospital website indicates that they are located in Greenbrae). Document should consistently describe the location of the facility. Additionally, DPW suggests the location map, or the aerial of Project Site and Surroundings (figure 3-2), show and label the boundary between unincorporated Marin and Larkspur.

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D-11
cont.

9. The draft document is inconsistent in its discussion of the timing for the installation and activation of the proposed traffic signal at the southern driveway. Page 2-2 in the Summary discusses its installation to be at a later phase when warranted, but other places in the document state that it will be installed at Phase V or Phase VI.

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D-12
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10. CHAPTER 3

- a. Section 3.5.1 Project Overview, page 3-17, it appears that the 20+ foot high retaining walls are for retaining hillside, not specifically the parking structure.
- b. Section 3.5.3, Phase I on page 3-37 should also mention Encroachment Permit for driveway widening and installation of a new traffic light, and any other work to be performed in the county road right of way. Summary of Phase II mentions it for the utility relocation and median cut.
- c. Section 3.5.5 Sustainability Elements. If project included administrative controls to reduce single rider vehicle traffic during peak hours, it should also be presented here. (carpooling incentives, fee parking, etc.).
- d. Section 3.6.1 Site Access and Circulation. Document does not clearly indicate if design for ambulance access has been coordinated with emergency responders and County Parks, nor does it provide information regarding designed turning radii for the turn pockets.
- e. Section 3.6.1, page 3-44 Document does not indicate if control will be provided for pedestrian crossing at southern entrance before activation of traffic signal. This could affect the level of safety provided to pedestrians crossing at this location.
- f. Section 3.6.2 Parking Supply at Build-out. Document is inadequate for lack of information. Document should show, label and number the off-site public parking spaces along Bon Air Road, and clearly indicate which of these the project is proposing to eliminate, for either site distance or for new driveway cuts. This will provide a more comprehensive understanding of the public resource that project is proposing to eliminate. Document should better explain the value of public parking in this area and in relationship with Creekside Park.
- g. Section 3.6.6, page 3-51, indicates a conceptual Stormwater Control Plan, and refers to Figure 3-17, though no figure 3-17 is provided in the document (figures 3-17a through 3-17f depict Phases of construction activity). Provide a conceptual stormwater plan.
- h. Table 3-3 Construction Activities Schedule show work beginning in Q1 of 2013, which is different than statement in Section 3.7.1.
- i. Section 3.7.2, page 3-56 indicates that off-site contractor parking will be secured after phase 1 but does not indicate how use of off-site parking for contractors will be enforced. Document should also identify location of off-site parking.
- j. Section 3.7.7, page 3-66, document is incorrect when it states that the sanitary sewer will be the only utility to newly encroach in the right of way as it implies that it may be the only utility to be relocated into the right of way.

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D-13
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- k. Section 3.8.2 County of Marin: section should also include that grading permit for initial earth work associated with widening of the northern driveway will be required from the County of Marin DPW. Although MCC 23.08.030 allows for exemptions from obtaining a grading permit when work is incidental to a building permit, this project does not meet all the criteria for that exemption. A grading permit will be required.

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D-13
cont.

- 11. **Chapter 4** Table 4-1 listing other projects to consider for cumulative analysis should add the construction of the proposed new Marin Catholic stadium and related improvements, currently with Marin County CDA for design review.

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D-14

12. Section 4.B Air Quality

- a. AIR-2 does not indicate who is responsible for enforcement, where program is checked or evaluated, or if to be incorporated as part of the overall construction management plan.
- b. Page 4.B-16, Phase III, is incomplete and does not provide the quantity of earth movement, which has been provided for other phases.
- c. How are trips for deliveries calculated? Document only seems to discuss off haul of excavated earth.
- d. Traffic, page 4.B-21 should document what the hospital currently does to promote and encourage carpooling, transit, cycling as alternatives to single rider vehicle trips, and how will the district continue to encourage, and track the use of, these alternatives.
- e. Page 4.B-25 Bay Club should be considered as extended exposure receptor.
- f. Page 4.B-27 MM AIR-5 does not adequately described how this will be enforced.

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D-15

13. Section 4.E Geology, Soils and Seismicity

- a. Document should provide or indicate availability of Furgo West reports reference in this section.
- b. Page 4.E-23 states that retaining walls of at least 30 feet. Document is inconsistent because elsewhere document states retaining walls up to 25 feet. Clarify actual anticipated height.

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D-16

14. Section 4.F Greenhouse Gases

- a. IMPACT GHG-1 should indicate GHG emissions for existing operations, and add that to the estimated construction GHG emissions. That total, not just the construction value, should be compared to the threshold of 1,100 annual metric cubic tons.
- b. Page 4.F-11 traffic should evaluate existing plus construction plus phased operational uses.
- c. IMPACT GHG-2, page 4.F-12, Transportation Demand Management (TDM) does not explain how offering a valet service reduces greenhouse gas emissions. Vehicles are still driving to the project vicinity.
- d. IMPACT GHG-2 page 4.F-14 states that most of the emissions are associated with hospital generated traffic. The document should provide more thorough exploration of means to reduce single rider vehicle trips, such as administrative controls. MM GHG-2 does not mention any incentives for participation. Incentives should be described.
- e. MM GHG-2 responsibility to monitor this mitigation measure should not be assigned to the County of Marin; applicant is responsible for implementing and verifying compliance with this mitigation measure. For a larger scale project such as this, a

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D-17
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TDM coordinator is assigned, goals are established and the coordinator reports back to management.

- f. MM GHG-2(d) this program is not available beyond County employees; applicant is responsible for creating and implementing their own program.
- g. MM GHG-2 does not indicate how effectiveness of programs will be measured. Page 4.F-17 states that the “effectiveness is heightened” because response to survey not because of already documented success. This statement is confusing as there is no documentation provided to demonstrate existing success with this program.
- h. IMPACT GHG-2 should really be repeated in TRAFFIC as the project is impacting traffic, which in turn is impacting greenhouse gas. If traffic was better managed, greenhouse gas impacts would be lessened.

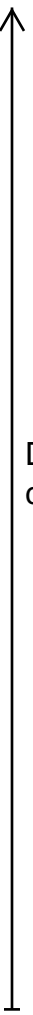
D-17
cont.

15. Section 4.H Hydrology and Water Quality

- a. This section incorrectly concludes that no mitigation is required. In fact the analysis describes various mitigations for construction and operations and these actions should be listed as mitigations, as without implementation, these would be the potential for significant impacts.
- b. The document should offer a conceptual stormwater management and drainage plan. Such a plan should be provided to show how existing drainage pattern will be maintained and what LID features are to be included in the project.
- c. Page 3-52, of section 3.6.6, refers to a conceptual Stormwater Control Plan presented in Figure 3-17, though no figure 3-17 is provided in the document. Figures 3-17a through 3-17f depict phases of construction activity.
- d. Figure 4.N-2 Proposed Utility Lines depicts a bio-swale to be constructed in one of the road medians in the Bon Air Road right of way. Use of the public right-of-way for private development mitigations is usually not permitted. Revise this drawing, and project if necessary, to place all stormwater mitigation on site.
- e. IMPACT HYD-1. Document section Construction is inadequate because although it states that there is the potential to violate water quality standards (pages 4.H-16 and -17), it does not identify that as an impact, nor offer mitigations to reduce those impacts to less than significant. Existing water quality protection measures do not reduce the impact to less than significant; implementation of the required measures and BMP’s reduce the impact to less than significant.
- f. Page 4.H-20 Remove bio-swale from ROW, reword 4.H-21
- g. Page 4.H-13, the second sentence in paragraph beginning “The Land Development Division...” should state “Countywide” MCSTOPP.
- h. Page 4.H-18, Operation, the first sentence should clarify “the project is replacing 239,124 square feet of impervious surface and creating 9,900 new square feet of impervious surface”.
- i. Page 4.H-18, the second paragraph should just state the county and remove MCSTOPPP from each of the first three sentences. Additionally, remove “that could convey pollutants” and “and that could cause erosion and sedimentation during operation”. Remove the remainder the last two sentences of this paragraph, from the sentence beginning “for example...” to the end of the paragraph.
- j. Page 4.H-18, the last paragraph should begin “Specifically” not “In addition”; please correct.
- k. Page 4.H-18, the first sentence of the last paragraph, “projects” should be plural, not singular; please correct.
- l. Page 4.H-18, the last paragraph, remove the third sentence, which beings “Potential erosion and sediment...”.

D-18

- m. Page 4.H-18, qualify LID measures as “LID stormwater treatment measures”.
- n. Page 4.H-18, in the sentence beginning “The following LID...” remove the following: “including” and everything from “, and planter boxes” to the end of the sentence.
- o. Page 4.H-18, the example in parenthesis should remove “implementing the relevant measures from the” and “and the MCSTOPPP”; it should just read “Phase II Permit Attachment 4 compliance”.
- p. Page 4.H-19 top of page should read “required by the County and attachment 4 of the Phase II permit”, not “SWRCB and the MCSTOPPP”; please correct.
- q. Page 4.H-20, Drainage Patterns. The following is suggested rewording of most of this paragraph:
- r. “The project would replace 239,124 square feet and would create 9,900 square feet of impervious surface. The increase in impervious surface, 9,900 square feet, represents approximately 2% of the project’s total existing impervious area. However, a site-specific Storm Drainage Report concluded that peak site run-off volumes would decrease from 266,340 cubic feet per second (cfs) to 265,832 cfs, as a result of implementation of LID design strategies as required by Marin County and Attachment 4 (KFPP, 2011). Peak runoff rates (for a 100 year storm event) would decrease from 53.80 cfs to 48.77 cfs. As discussed in the Regulatory Setting above, the County requires the project to incorporate LID design on previously developed sites when “5,000 square feet or more of impervious area is created or replaced.” If the impervious area being created or replaced is less than 50 percent of the existing total site area, “the requirements apply only to the addition.” The Marin Healthcare District campus has an existing impervious area of 530,678 square feet. Of that, the project is proposing to replace 239,124 square feet of impervious area and to creating 9,900 square feet of new impervious area. Since the project is creating and/or replacing only 47 percent of the existing impervious surface, stormwater treatment is provided for only the new and/or replaced impervious surface on the site.”
- s. The only comment on the remainder of this paragraph is that “MCSTOPPP” should be replaced with “County”.



D-18
cont.

16. Section 4.M Transportation and Circulation

- a. The Traffic Engineering Division has reviewed the Draft Environmental Impact Report (DEIR) for the Marin General Hospital Replacement Building Project. According to the DEIR the proposed project will generate over 4,700 Average daily trips many of which will occur on Sir Francis Drake Boulevard the main County arterial for West Marin. Our comments are as follows:
 - i. The DEIR’s assessment of impacts TRA-2 and TRA-5 is incomplete and inadequate. Although the DEIR identifies significant and unavoidable direct traffic impact to Sir Francis Drake Boulevard and three intersections along Sir Francis Drake Boulevard including the intersections at Wolfe Grade, La Cuesta Drive and Eliseo Drive, the DEIR does not identify or specify the amount of increased delay at the intersections and along the Sir Francis drake corridor the will be experienced as a result of the proposed project. The DEIR should assess and identify the amount of increased delay motorists will experience.
 - ii. The DEIR’s assessment of impact TRA-2 is incomplete and inadequate since mitigation measures that could be implemented to reduce the magnitude of the traffic impacts (increased delay) are not evaluated. Viable measures that could reduce the overall increased delay caused by the



D-19

D-20

proposed project should be assessed and implemented to the extent feasible. Mitigation measures that should be evaluated include the following:

1. Preparation of engineering plans and environmental documents to provide a third eastbound travel lane and contributions toward traffic signal enhancements to accommodate the third travel lane including revised traffic signal timing, mast arms and signal heads.
2. Provision of a separate park and ride lot and a shuttle of bus for employees and patrons of the hospital
3. Use of the ferry with transit or shuttle service to the hospital
4. Contributions toward the provision of upgraded A70 traffic signal controllers to allow for improved coordination between the main street (Sir Francis Drake Boulevard) and the side streets (Eliseo Drive, Wolfe Grade and La Cuesta).

D-20
cont.

iii. All identified traffic safety impacts under “Impact TRA-2,” should be implemented under Phase I and or by 2018 whichever comes first. The following are identified by the DEIR as a Traffic Safety Impact projects;

1. Northbound Bon Air Road shared thru and right turn lane to be widened to provide a separate thru and Right Turn lanes to reduce northbound Bon Air road delays and or congestion.
2. All necessary red zones needed for sight distance for the proposed driveways should be implemented during the first phase of the project.
3. Note, under traffic safety impact the applicant should identify the amount of sight distance needed along Bon Air Road and the impact it has on street parking.

D-21

iv. The DEIR assessment of TA-7 is incomplete and inadequate because mitigation measure to reduce the magnitude of significant cumulative traffic impacts to several sections of US 101 are not assessed. Although traffic impacts are identified as significant and unavoidable, mitigation measures to the extent feasible should be provided. Mitigation measures that should be considered include the following:

1. Contributions toward the U.S. 101 Greenbrae Twin Cities Corridor Improvement Project being implemented by the Transportation Authority of Marin (TAM)
2. Contributions toward the upgrading of traffic signal controllers that the Caltrans ramps from US 101 to Sir Francis Drake Boulevard to allow for better coordination between the ramps and traffic approaching and going onto Sir Francis Drake Boulevard.
3. The Transportation Authority of Marin (TAM) as the Congestion Management Agency should also review the document to help identify feasible traffic for Sir Francis Drake Boulevard and US 101 which are identified as Congestion management Program (CMP) arterials

D-22

v. Extensive Transportation Demand Measured should be evaluated and as part of the DEIR/proposed project. Development of a Transportation Management Plan should be made a condition of approval for the proposed project. Specific measurable and enforceable targets should be targets should be identified and established to reduce the overall added delay that will result from the proposed project. Specific measures that should be considered in this plan include the following:

1. Flexible work schedules for employees and contractors.

D-23

- 2. A reward or incentive program which will reward employees who commute a certain number of works days a week/month by modes other than the single occupant auto.
- 3. Cash incentives or credit towards time off or other similar incentives may be used in lieu of a cash award.
- 4. Provision of bike racks or bike lockers on site.
- 5. Preferred parking for carpoolers on-site.
- 6. A rideshare matching/info bulletin board, website our other effective means of facilitating coordination among potential employees interested in ridesharing.
- 7. Coordination of the development and implementation of the Transportation Management Plan with adjacent businesses and uses to improve the overall effectiveness of the programs.

Refer to MTC-ABAG resource library such as:

8. **Title: Analyzing the effectiveness of commuter benefits programs /**
 Imprint: Washington, D.C. : Transportation Research Board, 2005.
 Call no.: HE336 .P37,T779 no. 107 2005
 WWW: http://gulliver.trb.org/publications/tcrp/tcrp_rpt_107.pdf

9. **Title: Commuter choice primer : an employer's guide to implementing effective commuter choice programs.**
 Imprint: Washington, DC : U.S. Dept. of Transportation, Federal Highway Administration, [2003].
 Call no.: HE336 .P37,C662 2003
 WWW: http://www.itsdocs.fhwa.dot.gov/JPODOCS/REPTS_PR/ccp/CommuterChoicePrimer.pdf

10. **Title: Strategies for increasing the effectiveness of commuter benefits programs / ICF Consulting and others.**
 Imprint: Washington, D.C. : National Academy Press, 2003
 Call no.: HE4341 .T779 no. 87
 WWW: http://gulliver.trb.org/publications/tcrp/tcrp_rpt_87.pdf

- vi. The DEIR assessment of TRA-6 is incomplete and inadequate. The DEIR does not assess construction traffic impacts to intersection on Sir Francis Drake Boulevard that are currently operating at LOS E and LOS F. These include intersections with Wolfe Grade, La Cuesta Drive and Eliseo Drive. The truck routes should be identified. Truck trips during construction and deliveries should be limited to avoid the peak hours. In addition, during grading operations the proposed project will result in 120 truck trips per day for a period of four months during grading for the proposed project with additional truck trips during other times during construction. This will substantial deteriorate the existing pavement condition on Bon Air Road and section of Sir Francis Drake Boulevard. Contributions to offset the wear and tear on the pavement should be provided.
- vii. The DEIR's assessment of impact TRA-2 inadequate. The evaluation and review for the westbound Sir Francis Drake Blvd left turn pocket into Bon Air Road in the DEIR and traffic study is not complete. The left-turn queue, exceeds the storage length of the turning lane extension of the left turn storage from 285 feet to the required 356 feet is identified as a proposed mitigation measure. A conceptual striping layout plan should be provided to

D-23 cont.

D-24

D-25

identify and evaluate the feasibility of obtaining additional right of way to implement lengthen the turn pocket. The fact that additional right of way may need to be acquired does not in itself make a mitigation measure infeasible. The field investigation should include an exhibit of the lane configuration drawn to scale and with possible solutions such as median reduction, roadway realignment and lane configurations to achieve the desired left turn storage extension. In addition the length of queue and added delay that would be caused by the proposed project at this intersection should also be assessed and identified with and without the proposed mitigation measure.

D-25
cont.

viii. According to the DEIR the southernmost driveway along Bon Air Road will meet the traffic signal warrant in 2023, after the final phase of the project. Since the traffic signals for the two driveways to MGH are provided as part of the proposed project, the applicant should pay the full cost toward the signalization as an escrow account with the County. The escrow account will be kept with County earning interest until the signals are installed. Another financial mechanism identified and acceptable by the County may be utilized and conditions should be monitored by MGH so that the traffic signals can be installed when warranted.

D-26

ix. All identified traffic safety impacts under "Impact TRA-2," should be implemented under Phase I and or by 2018 whichever comes first. The following are identified by the DEIR as a Traffic Safety Impact projects;

- a. Northbound Bon Air Road shared thru and right turn lane to be widened to provide a separate thru and Right Turn lanes to reduce northbound Bon Air road delays and or congestion.
- b. All necessary red zones needed for sight distance for the proposed driveways should be implemented during the first phase of the project.

D-27

Note, under traffic safety impact the applicant should identify the amount of sight distance needed along Bon Air Road and the impact it has on street parking.

x. Encroachment permits will be required for any work within the road right of way and shall be obtained prior to the start of construction. Additional studies/plans shall be included with the encroachment permit application that address construction staging, truck routes, parking and pedestrian impacts during construction. Traffic control plan shall be included to address pedestrian and bicycle detours. Temporary traffic control plan should be included with advance warning signage to be placed to minimize doubling back for pedestrians and bicyclists. All signage type and locations within County ROW should be reviewed by the Department of Public Works through an encroachment permit application prior to approval of a temporary traffic control plan. The installation and maintenance of advance warning signs outside the immediate work area shall also require an encroachment permit from the County of Marin (areas within our jurisdictions).

D-28

b. TRA-6 discussion is inadequate because it only discusses excavation for phase I and does not address off haul from demolition, delivery of materials of two new multi-story parking decks, new hospital, new ambulatory services building, retaining walls and utility relocation.

D-29

c. TRA-2 Section is inadequate because it does not elaborate on potential impacts to safety of, and access for, pedestrians, valets, cyclists, transit and vehicular traffic

due to construction activities, which may include reduce lane width, controlled traffic or restricted travel ways, means to maintain emergency access throughout all phases of construction. Schematic drawings provided in section 4.N Utilities and Service Systems for the various phases of construction do not effectively describe how travel lanes will be impacted and how safety will be ensured. TRA-2 does not indicate how project will mitigate impacts to transit service. The document does not discuss disruptions to service, potential impacts to schedules, stop locations and possibly entire route, nor noticing to riders of these changes, and measures to ensure the safety of riders from the designated stops to the hospital or cross walks.

- d. TRA-2b is subject to review and approval by the County.
- e. IMPACT TRA-3 does not discuss emergency access during construction. Additionally, document does not discuss how turning radii for new turn pockets were determined, nor what they are. Both emergency responders and DPW will need to review and approve this information and roadway configuration.
- f. Page 4.M-39, the discussion of TRA-4 does not describe how the project would be beneficial and to what degree it would be beneficial. Given the proposed increase in traffic that the project will create and paucity of mitigation measures, it is unlikely the project will have any benefits to adopted policies, plans, or programs supporting alternative transportation.
- g. Discussion in section 4.M page 45 does not address deliveries of material to construct the parking decks and new buildings, the off haul of the demolished buildings nor specific restrictions to delivery hours.
- h. Page 4.M-46 incorrectly concludes impact as less than significant. The County anticipates, given the project scope, Sir Francis Drake and Bon Air Road will be damaged above and beyond normal wear and tear. The County suggests making the pavement restoration, to the County's satisfaction, of these two streets part of the scope of work.
- i. TRA-6 appears to be incomplete as it only discusses off haul of excavated material. This section should also discuss deliveries of material required to construct all aspects of the project, and should specify restricted hours for deliveries.
- j. TRA-6 offers an inadequate discussion on the potential impacts of construction traffic to the existing road surfaces along Bon Air Road and SFD, the identified truck route, as well as the degradation of Bon Air Road and Sir Francis Drake surface from utility work and new median cuts. Impacts should be identified and the document should offer specific mitigations, indicating the extent of pavement restoration and timing of this work. The County suggests making the pavement restoration, to the County's satisfaction, of these two streets part of the scope of work.
- k. Page 4.M-58 Identify where this off-site is and why not make this part of the permanent TMP to shuttle employees?

D-29
cont.

17. Section 4.N Utilities and Service Systems

- a. Figure 4.N-2 is inaccurate and inconsistent with the rest of the document as it depicts a new bio-swale being constructed in the county right of way in an existing median. This is not discussed elsewhere in the document and is not on the applicant's private property.
- b. IMPACT UTIL-5 figures 4.N-3 through 4.N-6 are schematic and do not offer sufficient detail for evaluation of potential impacts of traffic control measures, construction nor and mitigations to reduce impacts to safety.

D-30

Feel free to contact me at (415) 473-3770 if you have any questions.

Sincerely,

Berenice Davidson, PE
Senior Civil Engineer

c: Eric Steger Craig Tackabery Rachel Warner

Letter D Responses – County Land Dev

D-1-a: Encroachment permits would be obtained from the County of Marin for any construction work performed within the Bon Air Road Right-of-Way (ROW).

The Draft EIR presents extensive detail about the proposed work that would occur within the Bon Air Road ROW. See *Construction Management Plan / Right of Way Activity* starting on Draft EIR page 3-52, and *Construction Logistics* starting on Draft EIR page 4.N-18. The information provided in the Draft EIR was developed in response to direction received from County of Marin staff during development of the Draft EIR. In fact, the level of detail provided for a project of this scale is notably greater than that typically available at the preliminary development phase and warranted during the environmental review under CEQA. While preliminary, the information presented in the Draft EIR is comprehensive and accurate.

The Draft EIR details the scope and timing of the detailed construction management plan that the project applicant will prepare that addresses all aspects of construction activity for each phase of construction, and includes a construction schedule, erosion and sediment control measures, and public right-of-way traffic control plans consistent with Marin County standards. The Utilities and Service Systems section of the Draft EIR presents, starting on page 4.N-19, a series of “ROW Utilities Work” figures (Figures 4.N-3 through 4.N-6) that show the relocation and/or installation of utility infrastructure involving public ROW. This information will be developed further in detail in the construction management plan to be submitted for the County’s Design Review process. There is no indication that construction plan details not yet provided may give rise to impacts not studied in the Draft EIR.

D-1-b: Please see response to Comment D-29-h regarding roadway degradation during construction. This is addressed also in the second full paragraph on Draft EIR page 4.M-31 in the Transportation and Circulation section of the Draft EIR.

D-1-c: See response to Comment D-13-f regarding the proposed removal of certain parking spaces on Bon Air Road.

D-1-d: Two existing street lights would be replaced, one each with the new traffic signal standards at the controlled intersections at the north and south access roads, as described under *Lighting Concept*, on Draft EIR page 3-51, and on page 4.N-24 under *Phase IVb* and accompanying Figure 4.N-6.

D-1-e: Transit operations and facilities during construction are introduced in the Draft EIR Chapter 3 (Project Description), under *Transit Access* on page 3-43, and specifically in the descriptions of Phases I and IV of construction (on Draft EIR pages 3-36 and 3-39, respectively). The proposed revisions by construction phase are depicted clearly in Draft

EIR Figure 3-17a for Phase I construction, and Figures 3-17e and 3-17f for Phases IVb and V-VI construction, respectively.

Overall, the project proposes three new bus stops (one relocated from on-site) along Bon Air Road, and there will be no significant disruption of transit service during construction phases of the proposed project, as stated on Draft EIR pages 4.M-37 to 4.M-38 in the Transportation and Circulation section. The Draft EIR specifies that the Marin Healthcare District would continue to coordinate with Marin Transit and Golden Gate Transit District to consider the appropriate and feasible locations for new and relocated facilities and potential adjustments to bus routes, as well as with the Marin County about ROW and safety considerations and requirements.

D-1-f: See responses to Comments D-1-a through D-1-e.

D-2: See responses to Comments D-13-f and H-19 regarding the proposed removal of certain existing parking spaces in the ROW. Existing parking spaces on Bon Air Road have never been included in calculations for proposed project parking supply for Marin General Hospital. However, existing parking spaces along Bon Air Road have been identified as part of the existing setting in terms of both on-site and off-site parking areas. Mitigation Measure TRA-2 was recommended that would remove the parking spaces to improve vehicle sight distance for new proposed project driveways on the Bon Air Road curve. The District understands that existing parking spaces along Bon Air Road are a limited resource and suggested mitigation may not be approved by the County.

D-3: See response to Comment D-1-a. The Draft EIR thoroughly addresses potential construction-period impacts of the proposed project, including, as specified by the commenter, those pertaining to safety, pedestrian and vehicular access, parking, emergency access, traffic control, increased traffic, and physical roadway deterioration. In all cases, the construction period impacts were determined to be less than significant.

Impact TRA-6, which starts on page 4.M-45 in the Draft EIR Transportation and Circulation section, addresses construction-related traffic and transportation impacts. The analysis of construction period traffic is presented on page 4.M-45, and the analysis of pedestrian and vehicular access during construction is presented on page 4.M-46.

As part of Impact TRA-7, the consideration of physical deterioration of area roadways as a result of project construction activity is discussed starting at the bottom of page 4.M-51 in the Draft EIR Transportation and Circulation section, and also determined to be less than significant.

The non-CEQA consideration of overall parking during construction is also addressed in detail starting on page 4.M-57. Also see response to Comment D-13-i regarding construction worker parking in particular.

As detailed starting on page 4.N-18 of the Draft EIR Utilities and Service Systems section, under *Construction Logistics*, the District has prepared specific preliminary construction logistics information that describes project specifics pertaining to the above-mentioned topics and supports the EIR analysis. Specific construction activities known to date are described starting on Draft 4.N-23, including descriptions of traffic control and access (e.g., K-rail placement, travel lane changes on-site in the ROW), changes to existing sidewalks and installation of temporary sidewalks, and changes to accessible pedestrian paths of travel (temporary sidewalks), for example.

Also, as stated throughout the Draft EIR (and initially discussed on page 3-52 of the Draft EIR Project Description chapter), the District will prepare and submit, for County review during the County's Design Review process, a detailed construction management plan that will be based on the more detailed construction information, and project and infrastructure design that the District will have developed by that time. In particular, coordination with County Public Works will occur to confirm specifics regarding emergency vehicle access routes and traffic control in detail. The County may require specific conditions for implementation of construction (e.g., traffic control, hours of hauling, etc.), but which would not result in additional potential impacts or be necessary to mitigate any significant environmental impacts already identified in the EIR to less than significant.

- D-4: The detailed construction management plan, prepared and submitted for County review during the County's Design Review process, will stipulate how transit service and pedestrian walkways will be maintained/managed during project construction. There are no unique conditions or evidence to suggest the project will not be able to provide safe, accessible travel paths.
- D-5: Draft EIR page 3-68 states the following under *County of Marin*: Although the project does not propose or anticipate any temporary public road closures, the approval of such, if warranted, must be granted by the Marin County Board of Supervisors.
- D-6-a: As stated under *Pedestrian and Bicycle Access* on Draft EIR page 3-44, pedestrian access improvements with the project include crosswalks at internal streets, and ADA accessible ramps; the project will comply with all applicable state and federal accessibility requirements. Each of the construction phase exhibits in Draft EIR Figures 3-17a through 3-17e (for Phases I through V-VI, starting on Draft EIR page 3-57) delineates the accessible path of travel for that phase.
- D-6-b: See response to Comment F-1.
- D-6-c: The project does not propose a new elevator or an elevated path of travel (POT) between the existing Mental Health Building and the Hillside Parking Structure. However, the project will comply with all applicable state and federal accessibility requirements associated with development and new buildings proposed under this project.

D-7: See responses to Comments D-1-a and D-3. The analysis of the effects associated with construction related work in the ROW (or otherwise), such as physical trenching, is addressed specifically in Draft EIR Section 4.B, *Air Quality* (Impacts AIR-2, AIR-3, AIR-5, AIR-8); Section 4.C, *Biological Resources* (Impacts BIO-1, BIO-3, BIO-6); Section 4.D, *Cultural and Paleontological Resources* (Impacts CUL-2 through CUL-5); Section 4.F, *Greenhouse Gases and Climate Change* (Impact GHG-1); Section 4.G, *Hazards and Hazardous Materials* (Impacts HAZ-2 and HAZ-3); Section 4.H, *Hydrology and Water Quality* (Impacts HYD-1 and HYD-2); Section 4.J, *Noise* (Impacts NOI-2 through NOI-4); and Section 4.N, *Utilities and Service Systems* (Impact UTIL-6).

D-8: See response to Comment D-29-h.

D-9: The following clarification is made to the second paragraph on Draft EIR page 3-13:

A ~~No~~ northern portion of the project site along Bon Air Road is located within an area classified as “other flood areas”, which includes chance of the 100-year flood, but with depths of less than one foot.

The following clarification is made to the bottom of Draft EIR page 4.H-3:

No portion of the project site is mapped in the 100-year flood zone – the “Special Flood Hazard Areas Subject to Inundation by the 1 Percent Annual Chance of Flood.” A northern portion of the project site along Bon Air Road is located within an area classified as “other flood areas”, which includes chance of the 100-year flood, but with depths of less than one foot.

D-10: The Draft Mitigation Monitoring and Reporting Program (MMRP) for the proposed project is included as **Appendix B** to this Final EIR. It has been developed in coordination with County of Marin staff and pursuant to Public Resources Code Section 21081.6, CEQA Guidelines Section 15097. To the extent that the text of mitigation measures are changed from the Draft EIR, those are shown in the revised Summary of Impacts and Mitigation Measures and Residual Impacts (Table 2-1R) in Chapter 3 (Changes to the Draft EIR) of this Final EIR. Also see response to Comment D-17-g regarding oversight and timing of implementation.

D-11-a: See revised Figures 3-2R, Figure 4.A-1R, Figure 4.J-1R, and Figure 4.H-1R, in Chapter 3 (Changes to the Draft EIR).

D-11-b: The first sentence of Draft EIR page 1-1, and the second paragraph of Draft EIR page 2-1, are modified as follows:

The Marin Healthcare District (“District”) has prepared this Environmental Impact Report (EIR) for the Marin General Hospital Replacement Building Project (“proposed project” or “project”), located in unincorporated Marin County, in the vicinity of ~~between~~ the communities of Kentfield and Greenbrae.

The first sentence of the first full paragraph on Draft EIR page 4.J-3 is modified as follows:

The proposed project would be located in ~~Greenbrae, California, an~~ unincorporated ~~community of~~ Marin County, in the vicinity of the communities of Kentfield and Greenbrae.

The second sentence of the second paragraph on Draft EIR page 4.I-1, and the last sentence on Draft EIR page 4.K-1, are modified as follows:

The project site is located in unincorporated Marin County, in the vicinity of ~~between~~ the unincorporated communities of Kentfield and Greenbrae...

The first sentence of the third paragraph on Draft EIR page 4.M-1 is modified as follows:

The project site is located at 250 Bon Air Road in unincorporated Marin County, in the vicinity of the communities of Kentfield and Greenbrae, California.

D-12: The first sentence in the fourth paragraph on Draft EIR page 2-2 is clarified as follows:

The project proposes to install two new traffic signals at the two main access/exit driveways to the project site off Bon Air Road; the northern signal installed upon operation of the Hillside Parking Structure (Phase I) ~~Hospital Replacement Building~~ and the southern driveway signal at a latter phase when warranted (either Phase V or VI).

D-13-a: The commenter is correct, as depicted in Draft EIR Figure 3-9; retaining walls would retain the hillside around the Hillside Parking Structure.

D-13-b: The Draft EIR specifies an Encroachment Permit for Phase I on page 3-36.

D-13-c: Proposed strategies to reduce single rider vehicle traffic during peak hours are specified for the project in Mitigation Measure GHG-2 (on Draft EIR page 4.F-15, as revised in the Comment D-23 response), which the project will be required to implement (in addition to continuation/expansion of existing strategies) to mitigate the significant GHG emissions estimated for the project. Thus, these measures are not also considered part of the project and described in Chapter 3 (Project Description).

The list under *Sustainability Elements* that starts on Draft EIR page 3-42 is supplemented with the following that was previously omitted:

- **Transportation Demand Management (TDM):** The project currently operates valet parking services, provides shuttle transit services, maintains five carpool spaces onsite, and offers a benefit program through which employees

receive pre-tax transit expense reimbursements.² The hospital also currently coordinates with 511 Rideshare, a San Francisco Bay Area organization that provides assistance to employers relative to travel demand management.

Related revisions are made to Draft EIR page 4.F-12, following the bulleted list:

Transportation Demand Management (TDM). The existing Marin General Hospital TDM strategies include valet parking, ~~and~~ the provision of shuttle transit services, five carpool spaces onsite, and a benefit program through which employees receive pre-tax transit expense reimbursements. Furthermore, the hospital coordinates with *511 Rideshare*, a San Francisco Bay Area organization that provides assistance to employers relative to travel demand management. Adjustments for TDM strategies were not incorporated into the emissions modeling for the existing and no project scenarios.

More related revisions are made to the next to last sentence in the second paragraph on Draft EIR page 4.B-13; to the first sentence of the last paragraph on Draft EIR page 4.M-28; the first full sentence to Draft EIR page 4.M-34; and to the last full paragraph on Draft EIR page 4.M-38:

As described more-fully below (see Impact TRA-4), the existing Marin General Hospital Travel Demand Management (TDM) program includes the use of valet services, ~~and~~ shuttle transit service, onsite carpool parking spaces, and pre-tax transit expense reimbursements for employees.

D-13-d: The information raised by the commenter is provided starting at the last paragraph on Draft EIR page 4.M-34. Section 3.6.1 cited in the comment is in the Draft EIR Project Description chapter, which introduces numerous characteristics of the proposed project that are described in greater detail in the analysis sections throughout the document, as is typical in EIRs for large major projects such as this one. Specifically, the proposed emergency access into the project site for ambulances is described and discussed in greater detail in the Draft EIR Transportation and Circulation section. Starting on the last paragraph on page 4.M-34, the Draft EIR states that “A new median break (with a turn pocket about 60 feet in length) would be installed on Bon Air Road as part of this driveway improvement to allow southbound ambulances to turn left (eastbound) into the campus. The final design for this modification to the median would be coordinated with emergency responders and the Marin County Parks and Open Space Department.” Moreover, there would be no substantial delay for these emergency vehicles given the nature of their use; they would have ultimate right-of-way over Bon Air Road traffic during emergency periods.

² Funds are deducted from employee salary, pre-tax. Those funds are then reimbursed to the employee, immediately but separate and untaxed.

D-13-e: The third paragraph on Draft EIR page 4.M-36 explains that pedestrian crosswalks would be installed across each leg of both of the project's main north and south driveway entrances at Bon Air Road (with signalization). These crosswalks would provide pedestrian links across Bon Air Road that would allow access to adjacent pedestrian and bicycle facilities on the west side of the road. Similar to control at other unsignalized crosswalks on Bon Air Road, "PED XING" pavement markings would be installed on Bon Air Road upstream of the crosswalks of the project's south driveway. This would be the condition in place prior to activation of traffic signals at the north driveway in Phase II and the south driveway in either Phase V or VI.

D-13-f: The existing on-street parking and changes due to the proposed project (e.g., new driveways) are described in the Draft EIR Transportation and Circulation section (pages 4.M-16, 4.M-35, and 4.M-57). As stated on those pages, Bon Air Road currently has 73 striped parking spaces total on both sides of the street. This includes 31 two-hour (restricted) parking spaces along the west side of the street and 42 unrestricted (no time limit) spaces along the east side of the street (project site frontage). Based on the proposed project site plan, new driveway cuts would be required along the east side of Bon Air Road to account for the emergency ambulance entrance driveway and the outbound right-turn-only driveway from the proposed parking garage. This would result in the loss of five unrestricted parking spaces on the east side of Bon Air Road (two spaces for the ambulance entrance, one space for the outbound garage driveway, and two spaces between the two driveways for sight distance considerations). However, one or two parking spaces would be gained along the east side of Bon Air Road from the closure of the outbound only (right-turn-only) driveway located mid-block, for a net loss of three spaces. Field observations indicate that a majority of these unrestricted parking spaces on the east side of Bon Air Road are occupied before or at 7:00 a.m. during the weekdays. As stated on page 4.M-57 (as revised in this Final EIR), the project would reduce the existing on-site parking deficit of 128 spaces to 26 spaces in 2018, and to 104 spaces in 2035. Thus, the project would represent a net improvement over current conditions, with fewer employees and visitors using off-site parking spaces in the neighborhood. In addition, the estimates of future demand do not take into consideration TDM measures (e.g., carpooling) that are expected to reduce single-occupancy vehicle trips and lower the parking deficit.

Although not required because of the proposed project, given the County's stated importance of these on-street spaces, the County may wish to consider a two-hour parking limit as is currently enforced on the west side of Bon Air Road. This measure would help parking space turnover and allow more opportunities for local residents to use parking for adjacent Creekside Park and health club uses.

D-13-g: New Figure 3-18, Preliminary Stormwater Control Plan is provided in Chapter 3 (Changes to the Draft EIR) in this Final EIR.

D-13-h: The second sentence of the first paragraph on Draft EIR page 3-52 is modified as follows:

Overall, initial construction activities for the first phase would start in ~~2013~~²⁰¹⁴, and all major construction associated with the project would be completed by 2020.

D-13-i: Off-site contractor parking is described in the Draft EIR Transportation and Circulation section (pages 4.M-57 and 4.M-58). As stated on those pages, construction of the Hillside Parking Structure in Phase I would remove 12 existing parking spaces from the supply, but the departure of the Marin Community Clinic would remove a parking demand of 35 spaces from the project site. The Hillside Parking Structure would add 401 spaces within one year (2013-2014), prior to the start of Phase II construction activities. During all phases of construction, the contractor would utilize a 26-space parking lot on the hillside for construction parking, accommodating construction parking needs for Phase I activities. For the additional phases (Phases II, III, and IV), additional parking would be provided through the continuation of the existing lease of the off-site parking lot at the St. Sebastian's Church, and the use of shuttle service for workers. The parking supply provided on the hillside lot and St. Sebastian's Church would accommodate parking demand for Phases II, III and IV of construction.

The use of those parking facilities by construction workers would be stipulated in the contractors' construction specifications.

D-13-j: The statement in the Draft EIR is accurate and specifies that with regard to existing ROW utilities in Bon Air Road, the sanitary sewer line is the only new additional utility to the ROW.

D-13-k: The following revisions are made under *County of Marin* at the top of Draft EIR page 3-68:

The County would make decisions on the following discretionary actions (and other considerations and approvals) that have been identified at the time this EIR was prepared:

- Approval of Property Swap or Lease Agreement for construction of the Hillside Parking Structure (County Administrator);
- Design Review (pursuant to Development Code section 22.14.040, Special Purpose District Development Standards) (County Community Development Agency);
- Any work in the Bon Air Road Right of Way (County Public Works); ~~and~~
- Grading Permit for earthwork associated with the project;
- Building Permit for Parking Structures and Ambulatory Services Building (County Building Department); and
- Elimination of parking spaces on Bon Air Road.

D-14: Table 4-1 on page 4-5 of the Draft EIR Environmental Setting, Impacts and Mitigation Measures chapter lists the cumulative projects, plans and programs considered in the cumulative analysis for the proposed project (which also considered growth reflected in the Transportation Authority of Marin [TAM] travel demand model projections, which reflects traffic from projects countywide and that were applied to develop 2018 and 2035 traffic growth projections for project study roadways). The County was consulted for, and reviewed and commented on, an administrative draft of the list. Through that internal review, the County provided to the District on April 13, 2012, the “Marin County PropDev46” list (to replace the “Marin County PropDev45” list that was part of the administrative draft list submitted for County review). The County also identified one additional “reasonably foreseeable future” project (Bay Club Expansion, 235 Bon Air Road) that was “under review” by the County at that time and thus should be considered in the cumulative analysis. The County did not identify the Marin Catholic High School Stadium Project (school) as a cumulative project during its comprehensive administrative review of the cumulative development list or the Draft EIR. Moreover, the school received the Notice of Preparation (NOP) of the Draft EIR; the District did not receive any comments from or on behalf of the school in response to the NOP or regarding the pending stadium project (see Appendix A, *NOP and EIR Scoping Comments*, to the Draft EIR).

During preparation of this response during preparation of the Final EIR, the County confirmed that the stadium project involves the construction of a new approximately 1,200-seat steel and aluminum bleacher system to replace the existing approximately 1,500-seat bleacher system; construct an approximately 7,000 square-foot field house (with concession stand, rest rooms, locker rooms, training and weight rooms, and storage and utility rooms); access improvements that involve increasing stadium parking from 270 spaces to 280 spaces, ramps and walkway improvements; and a new speaker system. No new stadium lighting facilities are proposed. Considering the proposed operation/use, physical characteristics, and extent of construction activity and duration associated with the stadium project, it is not anticipated to generate environmental effects that would contribute to adverse cumulative environmental conditions to which the proposed MGH Project would have a “cumulatively considerable contribution,” and thus a significant impact under CEQA. The stadium will continue to be used periodically and seasonally for student sporting events and practices. While a new field house will include ancillary facilities (e.g., concession stand, locker rooms, training and weight rooms), these uses would not be large, or result in notably increased peak-hours (or daily) vehicle trips to the stadium/school site (and resulting increased traffic, air and greenhouse gas emissions, and noise effects), as these uses would serve existing student population already on or coming to the campus.

It is possible that the construction period for the stadium project could overlap with that for the MGH Project (pending County approvals for each). However, the construction activity to dismantle the existing bleacher system, assemble and stabilize the new system, and construct an approximately 7,000 square foot field house and parking improvements

would not involve heavy diesel-generating equipment, or be expected or likely to occur for an extended duration or in close proximity to sensitive resources (residents and the MGH). Therefore, it is not reasonable to expect that the effects from the stadium project construction would combine with the other cumulative development to create significant temporary cumulative effects during construction (especially for the aforementioned topics). Notwithstanding, as stated on page 4.M-24 in the Draft EIR Transportation and Circulation section, regarding the nearby Bon Air Bridge construction that also could overlap with the construction period of the MGH Project, any conflicts between the proposed project and any other nearby projects would be addressed as part of the proposed project's construction management plan (see responses to Comments D-1-a and D-3).

D-15-a: See responses to Comments D-10 and D-17-g. The MMRP will be used to ensure implementation, monitoring and reporting of all mitigation measures identified for the project, during construction and operations.

D-15-b: The Draft EIR is accurate. No quantity of earth transport is stated for Phase III because none is assumed. The earthwork during Phase III would be contained onsite; there would be no hauling of soil off site. The detailed URBEMIS model analysis sheets for each phase of construction are provided in Appendix C to the Draft EIR. As shown in the calculation sheets for Phase III (page 4), the *Phase Assumptions* for the analysis include "Not much to demolish except asphalt," and the mass grading assumption is "1 month excavation site grading description no soil hauling."

D-15-c: The URBEMIS model refers to construction-related delivery truck trips as "vender trips." Construction vender trips are calculated for the building construction phase based on the URBEMIS model default trip generation rates per 1,000 square feet of land use type, which are applied to the land use areas defined for the project. For discussion of operation-related delivery truck trips that would be associated with the project, refer to Draft EIR page 4.B-27.

D-15-d: See response to Comment D-13-c. The hospital also currently coordinates with *511 Rideshare*, a San Francisco Bay Area organization that provides assistance to employers relative to travel demand management. See response to Comment D-17-g regarding ongoing implementation and tracking of the required TDM strategies.

D-15-e: The Bay Club is a health and fitness club, which for the purposes of defining cancer risk, is not a sensitive receptor where extended exposures could occur. Examples of sensitive receptors where extended exposure could occur are facilities or land uses such as schools, hospitals, and residential areas that include members of the population that are particularly sensitive to the effects of air pollutants (e.g., children, the elderly, and people with illnesses).

D-15-f: See response to Comment D-10.

D-16-a: The geotechnical studies and investigation reports prepared by Fugro West, Inc., for the proposed project are available for review at the Marin Healthcare District offices, upon request, as stated at the bottom of Draft EIR page 1-5. These documents are references cited in the Draft EIR. The volume of the Fugro West, Inc. reports makes it impractical to provide those documents in the Final EIR.

D-16-b: The following correction is made to Draft EIR page 4.E-23:

Site constraints include sloped hillside on three sides of the structure which would require retaining walls of up to 25 ~~at least 30~~ feet in height with excavations up to 20 feet.

D-17-a: Existing operations at the hospital are considered part of the environmental setting associated with the project. Per CEQA Guidelines Section 15125(a), the environmental setting normally constitutes the baseline physical conditions by which a lead agency determines whether an impact is significant. Therefore, it would not be appropriate to add the GHG emissions associated with existing operations at the hospital to the estimated project construction and/or operation emissions for comparison to the significance criterion. Such a comparison would overstate the project-related impact.

D-17-b: Existing hospital-related traffic is considered to be part of the environmental setting associated with the project. Adding the existing traffic-related emissions to construction emissions and the phased operational emissions would overstate the project-related impact (also see response to Comment D-17-a).

D-17-c: Providing valet service on the project site offers parking service to outpatients and visitors who drive to the currently parking-constrained project site, which reduces cars circulating the project site and local streets for parking.

D-17-d: See the revision to Mitigation Measure GHG-2 in the Comment D-23 response. Also see response to Comments E-3.

D-17-e: See response to Comment D-10. Mitigation Measure GHG-2 on Draft EIR 4.F-15 (as revised in response to the Comment D-23 response) includes designation of an employee transportation coordinator (ETC) to facilitate the program. The ETC would also be responsible for monitoring and reporting, and recommending adjustment as needed to ensure program effectiveness.

D-17-f: See the revision to the Emergency Ride Home strategy in Mitigation Measure GHG-2, as revised in the Comment D-23 response and in response to Comment E-3.

D-17-g: The effectiveness of the TDM strategies in Mitigation Measure GHG-2, once implemented pursuant to the timeframes specified therein, relies squarely on achieving at least a seven percent reduction in vehicle trips through the combined suite of strategies aimed at promoting and providing to employees alternative travel modes to driving alone

to and from work (see discussion of *TDM Program Measures Effectiveness* starting on Draft EIR page 4.F-16). As specified in Mitigation Measure GHG-2 (and elaborated on in the Draft MMRP in **Appendix B** to this Final EIR), the project applicant will adhere to a systematic reporting plan involving the County and other agencies or organizations to ensure implementation and progress toward the effectiveness goals over time.

Draft EIR page 4.G-17 fully states, *The effectiveness of the strategies identified in Mitigation Measure GHG-2 is heightened by the fact that these strategies respond directly to the incentives and alternative modes that employees identified as workable and key to their decision to shift modes.* This statement refers to the fact the TDM strategies in GHG-2 stem directly from employees' input, demographics, constraints, and personal choice factors, and what would be necessary to allow and motivate them to make a mode shift choice. Existing participation in MGH's current carpool/vanpool program instituted in April 2012 is minimal, and the TDM strategies target the areas for likely success. Therefore it is reasonable to presume greater effectiveness than if strategies had been prescribed for the hospital employees without these insights gained directly from employees.

D-17-h: The Draft EIR recognizes the relationship of the project's traffic to its GHG emissions; reference to, and consideration of, the TDM strategies identified in Mitigation Measure GHG-2 (as revised in the Comment D-23 response) is presented in the discussion of traffic impacts Impact TRA-1 (on Draft EIR 4.M-28, 4.M-32 and 4.M-34); Impact TRA-4 (on Draft EIR page 4.M-39); and Impact TRA-7 (on Draft EIR page 4.M-52 and 4.M-53).

D-18-a: Consistent with standard practice, the impact analyses throughout the EIR generally presume the project's adherence to, and compliance with, existing applicable federal, state and regional laws, standards, and regulations. For hydrology and water quality, this comprehensive set of mechanisms are described in detail in the *Regulatory Setting* starting on Draft EIR page 4.H-9, and discussed further as they apply to, and would be implemented by, the proposed project within the impacts analysis starting on Draft EIR page 4.H-16. The existing regulatory system and mechanisms, considered with the project's specific characteristic, effectively reduce the risk of significant impact of construction and operation of the project on surface water quality to less than significant, by virtue of these well-established, accepted methods that have been uniformly applied and adapted for years being assumed with the project and thereby offsetting the potential for significant project and cumulative impacts.

For example, the discussion of Impact HYD-1 starting on Draft EIR page 4.H-16 describes the specific characteristics of a Stormwater Pollution Prevention Plan (SWPPP) and Low Impact Development (LID) approaches required to minimize the potential for sediment and/or contaminants to drain to the Bay during construction. Proven techniques and designs commonly referred to as Best Management Practices (BMPs) are expected to achieve the required results as described in the Draft EIR, even though the exact

formulation of the SWPPP and selection of BMPs necessarily occurs during a more advanced project design period. No mitigation is needed.

D-18-b: See response to Comment D-18-a.

D-18-c: New Figure 3-18, Preliminary Stormwater Control Plan is provided in Chapter 3 (Changes to the Draft EIR) in this Final EIR. Also see response to Comment D-13-g.

D-18-d: Draft EIR Figure 4.N-2, Proposed Utility Lines, on Draft EIR page 4.N-4 is modified to remove proposed bioswales in the Bon Air Road median, as shown in Chapter 3 (Changes to the Draft EIR) in this Final EIR as Figure 4.N-2R.

D-18-e: See response to Comment D-18-a.

D-18-f: See response to Comment D-18-d. No revisions to Draft EIR page 4.H-21 are warranted per this comment. See response to Comments D-18-r and D-18-s.

D-18-g: The last sentence of the third full paragraph on Draft EIR page 4.H-13 is revised as follows:

Countywide MCSTOPPP is not the lead for projects where permits are issued in unincorporated Marin.

D-18-h: The first sentence under *Operation* on Draft EIR page 4.H-18 is revised as follows:

The project is replacing 239,124 square feet of impervious surface and creating 9,900~~249,024~~ square feet of impervious surface, which is equivalent to approximately 47 percent of the existing impervious surface on the project site.

D-18-i: The first three sentences of the second paragraph under *Operation* on Draft EIR page 4.H-18 are revised as follows:

The County ~~MCSTOPPP~~ (within the framework of the Phase II NPDES General Permit) specifically addresses potential stormwater impacts of, among other things, development and redevelopment projects. Potential water quality impacts addressed by the County ~~MCSTOPPP~~ include both construction-related impacts (i.e., short-term impacts) and the equivalent of operational impacts (i.e., long-term, chronic processes and impacts). The potential impacts of the project due to increased stormwater runoff that could convey pollutants to the storm drain system and Corte Madera Creek and that could cause erosion and sedimentation during operation would be adequately addressed by the measures and actions required by the Phase II NPDES permit ~~MCSTOPPP~~. ~~For example, the Phase II NPDES permit specifies a number of requirements for inclusion in a storm water management plan (i.e., in the MCSTOPPP Action Plan 2010), including monitoring and biological assessments. Further, the MCSTOPPP was required to set out a list of Action Plan 2010 describes Best Management Practices (BMPs) as well as measurable goals for the development~~

~~and implementation of each BMP. The performance standards contained within the MCSTOPPP Action Plan 2010 serve as measurable goals and define compliance per the Phase II General Permit requirements.~~

The remaining text revisions proposed by the commenter help to specify for the reader the potential causes and effects of potential impacts and therefore not implemented.

D-18-j: The last paragraph on Draft EIR page 4.H-18 is revised as follows, per the County's request:

~~In addition~~ Specifically, the County of Marin requires projects subject to Attachment 4 requirements of the Phase II NPDES permit to follow MCSTOPPP's Guidance for Applicants: Stormwater Quality Requirements for Development Projects in Marin County. The Guidance for Applicants describes the required Low Impact Development (LID) approach to compliance with Attachment 4. ~~Potential erosion and sedimentation impacts of the project would be addressed through the Low Impact Design (LID) measures required by the MCSTOPPP.~~ The following Low Impact Design (LID) stormwater treatment measures are proposed as part of the project: flow-through planter boxes, biofiltration swales and infiltration basins, pervious (porous) pavement (e.g., for parking areas). Additionally, potential impacts resulting from hazardous materials contamination during operations would be made less than significant through compliance with stringent regulations for the use and storage of these chemicals and is discussed in greater detail in Section 4.G, *Hazards and Hazardous Materials*. The existing water quality protection measures required of the applicant (e.g., Phase II Permit Attachment 4 compliance) would be sufficient to address potential operation-related (i.e., long-term) water quality impacts that may result from project implementation. No potential operation-related water quality impacts would necessitate implementing measures beyond those already required by the County and Phase II Permit Attachment 4. Therefore, the potential operation-related water quality impacts would be less than significant.

D-18-k: See response to Comment D-18-j.

D-18-l: See response to Comment D-18-j.

D-18-m: See response to Comment D-18-j.

D-18-n: See response to Comment D-18-j.

D-18-o: See response to Comment D-18-j.

D-18-p: See response to Comment D-18-j.

D-18-q: See response to Comment D-18-r.

D-18-r: The following revisions are made starting at the last paragraph on Draft EIR page 4.H-20:

The project would replace ~~and create 249,024~~ 239,124 square feet of impervious surface ~~and would create~~. ~~However, this would only result in a total increase of~~ 9,900 square feet of impervious surface. This increase in impervious surface area represents approximately two percent of the project total existing impervious project site area. However, a site-specific Storm Drainage Report concluded that peak site runoff volumes would decrease from 266,340 cubic feet per second (cfs) to 265,832 cfs, as a result of implementation of LID design strategies as required by the Marin County NPDES permit and Phase II Permit Attachment 4 (discussed in Impact HYD-1) MCSTOPPP (KFPP, 2011). Peak runoff rates (for a 100-year storm event) would decrease from 53.80 cfs to 48.77 cfs. As discussed in the *Regulatory Setting* above, the MCSTOPPP County requires that the project incorporate LID design or implement strategies for projects on previously developed sites when “5,000 square feet or more of impervious area is created or replaced.” If the impervious area being created or replaced is less than 50 percent of the existing total site area, “the requirements apply only to the addition.” The Marin Healthcare District campus has an existing 530,678 square feet of site area. Of that, the project is proposing to replace 239,124 square feet of impervious area and create 9,900 square feet of new impervious area and is creating and/or replacing a total of 249,024 square feet of impervious surface. Since the project is creating and/or replacing only 47 percent of the existing impervious surface site area, stormwater treatment is provided for only the new and/or replaced impervious surface on the site. In addition to reducing the discharge of stormwater pollutants to the maximum extent practicable, LID design aims to mimic the post-project site hydrology to the pre-project site hydrology. The MCSTOPPP County requires developments to infiltrate runoff or provide facilities to treat stormwater runoff prior to its release from the site in addition to controlling the peak runoff rate and flow volume.

D-18-s: See response to Comment D-18-r.

D-19: Given the content of the comment, it is assumed that the commenter meant to say Impact TRA-1 (Existing Plus Project traffic LOS), not Impact TRA-2 (Traffic Safety), and to include TRA-7 (2035 traffic LOS) in addition to TRA-5 (2018 traffic LOS). The Draft EIR’s Transportation and Circulation section identifies vehicle delay (in seconds) and associated LOS for the Wolfe Grade, La Cuesta Drive, and Eliseo Drive intersections at Sir Francis Drake Boulevard for all with and without proposed project scenarios. This includes existing, existing plus project, Year 2018 Short-Term (no project), Year 2018 Short-Term plus Project, Year 2035 Cumulative (no project), and Year 2035 Cumulative plus Project conditions. Tables 4.M-2, 4.M-3, 4.M-7, 4.M-8, 4.M-10, 4.M-11, 4.M-13, and 4.M-14 specifically list intersection LOS and vehicle delays for specific intersections.

D-20: Given the content of the comment, it is assumed that the commenter meant to say Impact TRA-1 (Existing Plus Project traffic LOS), not Impact TRA-2 (Traffic Safety), and to include TRA-5 (2018 traffic LOS) and TRA-7 (2035 traffic LOS). All mitigation

measures have been investigated for their feasibility with respect to improvements along Sir Francis Drake Boulevard including potential widening and/or lane additions that have been determined by the County not to be feasible because of excessive cost and disruption given existing constraints (e.g., residential and commercial buildings in the area needed for an additional travel lane) and/or lack of ROW. Based on June 2012 discussions with County of Marin Public Works Transportation staff (Mr. Robert Goralka, Traffic Engineer), transportation improvements are being considered along Sir Francis Drake Boulevard as part of the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement project. The widening of Sir Francis Drake Boulevard to provide a new eastbound through lane (dependent on future engineering studies if feasible) would start west of Eliseo Drive (at the Bon Air Shopping Center Driveway), and extend east through Eliseo Drive to the Highway 101 southbound on-ramp. The Draft EIR describes this potential widening on page 4.M-24 (under Future Transportation Improvements). (See Highway 101 Greenbrae/Twin Cities Corridor Improvement project plans with response to Comment A-6.) The preliminary design requires additional engineering studies and may not be feasible due to existing development and ROW constraints.

However, should the circulation improvement be deemed appropriate for cumulative year 2035 (no project) conditions, it would likely improve traffic flow and vehicle delay at the Eliseo Drive / Sir Francis Drake Boulevard intersection. As stated on Draft EIR page 4.M-51, should the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement project circulation improvement for Sir Francis Drake Boulevard (eastbound through lane at Eliseo Drive) be deemed feasible, the proposed project would contribute a “fair share” contribution towards that improvement, based on the percentage of project’s p.m. peak-hour vehicle trips of the total cumulative year 2035 plus project volume at this intersection. (See response to Comment A-6 regarding fair share contribution amounts.)

The project applicant has investigated eight sites for the potential for park-and-ride lots and/or shuttle bus for employees/patrons of the hospital. Other than the existing off-site secured parking area and shuttle service to/from St. Sebastian’s Church, the applicant explored eight other parking areas off-site: near Larkspur Landing Circle; near Industrial Way east of Highway 101; two near Francisco Boulevard East, north of the Richmond-San Rafael Bridge touchdown; near the Home Depot site east of I-580; along Doherty Drive; and southwest of Magnolia Avenue and Bon Air Road. These other parking areas that were investigated would require infrastructure cost and lease costs, and are far enough away from the hospital to incur “lost employee production” (i.e., extra travel time of about one hour per day).

To the extent that some MGH employees are using the Marin Ferry System located east of Highway 101 off Sir Francis Drake Boulevard, Golden Gate Transit is already providing service to/from the hospital campus.

The project applicant would contribute a proportional share towards the upgrade of A70 traffic signal controllers along Sir Francis Drake Boulevard at the affected intersections at the Wolfe Grade, La Cuesta, and Eliseo Drive intersections based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections.

This requirement is added to Mitigation Measure TRA-7 on page 4.M-52 of the Draft EIR as follows (revisions shown below also address response to Comment D-25):

Mitigation Measure TRA-7: If the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement project circulation improvement for Sir Francis Drake Boulevard (eastbound through lane at Eliseo Drive) is deemed feasible, the project applicant shall contribute a proportional “fair share” contribution towards that improvement, based on the project’s percent contribution to the total cumulative year 2035 plus project volume at the intersection.

The project applicant shall contribute a proportional “fair share” towards the upgrade of A70 traffic signal controllers along Sir Francis Drake Boulevard at the affected intersections at the Wolfe Grade, La Cuesta, and Eliseo Drive intersections based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections.

The project applicant shall contribute a proportional “fair share” towards an engineering study to evaluate the potential for increasing the westbound left-turn lane storage based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections the Bon Air Road/Sir Francis Drake Boulevard intersection.

There are no additional feasible measures to mitigate the project impact at the other identified intersections to a less-than-significant level.

Significance after Consideration of Mitigation Measure: Significant and Unavoidable

- D-21: Comment acknowledged. All identified traffic safety impacts under TRA-2 would be implemented under Phase 1; if Phase 1 were to be delayed past 2018, then 2018 would not be an appropriate trigger point for implementation of TRA-2. This would include northbound Bon Air Road lane configurations at the proposed project’s main north driveway, red zones along Bon Air Road (for sight distance), and its effect on existing street parking. See response to Comment D-13-f.
- D-22: See responses to Comments A-6 and D-20 regarding the project’s contribution, if appropriate, towards improvements noted in the Highway 101 Greenbrae Twin Cities Corridor Improvement Project, and regarding contribution to upgrades to traffic signal controllers. The Transportation Authority of Marin (TAM) has reviewed the Draft EIR (Dianne Steinhauer, Executive Director, TAM, October 22, 2012); see responses to Comment Letter E.

D-23: Extensive TDM measures have been evaluated as part the Draft EIR transportation analysis in partnership with 511.Org (please refer to Draft EIR pages 4.M-38 and 4.M-39 of the Draft EIR). The District has further considered since preparation of the Draft EIR additional measures, including those received with comments on the Draft EIR (particularly this comment D-23, comment H-22, H-32, and Comment E-3). As a result, new and expanded TDM strategies for the project are incorporated in Mitigation Measure GHG-2, the TDM strategies portion of which is revised below to replace that shown on Draft EIR page 4.F-15:

Mitigation Measure GHG-2: The Project shall include the following features to reduce energy consumption that could reduce the GHG emissions associated with the proposed project.

- *Additional Transportation Demand Management Strategies.* The project applicant shall implement the following Transportation Demand Management (TDM) program strategies, in addition to maintaining the existing Marin General Hospital valet parking, ~~and~~ shuttle transit service, onsite carpool parking spaces, and pre-tax transit expense reimbursements for employees ~~TDM strategies:~~
 - a) Employee Commute Program. Develop and implement a Marin General Hospital employee commute program with specific actions and goals to provide on-site information to employees about commute alternatives to and from Marin General Hospital. Specific actions shall include the administration of an annual commute behavior survey, implementation of a mandated expanded commuter benefit programs, and periodic incentives to promote and encourage commute alternatives to driving alone. ~~Designate an employee transportation coordinator (ETC) to facilitate the program;~~
 - b) Carpool and Vanpool Matching. Provide easy access to carpool and vanpool matching for Marin General Hospital employees, working together with the Metropolitan Transportation Commission (MTC), 511 Rideshare, Transportation Authority of Marin (TAM), or other agency or organization with this objective. Provide a rideshare matching information bulletin board, website our other effective means of facilitating coordination among potential employees interested in ridesharing;
 - c) Bicycle Facilities. ~~Provide~~ Incorporate employee access to showers and changing facilities and provide additional secured bicycle parking facilities to encourage bicycle use by Marin General Hospital employees;
 - d) Emergency Ride Home. Participate in the countywide Emergency Ride Home (ERH) program administered by TAM for employees who use commute alternatives to driving alone ~~for Marin County employers when it is made available by the County;~~
 - e) Expanded Preferential Parking Program. Designate an increased ratio of on-site parking for carpool vehicles (exclusive of elderly and handicapped parking). (The current ratio is approximately one per 120

total on-site spaces – five of 605 spaces.) Clearly indicate the location of the preferential parking spaces using appropriate signage.

- f) Vanpool Program Support. Support and promote the development of employee vanpools countywide, in cooperation with MTC, 511 Rideshare, TAM, and other agencies offering incentive programs, as appropriate.

~~Implementation Timeframes. Within one calendar year after patient occupancy of the Hospital Replacement Building, the project applicant shall initially submit to the County Department of Public Works (or other department or agencywise as designated by the County) documentation sufficient to demonstrate implementation and effectiveness of each of the aforementioned strategies within the timeframes below. Also, each of the strategies, except as specified below, shall also be extended to include employees of the Ambulatory Services Building when that building is operational.~~

At completion of the Hillside Parking Structure (End of Phase I), and annually thereafter: TDM strategies “a” (Employee Commute Program), except the administration of an annual commute behavior survey; “b” (Carpool and Vanpool Matching); “d” (Emergency Ride Home); and “f” (Vanpool Program Support). Except for the administration of an annual commute behavior survey with TDM strategy “a”, each of these strategies are administrative and viable for implementation during construction.

One calendar year after completion of the Hillside Parking Structure (Phase I + 1 Year): Part of TDM strategy “a” (Employee Commute Program) to administer an annual commute behavior survey. This duration allows time for the Employee Commute Program to be established and used before surveying.

Upon completion of the Ambulatory Services Building (End of Phase III): Part of TDM strategy “c” (Bicycle Facilities) to provide additional secured bicycle parking facilities; and TDM strategy “e” (Expanded Preferential Parking Program).

Upon patient occupancy of the Hospital Replacement Building (End of Phase IV): Part of TDM strategy “c” (Bicycle Facilities) to provide employee access to showers and changing facilities for expanded bicycle facilities. This TDM strategy involves establishing facilities in the hospital and therefore would not be available until after the Hospital Replacement Building is operational.

Specific strategies recommended by the commenter, but that are not explicitly included in Mitigation Measure GHG-2 for the project, include the commenter’s recommendations (#1) flexible work schedules for employees and contractors, which has limited practicality given the multiple workshifts, employee preferences, and other unique operational characteristics of a hospital and its staffing needs; (#2) a reward or incentive program which will reward employees who commute a certain number of work days a week/month by modes other than the single occupant auto, although this could be included as one of the “periodic incentives” specified in strategy “a” of Mitigation Measure GHG-2; (#3) cash incentives or

credit towards time off or other similar incentives may be used in lieu of a cash award, which also could be included as one of the “periodic incentives” specified in strategy “a” of Mitigation Measure GHG-2; and (#7) coordination of the development and implementation of the Transportation Management Plan with adjacent businesses and uses to improve the overall effectiveness of the programs. These additional strategies are not required to reduce the project’s significant GHG emissions to less than significant levels, however the District will consider the feasibility of these additional recommendations to be implemented at Marin General Hospital as the District reviews this EIR and prior to taking action to approve or not approve the project.

- D-24: The Draft EIR assessed impacts during project construction activities (Impact TRA-6) in a manner consistent with the standard planning level of detail for these temporary effects. As described on pages 4.M-45 and 4.M-46 of the Draft EIR, the project would generate a moderate (and temporary) increase in traffic during project construction, and the impact on intersection level of service would be less than significant.

In coordination with Marin County staff, the following is inserted after the first full paragraph on Draft EIR page 4.M-46, as part of Impact TRA-6:

Although the project’s impact on intersection operations during construction would be less than significant and therefore not warrant mitigation, the County of Marin Department of Public Works recommends that the project applicant develop project measures to reduce employee and construction worker traffic at peak drop-off (generally 7:30-8:15 a.m.) and pick-up (generally 3:00-3:30 p.m.) periods at Marin Catholic High School. In response, the District will employ the following:

Recommendation: To substantially reduce vehicle trips associated with construction workers for the proposed project that would conflict with peak high school traffic, the project applicant shall limit that (1) construction work shifts start no later than 7:00 a.m., excepting work shifts involving “noise generating activities,” which are restricted by Mitigation Measure NOI-2 (consistent with the Marin County Municipal Code) from starting before 8:00 a.m.; and (2) construction work shifts end before 2:30 p.m. or after 3:30 p.m. Also, at the start of each stage of construction activity, the construction manager shall encourage all construction contractors, especially those involving large trucks, to avoid the peak morning drop-off period (generally 7:30-8:15 a.m.) and evening pick-up period (generally 3:00-3:30 p.m.), as feasible and practical.

The Draft EIR also examined the potential effect of heavy trucks on road pavement wear and tear, and determined that the project’s impact would be minimal on arterials (e.g., Sir Francis Drake Boulevard and Bon Air Road) and other designated truck routes that are designed to accommodate a mix of vehicle types, including heavy trucks. As discussed in response to Comment D-1 and in other sections of the Draft EIR (see *Construction Management Plan / Right of Way Activity* in Project Description, Chapter 3; and *Construction Logistics* in Section 4.N, *Utilities and Service Systems*), the project applicant will prepare a detailed construction management plan that describes site

- logistics for each phase of construction, and that addresses all construction-related effects related to truck traffic. The detailed construction management plan will be prepared for submittal, review and approval during the County's Design Review process.
- D-25: As described on pages 4.M-33 and 4.M-34 of the Draft EIR Transportation and Circulation section, due to physical constraints of adjacent residential and/or commercial property along Sir Francis Drake Boulevard, road widening to achieve the lengthening of the dual westbound left-turn lanes on Sir Francis Drake Boulevard at Bon Air Road would require the acquisition of additional ROW. The Draft EIR has identified the proposed project's impact to vehicle queuing as significant and unavoidable. The Draft EIR analysis does not conduct specific engineering analyses to perform fieldwork, scaled drawings, and ROW acquisition findings. However, the project applicant would contribute a proportional fair share towards an engineering study to evaluate the potential for increasing the westbound left-turn lane storage based on its p.m. peak-hour vehicle trip contribution to the Bon Air Road/Sir Francis Drake Boulevard intersection. This would amount to a 8.2 percent fair share contribution toward future engineering studies relating to widening and ROW acquisition to lengthen the westbound left-turn lanes on Sir Francis Drake Boulevard at Bon Air Road. This requirement is added to Mitigation Measure TRA-7 on page 4.M-52 of the Draft EIR, as shown in response to Comment D-20.
- D-26: The project applicant would pay the full cost towards installation of traffic signals at the proposed project's southern main driveway. The applicant will deposit the estimated cost into escrow at end of Phase IV as an escrow account with the County of Marin. The specific timing will be coordinated with the County.
- D-27: Please see response to Comment D-21.
- D-28: Encroachment permits would be obtained from the County of Marin for any construction work performed within the Bon Air Road ROW. See response to Comment D-24 regarding the construction management plan the project applicant will prepare, which will describe site logistics for each phase of construction, and addresses all construction-related effects related to truck traffic.
- D-29-b: The construction impact analysis conducted for the Draft EIR reflects a "worst case" scenario for the most intense construction activity (Phase I), which reflects all haul from demolition, materials delivery, utility relocation, etc. The Draft EIR analysis recognizes that similar types of activity and effects would occur during other discrete (less-intense activity) periods, but at lower volumes and less impact.
- D-29-c: Please refer to response to Comments D-4 and D-24 regarding the construction management plan the project applicant will prepare, which will describe site logistics for each phase of construction, and addresses all construction-related effects related to vehicle access, pedestrians, bus and transit, and delivery of materials.

- D-29-d: Mitigation Measure TRA-2b would require modification to the design of portions of the project site's southern driveway that are internal to the site, which would be subject to County approval during the County Design Review process, but which would not require an encroachment permit for the work.
- D-29-e: Emergency access would be maintained consistently through all phases of construction at the proposed project's north and/or south driveways. The length of turn pockets within the median are based on the maximum length of the emergency vehicle. The inbound turn lane at the emergency vehicle only driveway within the median is approximately 60 feet, which would accommodate emergency vehicles (ambulances, fire/ emergency medical team trucks, etc.). It is noted that there would be no substantial delay for these emergency vehicles given the nature of their use (i.e., they would have ultimate right-of-way over Bon Air traffic during emergency events). Therefore, the length of the turn pocket would depend largely on the size of the emergency vehicle and would be reviewed by emergency responders prior to final installation.
- D-29-f: The proposed project would strive to be consistent with the County's policies, plans, and programs related to alternative transportation through continuation and expansion of existing programs and strategies, in addition to new strategies specified in Mitigation Measure GHG-2 (as revised in response to Comment D-23), and discussed at the bottom of page 4.M-28 in the Transportation and Circulation section of the Draft EIR.
- D-29-g: Please refer to response to Comment D-24 regarding the construction management plan the project applicant will prepare, which will describe site logistics for each phase of construction, and addresses all construction-related effects related to truck traffic (including deliveries and off-hauling of material, and restrictions to delivery hours).
- D-29-h: The Draft EIR traffic section evaluated the "worst case" impacts related to construction activity stating "The use of heavy trucks to transport equipment and material to and from the project site could affect road conditions by incrementally increasing the rate of road wear. The project's impact would be minimal on arterials (e.g., Sir Francis Drake Boulevard and Bon Air Road) and other designated truck routes that are designed to accommodate a mix of vehicle types, including heavy trucks. The above-described moderate increase in truck traffic during project construction would have a less-than-significant impact on the conditions of area roadways' pavement." The effect on pavement conditions is incremental (e.g., over a standard 20-year life span of the pavement), and detailed evaluation (e.g., Traffic Index analysis) is more relevant for permanent truck trip generation (e.g., quarry operations or landfills), not for short-term construction truck traffic. Considering that the most intense project construction-generated truck traffic increases would last for less than one-half of one year (four months), project construction would have a less-than-significant effect on the life of the pavement on Sir Francis Drake Boulevard and Bon Air Road.
- D-29-i: Please see response to Comment D-24 regarding impacts during project construction, and the construction management plan the project applicant will prepare for submittal, review

and approval by the County. This response assumes the commenter's reference to hours implies concerns with the noise associated with hauling. Project deliveries for both on-haul and off-haul materials would be restricted to occur at least in compliance with the County Municipal Code, so as not to disturb neighboring residences/businesses, and will be addressed in the construction management plan. Allowable construction-related hours begin at 7:00 a.m. on weekdays and 9:00 a.m. on Saturday, with use of loud noise-generating equipment (e.g., backhoes, generators, jackhammers) restricted to after 8:00 a.m. during the week only. This is an existing County regulation (and incorporated into Mitigation Measure NOI-2).

D-29-j: Please see response to Comment D-29-h.

D-29-k: Please see response to Comment D-13-i regarding off-site contractor parking, and the use of shuttle service for workers.

D-30-a: See response to Comment D-18-d.

D-30-b: See response to Comment D-1-a.



October 22, 2012

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Re: Marin General Hospital Replacement Building Project
Draft Environmental Impact Report

Dear Mr. Peluso:

Thank you for the opportunity comment on the Marin General Hospital Replacement Building Project Draft Environmental Impact Report (DEIR). The Transportation Authority of Marin (TAM) has the following comments for consideration.

1. Section 4 of the DEIR references TAM's 2009 Congestion Management Program (CMP) reports. The CMP reports are updated every two years. The most recent reports were published in 2011 (*Marin Congestion Management Program 2011 Update*, dated November 16, 2011, and *Transportation System Performance Monitoring Report 2010*, dated December 2011). These reports are available in the Transportation Planning section of TAM's website at, respectively:

- <http://www.tam.ca.gov/Modules/ShowDocument.aspx?documentid=5434>
- <http://www.tam.ca.gov/Modules/ShowDocument.aspx?documentid=5433>

2. TAM's proposed multi-modal transportation improvement project for the U.S. 101 Greenbrae/Twin Cities Corridor is referenced in the last paragraph on page 4.M-24. The project limits extend from 0.2 miles south of Tamalpais Drive to .03 miles north of the Corte Madera Creek Overcrossing (known as the Greenbrae Interchange). A notice of preparation of a draft environmental document was submitted to the state clearing house in the fall of 2009 and the draft environmental document is schedule to be releases in the fall of 2012 for public review and comment. TAM's proposed project currently does not have the improvements associated with a new eastbound lane on Sir Francis Drake Boulevard, described in the referenced paragraph. The limits of the TAM project extend west to the Sir Francis Drake/Eliseo Intersection. TAM supports

E-1

E-2

the concept of an east bound lane within the limits described in the paragraph and recommends further study of the concept.

↑ E-2
cont.

3. Transportation Demand Management (TDM) programs are listed in Mitigation Measure GHG-2 (page 4.F-15) as well as in Impacts TRA-1 and TRA-4 (pages 4.M-25 and 4.M-37, respectively). TAM strongly encourages the adoption of proposed mitigation measures a) through d), with some suggested additions, to reduce greenhouse gas production and traffic congestion. TAM also recommends that Marin General Hospital expand its Additional Transportation Demand Management Strategies to include items e) through g) below:

- a) Employee Commute Program. Develop and implement an employee commute program with specific actions and goals to provide on-site information to employees about commute alternatives to and from Marin General Hospital. Specific actions should include the administration of an annual commute behavior survey, implementation of mandated commuter benefit programs, and periodic incentives to promote and encourage commute alternatives to driving alone. Designate an employee transportation coordinator (ETC) to facilitate the program.
- b) Carpool and Vanpool Matching. Provide easy access to carpool and vanpool matching for employees, in coordination with the Metropolitan Transportation Commission (MTC), 511 Rideshare, TAM, or other agency or organization with this objective.
- c) Bicycle facilities. Provide additional secured bicycle parking facilities and employee access to shower and changing facilities, in order to encourage bicycle use by Marin General Hospital employees.
- d) Emergency Ride Home. Offer an Emergency Ride Home (ERH) Program that supports those who use commute alternatives to driving alone (or enroll in the countywide ERH program currently administered by TAM).
- e) Preferential Parking Program. Designate a percentage of on-site parking for carpool vehicles (exclusive of elderly and handicapped parking). Clearly indicate the location of the preferential parking spaces using appropriate signage.
- f) Vanpool Program. Support and promote the development of employee vanpools, in cooperation with MTC, 511 Rideshare, TAM, and other agencies offering incentive programs, as appropriate.
- g) Carshare Program. As hourly carshare service programs are implemented in the county, Marin General Hospital shall make available, at no charge, at least two parking spaces to establish a carshare pod easily accessed by employees.

E-3

The DEIR states "Within one calendar year after patient occupancy of the Hospital Replacement Building, the project applicant shall submit to the County appropriate documentation that demonstrates compliance with each of the aforementioned strategies. Each of the strategies shall also be extended to include employees of the Ambulatory Services Building, when that building is operational."

E-4

Mr. Ron Peluso
October 22, 2012
Page 3

Although the proposed TDM measures are intended to mitigate impacts of the completed project, TAM encourages Marin General Hospital to implement these measures during the construction phase of the project in order to maximize benefits to employees and the public. TAM staff is available to assist Marin General Hospital and coordinate with 511 Rideshare, as well as other agencies, to help develop Marin General Hospital's TDM programs.

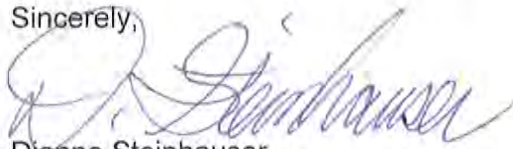
↑
E-4
cont.

It is TAM's understanding that the County of Marin, which has local jurisdiction regarding traffic impacts and mitigation measures during construction and operation of the proposed project, will provide separate comments.

↑
E-5

We appreciate the opportunity to comment on the Marin General Hospital Replacement Building Project DEIR. Please contact Linda M. Jackson, Planning Manager, at 415-226-0825 if you need further clarification of our comments.

Sincerely,



Dianne Steinhauser
Executive Director

cc: Bob Goralka, County Of Marin Public Works
Christy Garland, 511 Rideshare

Letter E Responses – Transportation Authority of Marin (TAM)

E-1: During the period of proposed project impact analysis, the TAM Congestion Management Plan (CMP) that was current (i.e., the 2009 CMP) was used. It is understood that the TAM CMP is updated every two years. However, the 2009 CMP was the most recent plan in publication during the period of analysis, and at the time that the Notice of Preparation was published. In addition, there were no material changes to the CMP between the 2009 and 2011 CMP Updates. Lastly, all transportation model volume projections used for the analysis were based on the most recent volume projections from the TAM model obtained from TAM staff and their modeling consultant.

E-2: At the request of County of Marin Transportation staff, the potential transportation improvement for Sir Francis Drake Boulevard (new eastbound travel lane from Bon Air Shopping Center to Highway 101 interchange) was referenced in the Draft EIR even though it would require further engineering and environmental studies.

E-3: See response to Comment D-23. The TDM program recommended as part of the overall mitigation for proposed project traffic impacts was developed in concert with Ms. Christy Garland, Employer Services Representative with *511 Rideshare*, the project applicant, and transportation consultant. Using the Marin General Hospital Transportation Survey Results report development for the project, TDM measures were recommended for both employees and visitors. The TDM plan was also reviewed by Marin County Transportation staff that made additional recommendations to the plan. Suggested TDM measures from TAM would be considered as part of any ongoing TDM plan for the proposed project.

Suggestions “e” and “f” are added to Mitigation Measure GHG-2, which is also modified to refer to TAM’s Emergency Ride Home program; see response to Comment D-23.

One recommendation not incorporated in the TDM measures in GHG-2 is the designation of at least two free carshare parking spaces onsite; it is not proposed primarily given the project’s parking shortfall and the combined other TDM strategies that the project will implement (see also response to Comment H-22).

E-4: See responses to Comment D-23 and D-17-g.

E-5: County of Marin comments on the Draft EIR are presented in Letter D.

Comment Letter F

From: Mills, Donna [<mailto:DMills@marincounty.org>]

Sent: Thursday, September 06, 2012 12:18 PM

To: Ron Peluso

Subject: Marin General EIR documents

Hi Ron,

I was in the process of reading the draft EIR documents and was looking at the map on page 4. I realize the map is not to scale but after looking at where some of the buildings like the Information Systems building is located I was thinking that on this map the Community Mental Health building was building 4? If that is correct, then I was wondering what happened to the bridge that connects us to the main hospital in the drawing? As you may know this has been the only connector with an elevator for our clients, and if that bridge is now being removed in subsequent plans, it would be nice to know about if now. I was told that the bridge would remain intact, so hopefully I am mis-reading the map and that we are actually per this map located in the East Wing...? Please just confirm if what I am assuming by the map is correct or not.

F-1

Thanks Ron

Donna Mills
Marin County Mental Health

Email Disclaimer: <http://marincounty.org/nav/misc/EmailDisclaimer.cfm>

Letter F Responses – Marin County Mental Health

- F-1: The existing connector bridge from the Central/East Wing to the Community Mental Health Building will remain in place with the project; no changes are proposed to the bridge. See Figure 3-5 on page 3-19 of the Draft EIR: the Community Mental Health Building is labeled as number 3 and the existing bridge is shown connecting to the Central (labeled 2A)/East Wing (labeled 2B).

Comment Letter G

From: Mills, Donna [<mailto:DMills@marincounty.org>]
Sent: Monday, September 17, 2012 2:28 PM
To: Ron Peluso
Subject: RE: Marin General Hospital - EIR documents

Hi Ron,

Hope all is well, I know you must be super busy at this time, so thanks for writing to us. I think the main thing we wanted to know about is timing. When we last spoke you stated sometime in the spring for breaking ground on the parking lot. Just checking to see if that is still in the works. I recently got confirmation that the bridge between the buildings is still in the plans to “keep”. I was pretty happy about that. Otherwise our questions are pretty much timing based. I guess you will know more after the October meeting? Thanks Ron.

G-1

Donna
Marin County Mental Health

Letter G Responses – Marin County Mental Health

G-1: Generally consistent with the project phasing discussion starting on Draft EIR page 3-36, while later than specified by the District, it is the District's goal to start Phase I of the project, the Hillside Parking Structure, in 2013. Phase II of the project is the Bon Air Parking Structure and would start after the Hillside Parking Structure is complete (spring 2014). Phase III is the Ambulatory Services Building and it will start a few months after the Bon Air Parking Structure (summer 2014). Phase IV is the Hospital Replacement Building and it will start in mid-2015.

Kentfield Planning Advisory Board

P.O. Box 304, Kentfield, California 94914

October 19, 2012

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

Via email: ron.peluso@naviganteconsulting.com

Marin General Hospital Replacement Project Draft EIR

Kentfield Planning Advisory Board members have the following comments on the draft Environmental Impact Report. Some of our concerns repeat comments we made in the 2011 scoping process. We look forward to a comprehensive review of the hospital's plans and impacts, including cumulative impacts, and recommended mitigations.

Project Description.

The project description (p 2-1) should be corrected to include renovation of 74,986 square feet of space in the old east/central wings.

H-1

Please note how much space each of the three wings occupies in the existing 292,786 square foot hospital (p. 3-8). This section indicates that the mental health building is included in the hospital although it is a separate building. Please clarify.

H-2

Please note (p. 2-2, para. 6) that although the project would not result in a net increase in the existing number of licensed beds on site it would significantly add to the number of beds that are in operation and the associated average daily census.

H-3

The square footage of the existing hospital on p. 3-8 is not the same as that in Table 3-1. Presumably the difference is due to the mental health building being included on p 3-8 and not on the table, but this is confusing. Please clarify.

H-4

The hospital's 2010 application to the County said that 67,726 square feet of the east and central wings would be shuttered and 45,684 square feet used for offices or other non-acute care services. The EIR describes full usage of the old wings including (p. 3-36) 20,420 square feet for departments relocating from off-campus space.

H-5

Please describe the current number of employees and patients of Marin General Hospital working or accessing facilities off-site who would be moved to facilities on the Bon Air site. Include 1240 S. Eliseo, 1300 S. Eliseo, 1350 S. Eliseo, Drakes Landing and any other off-

H-6

campus sites in use. Is this number in addition to the 426 new jobs? How does this affect trip generation and parking numbers?

↑ H-6
| cont.

Please provide a descriptive table for all locations and buildings on and off-site comparing current staffing, anticipated staffing in 2018, and in 2035.

| H-7

Table 3-1 does not appear to include usage of the old, renovated wings. Please review this chart to insure that all usable square footage and employee numbers, including for the re-used older wings, is integrated into descriptions of all construction phases, and ensure that estimated parking need at project completion is based on a fully-used non-acute care services building.

| H-8

Clarify whether all 235 licensed beds are designated for the hospital or whether the 17 beds in the Mental Health Building are separately licensed to the County and, if they are, whether there are any differences in building or licensing standards for those beds. This is not clear in the EIR.

| H-9

Aesthetics. A modified campus design could improve views of the campus from Bon Air Road and the park more effectively than the vegetation that is proposed.

Please explore in depth Alternative C (p 5-44), or a similar configuration, as a CEQA design alternative, to reduce the visual impact of the proposed changes by making the Ambulatory Services Building (ASB) more obvious to the public than the parking structure and thus minimizing the feeling of the north end of the campus being the “back door.” Consider the possibility of moving the Ambulatory Services Building location in Alternative C slightly back from Bon Air Road so that it is closer to the existing hospital building and yet facing Bon Air Road.

| H-10

Please provide a visual simulation of the Hillside Parking Garage as seen from the Spy Glass condominiums above the site.

| H-11

Please also consider if there are building materials and design features for buildings that could reduce the perception of bulk and mass of the new structures.

| H-12

Land Use & Planning. Describe impacts that a Development Code amendment to permit the Ambulatory Services Building would have on similarly zoned properties, and on surrounding commercial/medical properties which are largely in Larkspur.

| H-13

Transportation/Circulation. The EIR may not have provided complete data on employee growth, traffic flow and parking needs during construction and usage of all campus buildings as they are brought online. The EIR continues to count off-campus parking spaces at St. Sebastian’s as secured parking despite no contract being included that guarantees continued exclusive use of these spaces. In addition, transit demand management (TDM) strategies that are suggested may not be adequate to address the hospital’s high solo driving rate and constrained parking resources.

| H-14
| H-15
↓ H-16

Changes in employee and patient numbers affect not only traffic volume and parking need, but also impact the greenhouse gas emission volume.

↑H-16
| cont.

Appendix B states (p. B-43) that MGH currently has 148 beds available with a current average daily occupancy of 126 beds. The proposed MGH replacement building would add 87 hospital beds to the current 148 beds in operation, bringing the total number of usable beds up to the full complement of 235 beds for which the hospital is licensed by 2035. The Appendix states that 59 of these beds would be added by year 2018 and 87 total beds added by year 2035.

In describing work on the final construction phase – for a Nursing Unit Infill Project at the new hospital, the EIR states, on p. 3-40, that 1) work in this phase involves construction of a 28-bed nursing unit in the south pavilion of the new hospital. 2) A total of 140 new employees associated with the new nursing unit would result during this phase, for a total of 426 new employees at build-out (when combined with the 286 new employees in the Phase III Ambulatory Services Building). The Appendix further states that added hospital beds associated with hospital replacement buildings and the new ASB are expected to generate additional vehicle trips on adjacent streets.

H-17

The question this raises is why the EIR does not expect that new employees would be added to the campus as a result of: 1) staff being moved in to the renovated east/central wings from off-site locations; and 2) the 59 additional beds (increased from the 148 beds currently available for use) that would come online by 2018 as the new hospital is occupied. If the 28-bed unit that becomes operational in the last phase requires 140 new personnel it seems reasonable that the earlier substantial increase in the number of beds being used and occupied would also need more medical personnel. Please verify the number of employees that would be on-site in 2018 and at project completion, expected on or before 2035, and correct tables and text accordingly.

In addition to the analysis of truck trips to remove soil (p. 3-63/64), please provide a complete analysis of the increase in vehicle trips due to on-site construction workers who are not driving dump trucks and recommend a solution to mitigate parking requirements and increased traffic in the area beginning with the construction of the Hillside Parking Garage. Please include a vehicle analysis for each phase of the construction project through 2035. Provide the location of the described lease of the “off-site” parking lot(s).

H-18

Please provide the statistics for the number of vehicles currently arriving in the vicinity whose ultimate destination is Marin General Hospital and thereby use parking spaces during maximum weekday usage. Include the vehicles that park on site, on the nearby roadways, at St. Sebastian’s, in other parking lots served by valet or shuttle services, the parking lots at the South Eliseo buildings leased by the hospital, etc.

H-19

In light of the statement on page 4.M-38 that 89% of Marin General employees drive alone, with an average commute of 19.2 miles, please describe the estimated county of residence for the 426 new jobs. Please provide analysis of the residential location of the current employees and their average annual salaries categorized by residential location, as well as the expected annual salary of the employees for the proposed new jobs. Include in your analysis the location where your

H-20

employees enter the major access roads to the hospital including Highways 580, 37, 101 and Sir Francis Drake Boulevard.

To support the information on estimated traffic increases in the Sir Francis Drake corridor, please provide the vehicle count for the westbound direction of the Richmond-San Rafael Bridge for each of the past 5 years in chart form.

H-21

Please outline in detail a van pool solution to reduce traffic flow to Marin General for employees and construction workers and describe how it would be accomplished in the short term to relieve congestion beginning with the construction phase of the project, and continued throughout the life of the hospital. MGH might be able to work with other local shuttle users, such as Whistlestop, to share use of vehicles for odd hour shift changes when those vehicles might otherwise be idle.

H-22

For the long term, please outline the measures that have been required of Stanford Hospital and other hospitals to reduce traffic impacts.

H-23

Please recommend mitigation measures to protect public parking for residents of the community, users of the recreational facilities, nearby offices and residential neighborhoods near the site if Marin General were to choose to charge a fee for parking on their site or if there becomes a shortage of available on-site parking. (Example: UC San Diego’s Hillcrest Hospital).

H-24

If St. Sebastian’s Church is to be a parking alternative, provide the long term lease/deed restriction that guarantees the hospital use of the required number of parking spaces for the life of the buildings on the hospital site.

H-25

Describe in detail how the Hillside Parking Garage could be expanded to provide additional parking to meet the parking deficit upon full occupancy of the old wings with non-acute care personnel. Include the possibilities of increasing the height, or expanding the footprint, or a combination of both. Include illustrations.

H-26

Please describe the consideration of personal safety for people parking on site and what staffing would be needed for personnel and visitor protection, particularly in the secluded garage areas.

H-27

Provide an analysis of the location of the proposed crosswalks with regard to safe pedestrian crossing.

H-28

Provide graphic representation of proposed traffic improvements, e.g. additional lane on SFD; include aerial views of changes proposed to Bon Air Road (parking location/configuration, lanes, medians, pedestrian and bicycle movement, access points) that would occur. Enumerate the number of public parking spaces which would be lost and represent the changes to proposed landscaping which are required to improve sight distance on the roadway. Use overlays to show proposed changes to Existing conditions.

H-29

Please elaborate on what is being suggested in Mitigation Measure TRA-7 (p. 2-25) for an eastbound through lane at Eliseo Drive, and provide a graphic to help explain it.

↑ H-29
cont.

Include a chart showing the number of current public parking spaces compared to the proposed number of public parking spaces at the various stages of the project.

↑ H-30

Please describe how many additional parking spaces would be needed on site for the purposes of traffic and circulation to allow visitors/staff to find an open space. Describe possible electronic methods of making known the location of available spaces to the arriving staff/visitors.

↑ H-31

Greenhouse Gas/Climate Change.

Solar Energy: Using solar energy experts, please describe how solar energy could be captured on all rooftops on the site, including the two older hospital buildings, the two garage roofs, the ambulatory care building, and the new acute care facility, as mitigation for GHG. Also include the possibility of capturing solar energy on the sides of the building, and from the window areas.

↑ H-32

Geothermal: Using geotechnical experts, analyze the capability of using geothermal energy conservation practices on the MGH site, providing a reasoned analysis of the possibilities. The geothermal installation at the College of Marin is an example.

Yours truly,



Anne Petersen, KPAB Chair
KPAB Members: Alan Derwin, Sandy Guldman, Dale Hansen,
Eva Long, Pamela Scott, Mary Sylla; Ann Thomas, Secretary

Cc: Greenbrae Property Owners Association
Kent Woodlands Property Owners Association
Larkspur City Council
Jeremy Tejirian, Marin County Community Development Agency
Cara Zichelli, Marin County Department of Public Works
Supervisor Katie Rice

Letter H Responses – Kentfield Planning Advisory Board

H-1: The following additional text is added at the end of the third paragraph on Draft EIR page 1-1, and the last paragraph on Draft EIR page 2-1:

The project will also renovate approximately 75,000 square feet within the existing hospital.

H-2: The existing Central/East Wing is about 160,000 square feet, and the existing West Wing is about 95,000 square feet.

The following text is added to the second sentence on Draft EIR page 3-8:

The hospital has three wings: Central, East and West Wings, and also includes the Marin Community Mental Health Building adjacent to the existing hospital building. The hospital is licensed to have up to 235 beds, and currently has 148 beds in use. ~~There are a total of 235 licensed beds on the campus,~~ including 17 beds in the Mental Health Building.

H-3: The following text is added to the end of the sixth paragraph on Draft EIR page 2-2; and to the end of Draft EIR page 3-16:

The project would not result in a net increase in the existing number of licensed beds on the project site; however, 87 new beds would be added to the 148 beds currently in use onsite.

The following text is added to the end of the *Hospital Replacement Building* paragraph on Draft EIR page 3-29:

The new hospital would continue to operate with 235 licensed beds resulting in a net increase of zero licensed hospital beds for the project; 87 new beds would be added to the 148 beds currently in use onsite, matching the number of beds licensed for the project site.

Table 3-1 on Draft EIR pages 3-37 and 3-38 is revised to clarify 148 beds in use in Existing Conditions through Phase III, 59 beds for use added in Phase IV, and 28 beds for use added in Phase VI, as presented in Chapter 3 (Change to the Draft EIR) in this document.

The following text is added to the second sentence on Draft EIR page 4.M-26:

On the basis of 59 new beds to be added to the current ~~average daily census (ADC)~~ ~~of~~ 148 beds in use by Year 2018, and 28 beds to be added by Year 2035 (for a total

of 235 beds), plus a new 100,000 square-foot ambulatory services building, the proposed project would generate about 4,440 daily trips ...

The following text is revised in footnote #1 on Draft EIR page 6-3:

Although the number of licensed beds would not change, the number of beds available for use would increase ~~ing use can increase or decrease depending on demand.~~

(Also see the text revision regarding existing bed count presented in response to Comment H-2.)

- H-4: The commenter's presumption is correct, as footnote "a" in Table 3-1 starting on Draft EIR page 3-37 explains.
- H-5: The project that is analyzed throughout the Draft EIR is consistent with that described in the 2011 Notice of Preparation of the EIR and the result of work by the District to continue refining the proposed project in coordination with the County. No space in the existing hospital will be "shuttered"; all space will be renovated and reused by existing hospital functions.
- H-6: Approximately 58 employees currently work in 20,420 square feet of hospital-affiliated uses in space at properties leased by Marin Healthcare District (as discussed on Draft EIR page 6-9, second full paragraph). To the extent that these employees could relocate to the main campus, they are included in the 286 new employees associated with the proposed Administrative Services Building in Phase III (see Table 3-1 on Draft EIR page 3-37) and thus already considered in the Draft EIR analysis.

With regard to traffic associated with these employees, 20,420 square feet of office uses (currently off site) would equate to 30 p.m. peak-hour vehicle trips. These employees are already traveling on the analyzed street network and are part of the existing base volumes counted for existing conditions, particularly through the Highway 101, Sir Francis Drake, and Eliseo corridors. To add these trips on top of proposed project trips would double count them. Given the overall distribution of hospital trips, these employee trips would have no measurable effect on traffic and are already traveling to/from the MGH campus; these trips would not change the conclusions or recommended mitigation measures for Bon Air Road, project driveways, or intersection operations in general. Moreover, these employees would not trigger additional parking, which is calculated on building square footage (for the Administrative Services Building) or number of hospital beds (for the Hospital Replacement Building). Also, it is assumed that the vacated 20,420 square feet of space would be re-occupied by similar medical-related uses, with similar traffic and parking patterns as current conditions.

- H-7: See responses to Comments H-6. The only staffing that is relevant to the environmental analysis for the proposed project are those currently on the project site and those that may

- relocate to the site. The anticipated staffing in 2018 and 2035 is as shown in Table 3-1 starting on Draft EIR page 3-37).
- H-8: Uses that will occupy the renovated Central and East Wings of the hospital are not new uses. The renovation of these wings would address overcrowded or otherwise poorly functioning *existing* department spaces within existing overall space. The changes to all portions of the existing hospital are adequately shown in Table 3-1 and appropriately captured in the analysis of the project. See response to comment H-17.
- H-9: What is relevant to the environmental analysis is that there are a total of 235 licensed beds on the campus, including 17 beds in the Mental Health Building, as indicated first in the third sentence on Draft EIR page 3-8 (and as modified in response to Comment H-2). The beds in the Mental Health Building are considered “acute psychiatric services” that are excluded from the definition of “General Acute Care Hospital” and are not subject to Seismic-safety legislation Senate Bill (SB) 1953. However, they are held to the same licensing standards.
- H-10: The analysis of Non-CEQA Design Alternative C on Draft EIR page 5-44, and as presented for each topic area in Draft EIR Table 5-2 (starting on page 5-45), is adequate to present this Non-CEQA alternative’s comparative environment effects to those of the proposed project (as well as those identified for each of the other CEQA and Non-CEQA alternatives). Specifically, the assessment provides the information necessary for the decision makers of the project to fully consider the adequacy and findings of the EIR (although the non-CEQA design alternatives are not triggered by the need to reduce a significant impact identified for the project), and then matters of policy and design around the project’s merits.
- Regarding a modified layout that moves the Ambulatory Services Building back from Bon Air Road and closer to the existing hospital, as shown conceptually in Figure 5-1 on Draft EIR page 5-42, the physical site area available to achieve this modified layout is substantially constrained by the existing hospital and Mental Health Building and the intended goal of minimizing the length of the Bon Air Parking Structure fronting Bon Air Road. Likely the footprint of the Ambulatory Services Building would have to be reconfigured and/or its height increased; thorough consideration of these constraints drove the configuration of Non-CEQA Design Alternative C depicted in the Draft EIR.
- H-11: See response to Comment M-1.
- H-12: As discussed in the third full paragraph on Draft EIR page 4.A-12, the project is subject to County Design Review, which will involve a review of detailed exterior building materials and project finishes that the applicant will have refined by that time, and that will also consider the overall project site configuration. To the extent that final materials and finishes reduce the perception of bulk and mass of new structures, the project applicant will certainly consider proposed treatments with the County. Such design details are not required for an adequate EIR for this project.

Also see Figures 2-1 through 2-9 in Chapter 2 (Project Clarifications and Additional Information) of this document, which includes a series of exhibits that clarify the dimensions and setbacks of all the proposed project buildings.

H-13: County of Marin staff determined that the Ambulatory Services Building would not require an amendment to the Development Code to occur on the project site. As indicated on Draft EIR page 3-27, the Ambulatory Services Building would function as an integral component of the Hospital Replacement Building, providing acute care services and physicians directly responsible for inpatient and outpatient continuity of care. The hospital does not intend to lease space in the Ambulatory Services Building to non-hospital affiliated medical practices with infrequent hospital admissions. As such, the Ambulatory Service Building would not be considered a stand-alone medical office building use, requiring a Development Code amendment to be introduced to the project site within the Public Facilities District (PF) Zone.

H-14: The number of employees that would be onsite throughout construction and at buildout of the project is accurately summarized in Table 3-1, starting on Draft EIR page 3-37. Also see response to Comment H-17.

Regarding traffic flow needs during construction, as stated in response to Comment D-3, Impact TRA-6, which starts on Draft EIR page 4.M-45, addresses construction-related traffic and transportation impacts. Also see response to comment D-1-a. Traffic flow needs during operation of the project are thoroughly discussed throughout the Transportation and Circulation section of the Draft EIR, specifically in Impacts TRA-1 through TRA-3, TRA-5 and TRA-7.

H-15: See response to Comment H-19.

H-16: See response to Comment D-23 regarding TDM strategies.

H-17: In the first two paragraphs of the comment, the comment accurately restates Appendix B to the Draft EIR regarding existing and proposed beds and staffing. The number of employees that would be onsite in 2018 and at project completion is accurately shown on Draft EIR Table 3-1, throughout the Draft EIR and its appendices.

Regarding question #1, as described under *Renovation of Existing Hospital Wings* starting on Draft EIR page 3-35, the renovated portions of the Central and East Wings of the existing hospital would allow for the expansion of adjacent departments in these wings and would not result in a notable increase in staff on the project site, including considering staff that could relocate to MGH from off-site locations (see response to Comment H-6). The renovation of these wings would address overcrowded or otherwise poorly functioning *existing* department spaces. While not anticipated, even if the expanded spaces would add new employees – the number would be too few to affect the impact analysis of the overall project, as explained in the footnote on Draft EIR page 3-36.

The following addresses question #2 regarding staff associated with the 59 additional beds to come online in 2018. The hospital is licensed for 235 beds, and that will not change with the project although the number of beds in use can increase or decrease depending on demand. Currently, the hospital has the flexibility to staff and operate up to 207 beds. Environmental Services, Dietary Services, Engineering, and other support services required to maintain the hospital do not vary by bed population. This support staffing is fixed and at current levels it can support up to 207 beds. On the other hand, the hospital nursing population varies based on bed count: the more occupied beds the more nurses that are required; the fewer beds, the fewer nurses.

Nurse staffing ratios (patients to nurse) vary by department. The majority of beds are in areas where ratios are either 5 patients to 1 nurse (5:1) or 4:1. The 10-bed ICU department (where nurse to patient ratios are 1:1) was 80 percent occupied in 2010 (8 of 10 beds); the 10-bed CCU department (where nurse to patient ratios are 2:1) was 40 percent occupied in 2010 (4 of 10 beds).

Based on this 2010 data and assuming 100 percent occupancy, using 2 more ICU beds would add 2 more nursing staff and using 6 additional CCU beds would add 3 nurses. The project does not anticipate adding any more ICU or CCU beds, so all 51 new beds will be in Medical/Surgical areas with 5:1 or 4:1 ratios. Applying an average ratio of 4.5:1, the 51 new beds will increase nursing staff by 12 ($51 \div 4.5 = 11.3$ rounded up).

Using these ratios, a patient bed count increase from 148 beds to 207 beds (i.e. the 59 additional beds to come online in 2018) would increase the nursing staff by 17 (assuming 100 percent occupancy). The hospital does not plan to increase support service staffing until the final phase of the project when the 28-bed nursing unit comes on line and all of the patient rooms are private.

In reviewing MGH staff population assumptions to prepare this response to comment, MGH found it had mistakenly estimated that no additional staff would be needed to serve the 59 additional beds coming online in 2018. Therefore the total employee headcount required for the project was understated by 17 nurses. As discussed in Chapter 2 (Project Clarifications and Additional Information) of this Final EIR, adding 17 nurses to the 426 workers assumed in the Draft EIR represents a 4 percent increase.

Employee headcount is used in the EIR for the CEQA analysis of greenhouse gas emissions by service population; population, housing, and employment; and public services and recreation. No other environmental topics under CEQA are affected as they rely on other variables in calculating project-related effects (e.g., number of beds, square footage). Factoring in the additional 17 nurses qualitatively or quantitatively does not materially affect the analyses or conclusions for these topics, as demonstrated in Chapter 2 in this document.

Employee headcount is also used for the non-CEQA hospital-related parking demand assessment. With the additional 17 staff, the parking surplus at 2018 is reduced, and the

parking deficit is increased in 2035, as reflected throughout this document and also detailed in Chapter 2 (Section 2.4, *New Employees Associated with the Project*) of this document.

H-18: Please refer to response to Comment D-24 regarding impacts during project construction, and the construction management plan the project applicant will prepare, and to response to Comment D-13-i regarding off-site contractor parking.

H-19: The best description of the current use of on-site and off-site parking spaces, and the sources for determining the existing parking demand and parking demand rate (spaces per employee) can be found on Draft EIR pages 4.M-16 to 4.M-18. As described on those pages, vehicle parking for existing Marin General Hospital uses is currently provided by on-site surface lots and an off-site satellite lot, for a combined total of 695 parking spaces. This includes 605 parking spaces in on-site lots located primarily along the western portion of the project site (bordering Bon Air Road) and select lots located within the campus hillside. MGH has a parking agreement with St. Sebastian's Church located just northwest of the Campus on Bon Air Road. In this church lot, there are 90 parking spaces dedicated to MGH employees.

As recommended and discussed on Draft EIR page 4.M-56 (for Year 2018 parking) and 4.M-57 (for Year 2035 parking) (as revised in this Final EIR), St. Sebastian's Church and MGH executed a new lease agreement extension that would continue this arrangement for 90 dedicated parking spaces for a five year term with three one-year options, thus securing the parking spaces until 2021. It would be reasonable yet speculative to suggest that this arrangement could be further extended starting in 2021 given this long-term (23 years, since 1990) leasing relationship between the church and MGH. However, the Draft EIR disclosed on page 4.M-57 that without the 90 parking spaces dedicated to MGH employees, the project would have a parking deficit of 104 spaces at 2035, which would also be the deficit at 2021, pending further extension of the current lease agreement. This compares with the current deficit of 128 spaces onsite, meaning that even without the 90 church spaces, the hospital would have a lower deficit and cause fewer parking availability issues in surrounding neighborhoods (as discussed on Draft EIR page 4.M-57).

In addition, there are 73 off-site parking spaces located along Bon Air Road (total on both sides of the street) along the project frontage, which are available to the general public, patrons, and residents of other nearby uses as well as to visitors / employees of Marin General Hospital. These on-street parking spaces along Bon Air Road were not included in Draft EIR's evaluation of the overall MGH parking supply. However, observations indicate that the majority of these off-site parking spaces are filled prior to and/or by 7:00 a.m., primarily by MGH employees. Primary access to the on-site parking facilities is provided by southwest and northwest full-access driveway entrances. The majority of parking spaces can be accessed by employees and/or visitors, and designated emergency and service vehicle parking lots are clearly marked (restricted). The parking at the South Eliseo buildings leased by the hospital are currently used by the hospital-related uses

therein. To the extent some of those uses relocate to the project site, the parking demand for those uses are captured in the onsite project parking analysis already.

H-20: It is not possible to know the estimated county of residence for the 443 new employees. However, the distribution of proposed project trips for the project was informed by this information about current hospital employees and patients, as well as research conducted by 511.Org using Marin General Hospital employee demographics. The discussion of *Trip Distribution and Assignment* starting on Draft EIR page 4.M-26, explains that trip distribution information of current hospital employees and patients was used to determine the distribution of project trips. Consideration was given to residential distributions (where employees live and thus might enter the major access roads to the hospital, as shown in the “place of residence” table below), primary access routes in the vicinity of the hospital campus and peak-period directional traffic counts at all hospital driveways. (Draft EIR Figure 4.M-5 illustrates the project vehicle trip distribution throughout the roadway network.)

The commenter asks for the analysis of the residential location and salaries of existing Marin General Hospital employees. Because neither of these data are directly pertinent to the CEQA analysis (beyond informing trip distribution, noted above), this is not information typically provided in the EIR. The following residence and salary information for existing Marin General Hospital employees are provided from the *Population, Housing and Employment Assessment* (Conley, 2011) prepared for the project and which is available as part of the references record for the Draft EIR, available at the Marin Healthcare District’s offices (as stated at the bottom of Draft EIR page 1-5).

CURRENT MGH EMPLOYEE PLACE OF RESIDENCE

9 County Bay Area	Employees	% of Total
Marin County	690	45.60%
Alameda County	80	5.29%
San Francisco County	99	6.54%
San Mateo County	20	1.32%
Sonoma County	254	16.79%
Napa County	25	1.65%
Santa Clara County	6	0.40%
Contra Costa County	180	11.90%
Solano County	114	7.53%
Subtotal	1,468	97.03%
Other California Counties	25	1.65%
Other/Out of State	20	1.32%
Total MGH Employees*	1,513	100.0%

* Excludes 227 employees who earn more than \$119,000 annually. Of the remaining, all MGH staff are reflected, including full-time, part-time and contract employees, thus the total shown is different than current existing 1,412 full-time equivalent (FTE) employees used for the Draft EIR.

SOURCE: Conley Consulting Group, Marin General Hospital April, 2011, Table 2.

2010 MGH EMPLOYEE WAGES

Income Category (family of four)	Employees*	% of Total
Extremely Low (\$0-\$32,250)	383	22.95%
Very Low (to \$53,750)	344	20.61%
Low (to \$86,000)	382	22.89%
Median (to \$99,400)	137	8.21%
Moderate (to 119,300)	196	11.74%
Above \$119,300	227	13.60%
Total	1669	

* Includes all MGH staff that worked for the hospital in 2010, regardless of the time worked. Therefore, many staff included in the lower income categories may actually be high salaried workers who only worked a portion of the year or at part-time. Also for this reason, the total shown is greater than current existing 1,412 full-time equivalent (FTE) employees used for the Draft EIR.

SOURCE: Conley Consulting Group, Marin General Hospital April, 2011, Table 4.

H-21: The westbound flow of traffic on the Richmond-San Rafael Bridge has no direct correlation to traffic volumes in the Sir Francis Drake Boulevard corridor. The Sir Francis Drake Boulevard corridor is accessed by Highway 101 and many arterial facilities, and not solely vehicle traffic to/from the Richmond-San Rafael Bridge. That being said, the distribution of proposed project trips was based on research conducted by 511.Org using Marin General Hospital employee demographics. Therefore, the Draft EIR-estimated increases in project traffic to/from the east (using the Richmond-San Rafael Bridge) traveling on Sir Francis Drake Boulevard are reasonable. The five years of information requested in chart form by the commenter is not provided.

H-22: Mitigation Measure GHG-2, modified in detail in response to Comment D-23, includes TDM strategies for (b) Carpool and Vanpool Matching, and (f) Vanpool Program Support, which are consistent with the commenter's suggestion. Both of these strategies involve the hospital's coordination with other local shuttle services, as well as support for initiatives that would specifically provide shuttle services to the project site as part of a larger network, especially including the ferry terminal. These vanpool strategies were identified through the coordination of MGH's Employer Services Representative work with *511 Rideshare*, based in large part on the employee feedback to the Marin General Hospital Transportation Survey Results, the project applicant, and transportation consultant.

The District has not proposed to lease vehicles to provide vanpool services for MGH employees. This action is not required to reduce the project's GHG emissions impact to less than significant (as discussed starting on Draft EIR page 4.F-16), and given the reasonably expected level of employee participation³, the resulting reduction in the a.m. and p.m. peak hour trips would not avoid or substantially reduce the significant traffic

³ Six to seven percent of total employee commute trips with the hospital is conservatively assumed, based on *511 Rideshare*'s experience that ridesharing programs typically attract five to 15 percent of commute trips if they offer information and encouragement (see discussion of *TDM Program Measures Effectiveness* starting on page Draft EIR page 4.F-16).

impacts identified for the project. In other words, the hospital's actual leasing of vanpool vehicles, versus increasing its implementation of TDM measures focused on employee carpool/vanpool participation and coordination with existing programs in the county, would not avoid or substantially reduce any significant impact identified for the project.

Also see response to Comment D-24 regarding measures addressing congestion during the construction phase.

- H-23: The commenter requests information that is not directly relevant to the adequacy of the Draft EIR for the proposed project, however, it has consulted with Kaiser Permanente San Rafael on its TDM program (see response to Comment H-22). The TDM strategies included in Mitigation Measure GHG-2 (as revised in the Comment D-23 response) have been formulated based on extensive project-specific considerations developed through direction from Marin County staff, collaboration with 511.Org, review of similar TDM mitigations for other Bay Area hospital project EIRs, as well as input from TAM and other commenters on the Draft EIR.
- H-24: The project does not propose to charge a fee for parking. See response to Comment J-10.
- H-25: See response to Comment H-19.
- H-26: The project would have an overall deficit of 104 parking spaces, which would be reduced to a deficit of 14 spaces with the long-term shared parking agreement with the St. Sebastian's Church to Year 2021 (as revised in this Final EIR); see the second paragraph of response to Comment H-19. Draft EIR Figure 3-9 shows that the upper parking levels provide up to 80 total spaces. Assuming the unlikely but conservative assumption that the deficit would be 104 spaces (after 2021), the Hillside Parking Structure would require an additional split parking level. Specifically, as depicted on Figure 2-8 in Chapter 2 (Project Clarifications and Additional Information) of this Final EIR, Level 6 would be extended to the full length of the structure, and a half-length Level 7 (like proposed Level 6) would be added. This would increase the height of the structure by about 15 feet 8 inches (to parapet). The potential visual effects of either option can be imagined by looking at Figures 2-11 through 2-15 in Chapter 2 (Project Clarifications and Additional Information) of this Final EIR, which are photos and visual simulations of the proposed Hillside Parking Structure as viewed from residential areas uphill to the northeast and east of the project site, and picturing another parking level added.

The additional parking spaces could be addressed by adding a parking level to the Bon Air Parking Structure, but with worsened visual effects.

The additional parking spaces could be addressed by developing underground parking, which is not proposed for either of the proposed parking structures due to site conditions that limit the practicality of underground parking: shallow water table, deep bedrock, need for substantially more excavation and grading activities, thus increasing the effects to

geology/soils, hydrology and water quality, off-haul trips, and biological resources, including tree removal.

Alternatively, expanding the footprint of the Hillside Parking Structure would allow its height to be reduced. Roughly estimated, to accommodate 93 more spaces and lower the height of the structure from five stories to four levels, the footprint of the structure would need to increase by about 25 percent in area.⁴ This rough estimate includes the additional land area necessary to maneuver for construction. Compared to the proposed Hillside Parking Structure, this scenario would involve substantially more grading, excavation, and tree removal from the hillside, contributing to the effects on water quality and biological resources. The relative aesthetics effects on views from the uphill residential areas to the northeast and east would be reduced, however the structure would be more expansive across the hillside, to the extent that it would be visible from the westerly viewpoints (see Draft EIR Figure 4.A-13).

H-27: Marin General Hospital would continue to contract with a private security company for the provision of security services onsite, which would continue to conduct security operations, including during project construction. The project design will consider preventative design measures for the installation of landscaping, lighting, pedestrian walkways, etc., which the County Sheriff's Office will review as part of standard development practice and prior to final project design.

H-28: See response to Comment D-13-e.

H-29: Proposed and recommended improvements along Sir Francis Drake Boulevard and Bon Air Road can be found in related transportation studies and the Draft EIR Transportation and Circulation section. Specifically, the proposed eastbound through-lane on Sir Francis Drake Boulevard has been provided in a graphic depiction from the Highway 101 Greenbrae / Twin Cities Corridor study (see response to Comment D-6). Also see response to Comment D-20 which provides further detail about the eastbound through lane at Eliseo Drive; no further graphic depictions are necessary to adequately describe this improvement for purposes of this EIR or to fully respond to this comment.

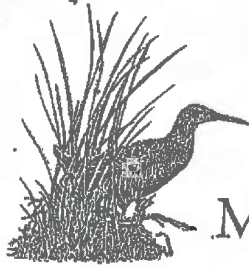
The proposed project site plan depicts the anticipated changes in vehicle and emergency access as depicted in Figure 3-5 of the Draft EIR. With regard to the number of parking spaces lost as a result of new driveway access, please refer to response to Comment D-13-f.

H-30: The change in project parking by phase is accurately shown in Table 3-1 on Draft EIR pages 3-37 and 3-38. Also see responses to Comments H-19 and H-30.

⁴ Each full parking level in the Hillside Parking Structure provides approximately 80 spaces and aisles/ramps. A 25 percent footprint increase to reduce the proposed structure from five levels to four assumes that each level of 80 spaces could add 20 spaces – which would each be about a 25 percent expansion of the four existing levels (of 80 spaces).

- H-31: The number of parking spaces needed to satisfy the peak demand has been identified in the Draft EIR Transportation and Circulation section for Year 2018 Short-Term plus Project conditions (Draft EIR Table 4.M-16, page 4.M-56), and Year 2035 plus Project conditions (Draft EIR Table 4.M-17, page 4.M-57, as revised in this Final EIR). With regard to electronic methods of indicating parking space availability, it is likely that the proposed Hillside and Bon Air parking structures will have electronic indicators to enumerate the number of available spaces within each facility at any time.
- H-32: The project may incorporate new trellises with a photovoltaic (PV) system on the top levels of the two new parking structures, pending funding availability. The potential configuration is shown on the parking structure sections on pages 2-6 and 2-8 in Chapter 2 (Project Clarifications and Additional Information) of this Final EIR, and described on Draft EIR page 3-49. The District is still exploring the extent to which it can gain energy reductions with the PV system for the project. As discussed on Draft EIR page 4.F-17, this possible project element is not required to mitigate the significant GHG emissions impact with the project, however, as indicated above, the District continues to consider their inclusion with the project.

The District has not considered geothermal energy as an emergency power source or an alternative power system (e.g., replacing one or more boilers, full-time electricity supply operating the hospital). The District is aware of the College of Marin's proposal to develop a geothermal field in a number of its parking lots (totaling approximately 40 +/- acres south of Corte Madera Creek). As appropriate, the District will consider the suitability of this technology for the Marin General Hospital campus, which is limited due the small, fully developed area.



Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | MARINAUDUBON.ORG

October 17, 2012

Marin Healthcare District
100 Drakes Landing Road
Greenbrae, CA 94904

RE: MARIN GENERAL HOSPITAL EXPANSION DEIR

Dear Sirs:

The Marin Audubon Society appreciates your consideration of our comments on the Draft Environmental Impact report for the Marin General Hospital Expansion project.

The DEIR reports the purpose of the project is to comply with the Hospital Facilities Seismic Safety Act which requires that acute care hospitals be designed and constructed to withstand a major earthquake. The project is a phased development consisting of a 300,000 square-foot hospital-replacement building, a 100,000 square foot ambulatory services building, and two parking lots – one with a 412-space lot built into the hillside and a 507-space structure - on Bon Aire Road. Most of the existing buildings would remain and be used for non-acute care purposes with 15,500 square feet of existing ancillary buildings would be removed.

Marin Audubon is particularly concerned about adverse impacts of the huge new structures on the on-site and nearby woodland and wetland habitats, including glare from nighttime lighting, increased quantity and degraded quality of runoff from the additional impervious surfaces, and direct habitat loss resulting from the removal of native trees.

We found that the DEIR minimizes the significance of environmental impacts which contributes to the inadequacy of recommendations for mitigation measures. In addition, the alternatives analysis does not present an adequate range of alternatives. We request that the following information be provided in the final EIR:

1. Some 230 native heritage size trees, as defined by the Marin County Heritage Tree Ordinance, would be removed. Most appear to be located in the wooded hills above the existing buildings, but the information provided is not sufficient to identify their location.

These wooded hills are habitat for woodpeckers and other woodland birds, and the habitat value should not be lost. How much natural woodland habitat (not landscaping) would be destroyed with the project? The only existing conditions site plan we could find, (figure 3-4) does not show existing trees. An existing conditions plan should be provided that shows existing trees so that a comparison can be made with the proposed project.

2. The specific species, size and location of these trees to be removed should be provided. This information is necessary for us to evaluate the mitigation.

3. The mitigation for the tree loss is the planting of 264 trees in the landscaping around the buildings. Given that mature, native trees growing in a natural setting would be removed, landscape planting would not be adequate to compensate for the tree loss. The landscape concept plan shows some species that are not native. Only species native to the area should be considered as mitigation.

I-1

I-2

I-3

I-4

I-5

Post-It® Fax Note	7671	Date	10/17	# of pages	3
To	Healthcare	From	B. J. Ginn		
Co./Dept.	District	Co.	Marin Audubon		
Phone #		Phone #	724-605		
Fax #	461-2094	Fax #			

4. To be adequate, a minimum of two trees should be planted for each native tree removed and trees removed should only be replaced with native oaks and other native tree species that are already growing on the property. The mitigation trees should be planted in open areas so that habitat is created, and they should be protected from future removal by an easement or other restrictive covenant.

↑
I-5
cont.

5. Potential impacts of light and glare from the increased lighting on wildlife, particularly, the endangered species in the marsh nearby, as well as woodland wildlife should be addressed.

I-6

6. The project proposes to discharge to a waterbody that has a beneficial use designation of "spawning, reproduction and development, migration or cold freshwater habitat." The DEIR concludes that the risk factor due to construction activities is "moderate." The DEIR should include a figure showing the discharge point and a description of the discharge area, i.e. current habitat. How the conclusion was reached that the risk factor would only be "moderate" is unclear and should be explained.

I-7

7. The project would result in an increase of 47 percent of impervious surfaces (page 4.H.18). The discussion should state the amount of increased runoff that would be expected to result from this increase in impervious surfaces.

I-8

8. To mitigate potential impacts of the construction-related and increased long-term runoff, the discussion on page 4-H-17 and 18 states that existing requirements (BMPs, NPDES, MCSTOPP Guidelines) and reporting to the RWRCB would be sufficient to address water quality impacts from both of these sources. Insufficient information is provided to support this conclusion. Lists of possible measures are included. There should be a discussion, informed by engineering studies, of what methods are recommended for use in the current circumstances.

I-9

9. Some of the proposed mitigation measures for long-term water quality impacts would themselves cause adverse impacts. These include the proposed biofiltration swales and infiltration basins. Where would these basins/swales be located, what size would they have to be and what are the vegetative characteristics of the areas where they would be constructed? Maintenance needs and responsibility for maintaining the basins/swales should also be addressed.

I-10

10. The Draft EIR identifies Alternative 2, Seismic Retrofit of the Existing Hospital Building as environmentally superior, because it would avoid removal of historical resources, portions of gardens designed by preeminent landscape architect Lawrence Halprin. Alternative 2 would remove an estimated 40 fewer trees. Where these trees are located and where the Halprin garden is located should be shown on a figure. Protecting this historic garden is certainly of cultural value, but it does not address loss of native habitat for native wildlife.

I-11

11. Of the current alternatives, Alternative 3 appears to be the most environmentally sensitive because there would be less construction. There should be an additional discussion - clarifying how much natural land would remain undeveloped with this alternative, how many trees would be protected in their natural setting would be protected, and by how much runoff volume would be reduced.

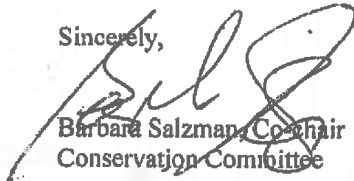
I-12

We also request that a new environmental alternative be developed, or that one of the existing alternatives be modified, that would reduce environmental impacts by both protecting existing undeveloped areas in a natural state and by reducing building coverage and habitat loss. Such an alternative would also reduce potential degradation of water quality.

I-13

Thank you for considering our comments

Sincerely,



Barbara Salzman, Co-chair
Conservation Committee



Phil Peterson, Co-chair
Conservation Committee

Letter I Response – Marin Audubon Society

- I-1: See the responses to the specific comments below.
- I-2: See Figure 4.C-2R in Chapter 3 (Changes to the Draft EIR) in this Final EIR, which is a detail tree inventory and plan, showing every existing tree in the construction area for the project and designating those proposed for removal, replacement, relocation onsite, or retention as is. The inventory listing of each tree and its characteristics is provided in Appendix C to this Final EIR. Also, the comment mistakenly indicates that the project will remove 230 native heritage sized trees; as indicated on Figure 4.C-2R (and originally on Draft EIR Figure 4.C-2, following Draft EIR page 4.C-32), the project will remove 143 trees protected under the County Code Section 22.130.030 for “Protected Tree and Heritage Trees.”
- I-3: See response to Comment I-2, regarding tree removal. Also, as discussed at various places in the Draft EIR, the project site is fully developed and landscaped, and remnants of the native grasslands and open oak woodland habitat types only persist on the steep slopes to the east and south of the developed areas. While native plant species persist to some degree on these steeper, undeveloped slopes, the remaining vegetation and habitat have been degraded through invasion of non-native plant species and vegetation management focused on fuel reduction. In particular, the habitat value of the woodland remnants on the slopes above the hospital has been degraded by invasive plant species colonization, vegetation management for fuel reduction, isolation and fragmentation, and surrounding land uses. That said, while the project will involve tree removal, the extent of removal, combined with the marginal, isolated habitat that does exist (surrounding by development) would not result in a significant impact.
- I-4: See response to Comment I-2.
- I-5: The commenter mis-states the Draft EIR analysis. First, the Draft EIR states that the project proposes the planting of approximately 264 trees and the relocation of 35 others onsite (159 would be retained in place), as described on Draft EIR page 4.C-31; these activities are not mitigation measures to reduce a significant impact, as a reader may misconstrue from the comment. Second, the Draft EIR identified the comprehensive Mitigation Measures BIO-6a through BIO-6d specifically to address the potential for the tree work necessary for the project to cause the spread of the pathogen that causes sudden oak death syndrome (SOD), which is identified as the significant impact. The proposed removal, replacement, relocation onsite, and retention of existing trees, with the introduction of the new landscaping of approximately 264 new tree plantings, was not identified in the Draft EIR to result in, or to mitigate, a significant impact.

As discussed in Chapter 2 (Project Clarifications and Additional Information), the project will add more trees to the oak woodland palette proposed in the Draft EIR to minimize adverse nighttime effects due to light and glare associated with the Hillside Parking

Structure. An additional 40 trees are proposed, for a total of 304 new tree plantings. See this revision to Section 4.C, *Biological Resources*, of the Draft EIR in Chapter 3 (Changes to the Draft EIR) of this Final EIR; revised landscape plans and tree counts are shown in revised Draft EIR Figure 3-14R, Landscape Concept Plan, and revised Draft EIR Figure 4.C-2R, Tree Inventory and Plan, in Chapter 3 (Changes to the Draft EIR) of this Final EIR.

The proposed plant list includes water-wise trees and shrubs/groundcovers, as defined by the Marin Municipal Water District (MMWD). The *Landscape Concept* described at the bottom of Draft EIR page 3-45 explains the overall intent to supplement appropriate areas of the site with native oak trees and grasses to reinforce an oak woodland vegetation mix. Ultimately, the final landscaping plan will adhere to the Marin County Native Tree Protection and Preservation Ordinance (see Draft EIR page 4.C-19), and will be reviewed as part of the County's Design Review of the project. Moreover, the project will provide replacement trees in accordance with the County Code Section 22.27.040 for "Replacement Requirements for a Permit Validly Obtained"; a replacement of 2:1 suggested by the commenter is not specifically required by the Code, and the County will review and determine the appropriate program for tree replacement, which the project has proposed in the Landscape Concept Plan (Draft EIR Figure 3-14, as modified in this Final EIR in Chapter 3 (Changes to the Draft EIR), and which the County will review during its Design Review of the project.

- I-6: The Draft EIR provides a comprehensive analysis of the potential effect of new lighting and glare on birds given the widespread effect of bird collisions and avian mortality due to new lighting under certain conditions - such as tall, transparent buildings like the proposed Hospital Replacement Building - being an attractant for migrating birds (see Impact BIO-2 on Draft EIR page 4.C-23). Overall, while the level of increased lighting resulting from the proposed new site development and specific buildings on the project site would increase light generated, those levels are not expected to cause a substantial change in lighting such that it would adversely affect special-status species in the area. The hospital is currently a 24-hour facility that is fully lit the entire night, including existing surface parking lot lighting that would be replaced with parking structures with carefully targeted lighting to avoid spillage, see Chapter 2 (Project Clarifications and Additional Information). The project is not anticipated to result in a significant impact to biological resources, namely special-status species as result of increased lighting that would occur.
- I-7: The risk factor would be "moderate" due to the fact that the storm drainage for the new site development would drain first into bio-retention areas where the storm drainage is treated through a natural filtration process and then piped down to the existing 60-inch storm drain in Bon Air Road. Further, the Marin Healthcare District or its contractor(s) would submit a NOI to the SWRCB's Division of Water Quality, develop a SWPPP, and implement site-specific BMPs in accordance with the SWPPP to control and reduce discharges of sediments and pollutants associated with construction and stormwater

runoff into downstream storm drains and water bodies, including Corte Madera Creek and the San Francisco Bay.

The existing water quality protection measures required of the applicant (e.g., implementation of BMPs, performance monitoring, and annual reporting to the SFBRWQCB) are sufficient to address potential construction-related water quality impacts that may result from project implementation. Erosion and sediment control measures designed for both during and after construction are integrated into the project grading and drainage plans and include inlet and biobag filter protection at all inlets and catch basins, fiber roll sediment barriers at the downhill side of all disturbed areas, and stabilized constructions exits. In addition, compliant with the RWQCB and Marin County Standards, grading operations would occur [*outside the rainy season*] between April 15 and October 15 and in accordance with an approved SWPPP for the project.

- I-8: See response to Comment D-18-r.
- I-9: See response to Comment D-18-a. Also see the discussion under *Storm Drainage and Erosion Control* on Draft EIR page 3-51, which is corrected (see response to Comment D-13-g) to reference new Figure 3-18, Stormwater Control Plan, in Section 3 (Changes to the Draft EIR) in this document. The Plan depicts the proposed stormwater management treatment features, primarily proposed vegetative swales and flow-through planters onsite.
- I-10: See new Figure 3-18, Stormwater Control Plan, in Section 3 (Changes to the Draft EIR) in this document. All features will be located on MGH property and thus maintained by the hospital. The District has elected to remove the bioswale element previously proposed in the ROW in response to County comments concerning private development proposed in the public roadway median, not due to the merits or lack thereof of the water quality elements. The commenter provides no evidence that such long-term water quality elements would cause adverse impacts to water quality for the project. These features are retained on the project site, as shown in new Figure 3-18.
- I-11: See Appendix F to the Draft EIR, which is the *Evaluation of Site Landscape Designed by Lawrence Halprin* – the historic resources evaluation report completed by SWA Group (2011) for the project, and informed by peer reviews by Denise Bradley (Bradley, 2011) and ESA (2011). This report includes extensive photos and plans of the historic garden and its conditions. The gardens and landscaping are also shown on Draft EIR Figure 3-4, which designates the area of the existing Halprin Gardens on the existing site conditions exhibit.
- I-12: Alternative 3 is discussed thoroughly, starting on Draft EIR page 5-24. Given its substantially reduced amount of development compared to the proposed project, the analysis discloses the comparative effects and site differences. The information presented is adequate pursuant to CEQA – which permits the discussion of the CEQA alternatives to be qualitative and less detailed than conducted for the project (see discussion under *Comparative Analysis of CEQA Alternatives* on Draft EIR page 5-5). Specifically, the

assessment presented provides the information necessary for the decision makers of the project to fully consider the adequacy and findings of the EIR and then decide matters of policy and design around the project's merits.

- I-13: Alternative 3 was formulated and included in the Draft EIR because, relative to the proposed project, it maintains undeveloped areas in a natural state, thereby reducing building coverage and habitat loss and potential impacts. Also see the discussion of the parking scenario if the proposed Hillside Parking Structure does not occur, under *No Land Swap / Full Project*, at the top of Draft EIR page 5-25. The range of alternatives presented in the Draft EIR represents a reasonable range of alternatives to the proposed project, as CEQA requires. No further alternative is provided.

October 19, 2012

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



Via email

Re: Marin General Hospital Draft EIR Completeness Comments

Dear Mr. Peluso,

Marin Conservation League has monitored land use and transportation issues in Marin County for more than 75 years. We are following the hospital’s replacement and expansion planning because the hospital generates significant vehicular traffic and uses large amounts of parking in a densely developed and highly congested area.

Our comments on the draft EIR are largely focused on the following areas: 1) inconsistent, unclear or incomplete information regarding the number of acute-care patient beds in use, the number of employees and the amount of parking, which are related to each other and determine most of the community impacts; 2) traffic and parking mitigation; 3) visual effect of bulk and mass, and 4) on-site renewable energy production and use in line with state and county policies mandating or encouraging a reduction in green-house gas emissions.

J-1

Project Overview, Description, p. 2-1

The last paragraph should also include as part of the proposed project the 74,986 square feet of space in the old wings that will be renovated for ancillary uses.

J-2

Patient Beds

The EIR overview says (p. 2-2) that the project “would not result in a net increase in the existing number of licensed beds on the project site.” This statement, through omission of clarifying detail, fails to correctly portray existing conditions and appears to be intentionally misleading. The existing situation, as we understand it from statements in Appendix B (p. B-9) is as follows:

J-3

Although the Marin General Hospital campus is licensed for 235 patient beds, due to state patient room requirements the hospital is currently limited to providing 148 beds for patient use, including a 17-bed psychiatric unit in the Marin Community Mental Health Building. An additional 59 beds will be in use by 2018 and 28 more beds added by project completion, about or before 2035. Thus, the number of beds in use on the campus will increase over existing conditions by about 59% at project completion. Of the 148 beds available, the average daily census, which is the number of beds occupied, is 126.



It is important to correct this project description as the number of patient beds is a crucial factor on which the hospital's employee and parking needs and estimated vehicle trips are based. As is noted in Chapter 4, (p. 4.M-26), Institute of Transportation Engineers (ITE) trip generation estimates for hospitals are based on the number of beds in use. Table 4.M-6 in the EIR and Table 8, (p B-46) show vehicle trips for 2018 and 2035 according to the number of new beds, as well as those generated by the Ambulatory Services Building, coming online.

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J-3
cont.

Patient beds are variously described in a number of places (e.g. EIR pages 3-8, 3-29, 3-40, 4.M-26; Appendix B pages B-9, B-43, B-45, B-46) and all these references should be consistent.

Table 3-1 (P. 3-37/38) is confusing in that it indicates (last column) that there are 235 total beds currently on the project site and this same number of beds throughout all the building phases. This table should be amended to indicate what the working number of beds is, currently and as the building phases proceed.

J-4

The EIR should also consistently include the 17 psychiatric beds licensed and in use in the various places where this subject appears so it is clear that the 17 are part of the 235 total.

Please also describe what constitutes a "nursing unit infill project" (p. 3.16, 3-40) and if or how it differs from other acute-care hospital beds.

J-5

Employees

The EIR states that the current 1,126 FTEs (full-time employees) will increase by 426 FTEs in 2035 for a full complement of 1,552 FTEs no later than 2035. This total, according to the EIR (Table 3-1), includes 286 FTEs in the Ambulatory Services Building and 140 that would be associated with the 28-bed "nursing infill unit" that is scheduled to be added in the south pavilion in the final phase of work which would end between 2025 and 2035.

J-6

There are two groups of employees that appear to have been omitted from this count: employees relocated from off-site, and any who will be added in association with the addition of the 59 new usable beds that occurs between 2012 and 2018.

Current Off-Site Employees. The EIR states (third bullet on p. 3-36) that 20,420 square feet of space in the central and east wings of the existing hospital would be re-used " by departments relocating from off-campus space at Drakes Landing currently leased by the Marin Healthcare District," but these employees do not appear in any of the FTE counts. The district also lists offices or labs off-site on South Eliseo, Bon Air Road and Mill Valley. Will any of these be relocated to the newly vacant space in the old wings?

J-7

FTEs Associated with New Beds. It is unrealistic to presume that the 59 new beds, to be added between 2012 and 2018, would not generate a need for additional medical personnel. The EIR estimate of 140 new employees to serve the 28-bed infill nursing unit represents about five employees per bed. Based on this the 59 beds added earlier would generate a need for almost 300 new employees.

J-8
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ITE methodology (p. B-46) estimates vehicle trips using their standard of 11.81 vehicle trips per bed per day, presumably a combination of employees and visitors. How is this number derived, e.g. how many of the trips are due to employees, visitors, other medical specialists, etc?

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J-8
cont.

Please explain this situation and modify as appropriate the estimates of new employees, and associated parking and vehicle trip numbers.

Table 3-1 (p. 3-37/38) also doesn't seem to fully include information on the central and east wings which remain on site. Please make sure the chart reports all the usable square footage and employee numbers for all phases, including full usage of all buildings on the campus.

J-9

Parking

Whether or not CEQA guidelines require that parking shortfalls should be considered a significant impact, provision of adequate on-site parking is important for the hospital's successful operation and should be conservatively calculated. As the EIR notes (p. 3-17) Marin General Hospital currently has substantial parking shortages. This has resulted in hospital employees and visitors using street parking that is intended for community use and the arrangement whereby the hospital also uses 90 spaces at nearby St. Sebastian's.

J-10

In the hospital's immediate vicinity there are several other institutions that require substantial parking, including Marin Catholic High School, the Bay Club and Hal Brown Park at Creekside. These are all valued community resources for which parking needs will, if anything, grow with time. The overall shortage of parking in this area underscores the need for Marin General to fully serve its own employees, patients and visitors on site. Parking needs at project completion should be based on the assumption that all the campus buildings, including the non-acute care services building, will be fully utilized. Moreover, parking estimates should include district employees, now located off-site, that will move to the expanded campus.

With regard to parking we are concerned about the EIR's statement that it would evaluate "if the project's estimated parking demand (both project-generated and project-displaced) would be met by the project's proposed parking supply or by the existing parking supply within a reasonable walking distance of the project site." Parking off site should be reserved for community uses such as the park, and all necessary hospital parking should be provided on-site.

J-11

Along with the analysis of hospital users and construction truck trips, please provide information on vehicle trips during construction due to workers not driving dump trucks and describe parking arrangements for these vehicles.

J-12

In summary it would be helpful if the EIR could include a chart itemizing, for 2012 and projected for 2018 and 2035, all locations used by the district, the number of employees at each location and the number of parking spaces currently used by the district at these locations. In addition it should include parking that is being used by the hospital employees and visitors on Bon Air Road (including the 2-hour parking on the west side of Bon Air which short-term visitors could use) on nearby residential streets such as Bayview, Tamalpais and Magnolia (where there is no time restriction on spaces between downtown and Bon Air Road); and at St. Sebastian's Church. It is not clear if the

J-13
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parking survey considered if any hospital users park on the nearby residential streets in overflow situations.

↑ J-13
| cont.

If St. Sebastian's is included in the project parking, provide in the EIR the lease that guarantees usage of those spaces for the hospital as long as the hospital remains in operation.

| J-14

The EIR should provide a plan for provision of all parking needs on the campus. If this means that the parking structures need to be enlarged it would be preferable if this is done without increasing the height due to community concerns about the buildings' bulk and mass.

| J-15

Traffic Mitigation

The EIR recommends a number of transportation demand management (TDM) strategies which the hospital could implement toward mitigating traffic impacts. The following information on employee travel is provided by an employee survey conducted by 511 Rideshare (Appendix B, p. B-32), and in data from the Conley Consulting Group that is in the EIR (p. 4.K-13):

- MGH employees have a relatively high 89% "drive alone" rate, in contrast to Marin County commuters' overall drive alone ratio of 75-80%.
- MGH employees commute distances averaging a relatively long 19.2 miles, although about 40 % live within 10 miles of the hospital.
- Employees believe carpools and vanpools would be attractive alternatives for commuting.
- 46% of employees live in Marin and 54% thus live outside the county.
- Transit use is very low, and available transit schedules and routes are not well suited for MGH employee commuting.

Given that the project would ultimately have more than 1,500 FTEs commuting to and from work at one location, we believe the district can implement a more robust program than the EIR proposes to reduce employee vehicle trips and parking needs.

| J-16

The long commute and high percentage living outside the county means that, based on an 89 % solo driving pattern, about 750 MGH or district employees travel, probably from Sonoma County or the East Bay, on Highway 101, Sir Francis Drake Blvd and nearby streets. Given the severe congestion on 101 and local arterials at peak hours the district should take every step possible to reduce this impact, even if it does still remain significant.

The EIR should provide information on how a program of dedicated vans, buses or other vehicles to transport employees to and from work could be implemented. This should include a summary of where current employees live – by extension future employees are likely to fall into a similar county of residence pattern – as well as shift times.

A local shuttle could serve employees who live within 10 miles of the hospital. There may also be a large enough number of employees from urban areas like Santa Rosa to justify buses or vans which have pick-up stops at regular locations and times coordinated with the hospital's shift times. Carpools may be a realistic solution for employees who live in less densely populated areas.

Table 4-1 does not seem to include the WinCup redevelopment on Tamal Vista Blvd. in Corte Madera for up to 180 apartment units and 3,000 square feet of commercial uses.

J-17

Visual Impact

The project would grow the campus from its existing 308, 152 square feet to an eventual size of 677, 086 square feet (Appendix A, pages A-8/9), more than doubling the building mass on the campus. The increased size will be highly visible from adjacent neighborhoods and the Hal Brown Park at Creekside and the district should make efforts to reduce the impact.

J-18

In addition to the environmentally preferable alternative described, it is possible that a modified building configuration would help reduce the perception of bulk and mass from Bon Air Road and the park. Please provide a CEQA alternative analysis of non-CEQA design alternative C (EIR p 5-42/44) as a possible mitigation to visual impacts. This could break up the long surface of the garage by bringing the Ambulatory Services Building (ASB), which could have a more interesting and articulated facade than the garage, to front on Bon Air Road.

J-19

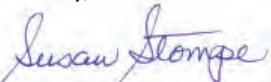
Greenhouse Gas/Energy

The district has overlooked an opportunity to comply with state legislation and countywide plan policies seeking to reduce greenhouse gas emissions by not planning for solar panels on all rooftops. Please describe a plan for solar installations atop all the campus buildings, including calculations on how this would reduce energy needs for the hospital.

J-20

Thank you for this opportunity to comment. We look forward to a successful project.

Yours truly,



Susan Stompe, President

cc: Supervisor Katie Rice
County Planner Jeremy Tejriran

Letter J Response – Marin Conservation League

- J-1: See the responses to the specific comments below.
- J-2: See response to Comment H-1.
- J-3: see response to Comment H-17.
- J-4: See response to Comments H-2 and H-3. A thorough review of the Draft EIR confirms that it is consistently clear that the 17 beds in the Marin Mental Health Building are *included* in the total 235 licensed beds at MGH. This is shown tabular in Table 3-1 on Draft EIR pages 3-47 and 3-48 (as modified in response to Comment H-3)
- J-5: The Nursing Unit Infill Project does not differ from the other acute-care hospital beds in the hospital. The project is referred to as “infill” only because it will be developed at a later phase of the project and within the new Hospital Replacement Building when needed.
- J-6: Regarding employees associated with proposed project phasing (i.e., those associated with the addition of 59 usable beds that occurs between 2012-2018), please refer to response to Comment H-17. With regard to off-site employees relocating to on-campus, 20,420 square feet of office uses (currently off site), see response to Comment H-6.
- J-7: See response to Comment H-6.
- J-8: See response to Comment H-17. ITE methodology develops trip generation for specific land uses based on observed data samples. Based on empirical data compiled for hospital uses, ITE developed an overall trip rate for all operations of a hospital, represented by a division of the number of patient beds; the trip rate is not disaggregated among visitors, employees, etc., but reflects total trips.
- J-9: See response to Comment H-8.
- J-10: It is acknowledged that adjacent off-site uses not related to the proposed project (Bay Club, Marin Catholic High School, and Hal Brown Park at Creekside) will put pressure on off-site parking along Bon Air Road, especially if they are not required to provide enough on-site parking as part of any new permitting. As described in the Draft EIR, under the most conservative conditions, the proposed MGH Replacement project would have an overall peak parking demand of 1,183 spaces (as revised in this Final EIR). Based on a projected on-site supply of 1,079 spaces, including the proposed onsite Hillside and Bon Air parking structures, there would be an overall deficit of 104 parking spaces (as also revised in this Final EIR). In order to avoid a potential parking shortfall and to not put excess demand on existing off-site parking along Bon Air Road, the project applicant has secured a long-term shared parking agreement with the St. Sebastian’s Church located just northwest of the campus off Bon Air Road. The long-term agreement

secures 90 parking spaces until 2021 for employee use, which would reduce the parking deficit at 2035 to 14. The church parking lot will continue to be served by MGH campus shuttle services. By obtaining the long-term parking agreement with St. Sebastian's Church, overall peak project parking demand would be accommodated. The Draft EIR acknowledges that there is no guarantee that the church spaces will be available after Year 2021, which would cause a 104-space deficit. However, even so, with an existing 128 spaces deficit, even without the 90 church spaces, the hospital would have a lower deficit and cause fewer parking availability issues in surrounding neighborhoods (as discussed on Draft EIR page 4.M-57, as revised in this Final EIR).

Also see the second paragraph of response to Comment H-19 regarding the recent execution of a new lease agreement extension to 2021.

- J-11: Please see response to Comment J-10 regarding the fact that all off-site parking spaces would be at St. Sebastian's Church within a reasonable walking distance and served by MGH shuttle services.
- J-12: Please refer to response to Comment D-24 regarding impacts during project construction, and the construction management plan the project applicant will prepare, and to response to Comment D-13-i regarding off-site contractor parking.
- J-13: Parking analyses conducted for the proposed project were based on previous parking studies conducted for Marin General Hospital (*Wilbur Smith Associates, Marin General Hospital Parking Study, Final Report, April 19, 2010*) and employee/use data provided by the project applicant. Existing MGH site information regarding parking lot locations, use, occupancy, and demand can be found in the Wilbur Smith Associates study (which is in the references record for the Draft EIR, available at the Marin Healthcare District's offices). No off-site parking along Bon Air Road or adjacent residential streets were included in the overall project supply, nor was it included in future project-related use calculations for short-term and long-term parking demand. Overall on-site parking can be used by both employees and visitors and is not precluded for either use.
- J-14: See response to Comment H-19.
- J-15: See response to Comment H-26.
- J-16: See responses to Comments D-23 and E-3.

Also, using the Marin General Hospital Transportation Survey Results report developed for the project, TDM measures were recommended for both employees and visitors. The TDM plan was also reviewed by Marin County Transportation staff (who made additional recommendations to the plan). Suggested TDM measures from the Marin Conservation League would be considered as part of any ongoing TDM plan for the proposed project.

- See response to Comment H-22 specifically regarding vanpools and carpools.
- J-17: See response to Comment D-14 regarding the process by which the cumulative list in Draft EIR Table 4-1 was developed and vetted through coordination with the County. That process did not result in the WinCup project being identified as a reasonably foreseeable project as of January 1, 2010 for incorporation into the cumulative project list for this EIR. It is possible that the project could already be included in the growth reflected in the TAM travel demand model projections, which factor in local land use designations. Regardless, the location of the project is approximately two miles east of Marin General Hospital on Tamal Vista Boulevard, which runs parallel to and about 500 feet west of Highway 101. Given this distance, the potential effects from that development are not expected to combine with the effects of the proposed project to cause a cumulative effect for most topics.
- J-18: The Draft EIR conducts a comprehensive visual analysis of the project in the Aesthetics section of the Draft EIR, and further in Chapter 2 (Project Clarifications and Additional Information). Appropriate mitigation measures and project elements are identified to reduce potential impacts. In particular, Impact AES-1 on Draft EIR page 4.A-27 addresses the effort to “break” up Hospital Replacement Building’s west facing facade, as seen from the Corte Madera Creek pathway looking east. Simulations are provided in Draft EIR Figures 4.A-7 through 4.A-9 from the pedestrian paths along the creek. The effect is reduced to less than significant. Also see response to Comment H-12.
- J-19: See responses to Comment H-10 and J-18.
- J-20: See response to Comment H-32.

Comment Letter K

From: James [<mailto:jamesgunther9@gmail.com>]
Sent: Thursday, September 20, 2012 5:04 PM
To: Ron Peluso
Subject: Construction

Message Body:

Will the replacement hospital be constructed under a Project Labor Agreement utilizing strictly Union labor or, can an Open Shop (Non-Union) Contractor be allowed to work on the project?] K-1

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<http://marinhealthcare.org>

Letter K Responses – James Gunter

K-1: The comment does not address the adequacy of the Draft EIR or the potential environmental effects of the project considered under CEQA. The comment is noted. The District will consider the comment, as appropriate, for non-CEQA aspects of the project.

Comment Letter L

From: noreen kennedy [<mailto:noreen2045@yahoo.com>]
Sent: Thursday, October 04, 2012 8:01 PM
To: Ron Peluso
Subject: New Hospital...

Message Body:

How is this all being paid for. We are being taxed and taxed with Bonds, Parcel Taxes, etc., etc., I'm a Kaiser Patient and it won't benefit me or my family.
Sincerely, Noreen Kennedy

L-13

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Letter L Responses – Noreen Kennedy

- L-1: The comment does not address the adequacy of the Draft EIR or potential environmental effects of the project considered under CEQA. The comment is noted. The District will consider the comment, as appropriate, for non-CEQA aspects of the project.

Comment Letter M

From: Theresa Ward [\[mailto:theresa.ward24@sbcglobal.net\]](mailto:theresa.ward24@sbcglobal.net)
Sent: Thursday, October 11, 2012 9:27 PM
To: ron.pelusa@navigantconsulting.com
Cc: cbrown@esassoc.com; barbara.b1@sbcglobal.net; Anne Petersen
Subject: Marin General Hospital EIR: Simulation of Hillside Structure

Dear Ron,

I am a property owner at Spyglass Hill, behind MGH. I attended the EIR meeting tonight and I've subsequently reviewed the MGH Replacement Building Project Draft. Figure 4.A-12 does not depict the hillside parking structure proposed on the hillside behind MGH. I've not noted it in any other of the figures either. This structure, if as verbally proposed, could be a significant detriment to the hillside residents both in terms of noise and pollution, in addition to local traffic and ultimately on our property value.

M-1

Please advise.

Thank you very much.

Sincerely,
Theresa Ward, RN
Spyglass Hill Property Owner's Association

Letter M Response – Theresa Ward

M-1: Chapter 2 (Project Clarifications and Additional Information) of this Final EIR includes a visual assessment of the potential aesthetics effects of the proposed Hillside Parking Structure on residential areas uphill to the northeast and east of the proposed project, specifically the Spyglass Hill and Via Hidalgo residential complexes. The assessment in Chapter 2 includes a series of photos and visual simulations from these hillside residential areas looking toward the project site, specifically the Hillside Parking Structure; see Figures 2-11 through 2-15. Chapter 2 also includes a series of exhibits that clarify the dimensions and setbacks of all the proposed project buildings (Figures 2-1 through 2-9).

The Draft EIR analyzed the potential effects of noise and pollution (air quality) on nearby residents, both during project construction (demolition, grading and building erection) and operation. Each is discussed below.

Construction Noise. The discussion of construction noise effects specific to the hillside residential areas starts in the first paragraph on page 4.J-17 of the Noise and Vibration section of the Draft EIR. Findings by construction phase/building are summarized in Table 4.J-9 on Draft EIR page 4.J-18, a portion of which is updated for this Final EIR, as shown below. As updated to specify distance to the edge of construction versus structures, The table continues to show that the residential areas located closest to the project site would not experience noise levels during construction of the project (and specifically during construction of the Hillside Parking Structure, which is located closest to the residential areas) that would exceed the range of existing hourly average noise levels in these areas. However, the Draft EIR identified the impact as significant, even with implementation of Mitigation Measure NOI-2 (which starts on Draft EIR page 4.J-19) given the lengthy duration of the overall project construction during which associated noise- could exceed 60 dBA Leq and the ambient noise environment by at least 5.0 dBA Leq and particularly affect patients in the hospital.

The following section of Draft EIR Table 4.J-9 is corrected as follows:

**TABLE 4.J-9
RANGE OF CONSTRUCTION RELATED NOISE LEVELS BY PHASE (DBA, L_{EQ})**

Construction Phase	Location of Activity (Duration)	Receiver - Distance to Construction	Range of Hourly Average Noise Levels at Nearby Receivers
I	Hillside Parking Structure (2012-2013)	Source Level – 50 feet	71-89
		Via Hidalgo – 200 100 feet	59-77 65-83
		Spyglass Hill – 300 200 feet	55-73 59-77
		Corte Oriental – 400 300 feet	53-71 55-73
		Bayview Road – 900 feet (Shielded by Buildings – 10 dBA reduction)	36-54
		Harvard Drive – 1,500 feet (Shielded by Buildings – 10 dBA reduction)	31-49
		Berens Drive – 1,750 feet	40-58
		Marin Catholic High School - 1,150 feet	44-62

As a result of the correction shown in Table 4.J-9 above, the second sentence of the first paragraph on Draft EIR page 4.J-17 is modified as follows:

Residential uses north, east and south of the site along Via Hidalgo, Spyglass Hill, Corte Oriental, and Bayview Road, conservatively would be as close as ~~200-100~~ feet from major construction activities.

Operational Noise. The potential effect of noise from the Hillside Parking Structure after it is constructed is discussed starting in the fourth paragraph on Draft EIR page 4.J-24, as revised below. As revised to address distances between receptors and actual operations/parking structures, the analysis still finds that, given the type and levels of noise associated with the parking garage (car horns, vehicle passbys, door slams, engine starts), the noise levels would not exceed Marin County's daytime and nighttime noise limits for maximum instantaneous noise levels, and therefore would be less than significant. The analysis specifically targets the nearby residential areas of Via Hidalgo, Spyglass Hill and Corte Oriental.

The first sentence of the fourth paragraph on Draft EIR page 4.J-24 is modified as follows:

Multi-family residences along Via Hidalgo are located approximately ~~100-180~~ feet northeast of the proposed Hillside Parking Structure and would have direct line-of-sight to parking activities on the top level.

The first sentence of the fourth paragraph on Draft EIR page 4.J-24 is modified as follows:

Residences to the southeast (Spyglass Hill) and south (Corte Oriental) are located ~~280-245~~ to 400 feet, respectively, from the Hillside Parking Structure. At a distance of ~~280-245~~ feet from the Hillside Parking Structure, maximum instantaneous noise levels would typically range from ~~42-47~~ 43-48 dBA Lmax. The sounding of the car horn near the edge of the parking structure would yield noise levels ranging from ~~51-59~~ 52-60 dBA Lmax.

Construction and Operational Air Quality. The Draft EIR specifically considered the residences closest to the construction activity in its analysis of construction emissions (starting on the last paragraph on Draft EIR page 4.B-14, under Impact AIR-2), construction dust (starting on Draft EIR page 4.B-19, under Impact AIR-3), and operational emissions/vehicle exhaust (starting in the last paragraph on Draft EIR page 4.B-23, under Impact AIR-5 and summarized in Draft EIR Table 4.B-9 on page 4.B-24). Mitigation measures are identified for each of these impacts, which would reduce the respective impacts for each to less than significant. The analysis in this Final EIR considers the aforementioned corrected distances between the nearest residences and the Hillside Parking Structure and the construction area. These changes do not change any of the air quality conclusions reported in the Draft EIR.

Under Impact AIR-3 on Draft EIR page 4.B-19, the fifth sentence in the first paragraph is modified as follows:

Closest residences would be about 100 feet (Via Hidalgo) and 200 feet (Spyglass Hill) from the nearest grading activities (associated with the Hillside Parking Structure); however, most construction activity would occur at distances greater than ~~200~~100 feet.

The Hillside Parking Structure would not affect local traffic, as it is not a trip generator.

The extent to which the proposed project could adversely affect private property values is not an environmental consideration under CEQA. The comment is noted, and the District will consider it, as appropriate, for non-CEQA aspects of the project.

Comment Letter N

From: Carol Nelson [<mailto:calmcats4@comcast.net>]
Sent: Wednesday, October 17, 2012 6:38 PM
To: Ron Peluso
Subject: LEED status

Message Body:

I would like to know if it is feasible to design the hospital to meet Platinum LEED status as opposed to Silver LEED status. Would it be cost effective in the long run to comply with the requirements for Platinum status? How much would the carbon footprint be impacted by going for Platinum status? N-1

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Letter N Response – Carol Nelson

N-1: The District has established a project goal of sustainable design that achieves a rating equivalent to LEED⁵ Silver certification and the LEED for Healthcare Rating System modeled after Green Guide for Healthcare (GGHC) Green Building standards that would reduce energy-related GHG emissions from the project (see Draft EIR page 3-15, *Objectives of Proposed Project*). As plans for the Hospital Replacement Building and Ambulatory Services Building continue to be refined for final building design and engineering, the District continues to evaluate the particular green building status that is the highest and most practical and effective for the hospital to attain while balancing several factors, including cost effectiveness.

CEQA evaluates a project's GHG emissions as a practical representation of a project's "carbon footprint". Relevant to the environmental analysis, and as discussed under *Energy Usage* on Draft EIR page 4.F-11, the Hospital Replacement Building LEED score sheet targets the optimal energy performance as 30 percent better than Business As Usual (assumed to be year 2008 Title 24 Building Code requirements). The Draft EIR lists at the bottom of Draft EIR page 4.F-11 some of the energy efficient features proposed to meet a minimum LEED Silver certification or equivalent and best practices of the GGHC. The project analysis in the Draft EIR conservatively assumed only a 10 percent reduction in emissions associated with energy consumption assuming these energy efficient features. Therefore, in actuality, the GHG emissions (or carbon footprint proxy) will be less than reported in the Draft EIR, even before implementation of mitigation measures specified in Mitigation Measure GHG-2 aimed at reducing single occupancy vehicle use (as revised in the Comment D-23 response) and waste reduction (as shown on Draft EIR page 4.F-16).

⁵ U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) rating system.

Comment Letter O

From: Alex Stadtner [<mailto:alex@healthybuildingscience.com>]
Sent: Thursday, October 18, 2012 11:53 AM
To: Ron Peluso
Subject: Recommend considering EMF/EMR during design.

Message Body:

Greetings,

I used to work for GBS out of Portland and worked on many LEED projects and a few GGHC ones too! Now we live in Marin. LEED and GGHC don't have any credits about water quality (testing/filtration) or electromagnetic fields (EMF). I strongly suggest the team evaluate the site and implement best practices for each of these known contaminants pathways. Happy to help if you need additional expertise, especially in the EMF scope. There are loads of people here in Marin very concerned about EMF... and the Smart Meter issues is just the tip of the iceberg. It would be great if Marin General could demonstrate itself a leader in the sustainable/health field by building a building that would be comfortable for all Mariners!

O-1

Sincerely,

Alex Stadtner

www.HealthyBuildingScience.com

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<http://marinhealthcare.org>

Letter O Responses – Alex Stadtner

O-1: The Draft EIR discussed known hazards associated with the construction and operation of the proposed project. Electromagnetic Fields (EMFs) are described on Draft EIR page 4.G-4 in the Hazards and Hazardous Materials section, and the potential environmental effect with the proposed project is discussed on Draft EIR page 4.G-22. To summarize from that discussion, EMFs are reduced by standard building practices, and the project's adherence to, and compliance with, existing regulatory mechanisms (regulations, codes and standards) established at the state and federal level (see response to Comment D-18-a) are expected to ensure that the project will not result in significant adverse effects to human health or the environment under CEQA. Further, no aspect of the proposed buildings or their operations would substantially increase EMFs to levels that would harm employees or patients. The risk of public hazards caused by EMFs associated with the proposed project would be less than significant. Similarly, to the extent the proposed project would result in an adverse effect to water quality by emitting contaminants directly or indirectly and result in a significant impact, continued adherence to, and compliance with, existing local, state and federal regulatory mechanisms related to Hydrology and Water Quality, as discussed starting on Draft EIR page 4.H-16, would also ensure that the project would not result in a significant CEQA impact.

The District notes the commenter's offer of additional expertise regarding best practices regarding EMF evaluation.

Comment Letter P

From: Gail Napell [<mailto:woodbinestudio@pacbell.net>]
Sent: Monday, October 22, 2012 1:08 AM
To: Ron Peluso
Subject: EIR

Message Body:

Impact BIO-7 states no cumulative effect on wetlands. This does not take into account the BCDC projected sea level rise for the area. There is no guarantee that the wetlands will rise along with sea level but that is a distinct possibility.

Impact GHG does not mention any aspects of Climate Change other than GHG emissions. Climate Change impacts in the Bay Area include sea level rise, increased temperature extremes, increased water uncertainty (storms, flooding, drought), increased energy uncertainty, and increased wildland - urban interface fires. (Please reference BCDC's most current reports on the impacts of sea level rise in the Bay Area, and SPUR's May 2011 report 'Climate Change Hits Home' for anticipated effects.) While the construction of this project may not change these impacts, it must respond to them. The EIR fails to recognize them at all, and in fact denies any issues with sea level rise (see HYD-4 through 6)

P-1

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Letter P Responses – Gail Napell

P-1: The analysis of cumulative impacts to biological resources considers the potential effects of the proposed project combined with the effect of other cumulative development (identified on Draft EIR page 4-5). Specifically the analysis that starts on Draft EIR page 4.C-35 considered the combined effect during construction and operation of the project and other cumulative development that could potentially affect stormwater discharge, runoff, and water quality that could adversely affect wetlands. The potential effect of sea-level rise on wetlands near the project is not a direct consideration that concerns the effects of the project on the environment under CEQA. However, the potential for flooding and the extent of inundation are recognized (Draft EIR Figures 4.H-1 through 4.H-3, respectively) and underlay the project analysis in Impacts HYD-1 throughout in the Hydrology and Water Quality section of the Draft EIR. To the extent that the project contributes to sea-level rise, that is addressed in the Greenhouse Gases and Climate Change section of the Draft EIR.

The *Environmental Setting* and *Regulatory Setting* of the Greenhouse Gases and Climate Change section of the Draft EIR introduce the global climate change phenomenon (Draft EIR pages 4.F-1 through 4.F-7). While that discussion largely focuses on GHG emissions (since that is the measure of the project's contribution to climate change addressed in that section of the Draft EIR), it also recognizes "rises in sea level" and other effects and conditions that can be expected in California: diminishing snowpack, which pertains to reduced water supply (addressed in the Utilities and Service Systems section of the Draft EIR); increasing temperatures, which pertains to ozone pollution (related to the Air Quality section of the Draft EIR); coastal erosion and flooding (addressed in the Geology, Soils, and Seismicity and the Hydrology and Water Quality sections of the Draft EIR); increased vulnerability of forests and agriculture (which is embodied in Greenhouse Gases and Climate Change section of the Draft EIR); and increased electricity demand (also embodied in the Greenhouse Gases and Climate Change section and the Utilities and Service Systems section of the Draft EIR).

CHAPTER 6

Responses to Comments Made at the Public Meeting on the Draft EIR

The Marin Healthcare District held a public meeting on the Draft EIR on October 11, 2012, at the Marin General Hospital Conference Center. This chapter presents the public comments made at the public meeting, with the responses to each speaker's comments immediately following each comment. All comments (and responses) made at the public meetings are shown in *italics* type; responses prepared for this Final EIR are shown in plain text. To avoid redundancy within this document, responses refer the reader to responses previously provided in Chapter 5 (Response to Written Comments Received on the Draft EIR) wherever appropriate.

The public comments have been hand-transcribed from a digital audio recording prepared by the Marin Healthcare District; instances where the speaker's comments were inaudible on the audio recording are noted, and these omissions are not considered to substantially impair the District's ability to adequately respond to the overall comment provided. The recording of the entire Public Meeting, which includes discussions not pertinent to the Public Comment Period within the meeting, is available for review at the Marin Healthcare District Offices.

Where District representative or its consultants responded to comments during the public meeting, those responses are included and shown in italics, followed by the final response prepared for this Final EIR document.

Written comments were also submitted at the Public Meeting and appear in this chapter, Hand-written notes that a public commenter submitted with their Speaker Card during the public meeting are also provided following the transcript, in Section 6.2, followed by the responses to each speaker's comments. Section 6.3 includes comments made by District consultants regarding comment submittal logistics.

6.1 Responses to Comments Received at the Public Meeting on the Draft EIR

Paul and Margie Taylor, Neighbors:

PM-1: *Good evening. So the bottom right of the map is our street. [Inaudible 21:12 to 21:15] We're at 55 Tamalpais Road. Our concern is basically with traffic, and I called the County recently about suggesting crosswalks. They just never answered and maybe you people can answer that or maybe it is already being looked at. It seems to me that one crosswalk should be at the emergency entrance and another one somewhere near the park or all the way down at the other entrance.*

PM-1 RESPONSE:

See response to Comment D-13-e in Chapter 5.

PM-2: *We are concerned that they increase traffic with 700 parking spaces being proposed, I'm not sure why it's 700 but, did I read somewhere that there is no increase in beds? But we need lots of parking, we need more.*

PM-2 RESPONSE:

Ron Peluso (Consultant): *Yes.*

Final EIR Response Supplement: In professional practice, parking spaces, in and of themselves, are not considered to generate vehicle traffic. The best description of the current parking spaces and the sources for determining the existing parking demand and parking demand rate (spaces per employee) can be found on Draft EIR pages 4.M-16 to 4.M-18. Also see response to Comment H-19 in Chapter 5.

PM-3: *Another traffic issue, is when we turn left on this relatively unknown road called Bay View Road, the markings are poor. Now that's maybe not hospital that's county responsibility, but one of our neighbors, and I don't think she's here tonight, had \$12,000 damage done. And I don't know anything about the details, but she was turning left, and it's problematic when you're coming by the hospital and then turning left onto Bay View, people don't expect turning left there, they expect you to turn left at the light. So the markings on the road need to be improved. And now again that's probably not hospital business, our major concern is traffic increases, and the crosswalks.*

PM-3 RESPONSE:

The commenter is correct that the roadway striping on Bon Air Road at Bay View Road (south of MGH Main South Driveway) is not the responsibility of MGH and is maintained by the County of Marin/City of Larkspur. It is noted, however, that as stated on page 4.M-35 of the Draft EIR, roadway improvements, as part of the proposed project, would include installation of an interim left-turn refuge lane on Bon Air Road for outbound driveway traffic at the MGH Main South Driveway, to improve overall intersection access and level-of-service. The interim improvement would be removed on Bon Air Road, and a signal would be installed based on the weekday p.m. peak-hour warrant satisfaction (estimated to occur under Cumulative Year 2023 “Plus-Project” Conditions). The interim refuge lane would provide drivers wishing to turn left onto Bay View Road with the ability to wait to complete the turn without impeding through traffic. Also, the design for the signal installation could include pavement markings that extend south, past Bay View Road, transitioning into the left-turn lane at South Eliseo Drive, to improve access at Bay View Road as a combined MGH/County improvement.

PM-4: *Now another thing, I don't anything about helicopters, and you're not talking about that tonight.*

PM-4 RESPONSE:

The proposed project does not involve changes to existing helicopter operations or related facilities, as specified on Draft EIR page 3-8. Also see response to Comment PM-12.

PM-5: *So, another issue we've seen happen is the one-way exit on 1350, which is hospital property, correct? 1350 Eliseo?*

PM-5 RESPONSE:

John Friedenber (District): *The hospital has a master lease on that property, it's owned by the prior operator, the hospital, but the hospital has the master lease on that property, and that is where the hospital cancer center is.*

Final EIR Response Supplement: The hospital cancer center is one of the existing offsite hospital activities that would relocate to the proposed Administrative Services Building with the project.

PM-6: *In that case, again this is off topic, I suppose, but we see people going in through that exit, which is a one way exit onto [inaudible 23:23]. And again, not sure responsibility, but that's happened and it's another cause of concern. So, that's about it. So we have a street that many people aren't aware of, and they use Tamalpais Road" [inaudible 23:35 to 23:42]. I'm really interested in crosswalks. I use the park, and I jay walk because I don't want to walk an extra half a mile to go all the way to Eliseo or to Sir Frances Drake, so that's about it for me.*

PM-6 RESPONSE:

Ed Shaffer (Consultant/Counsel): *To ease your mind, crosswalks are planned as part of the project.*

Ron Peluso (Consultant): *We know there's going to be the one, we don't know about the second one on the southern, on the south side, and again...*

Final EIR Response Supplement: See response to Comment D-13-e in Chapter 5.

Unidentified Female Speaker

PM-7: *The one [crosswalk] is on South Eliseo for sure, and the second would be the proposed one?*

PM-7 RESPONSE:

See response to Comment D-13-e in Chapter 5.

Theresa Ward, Spyglass Hill Property Owners Association

PM-8: *Good evening. Thank you for being here for us tonight; it's a very busy night. I am from Spyglass Hill, and, uh, I've been looking at the maps and so forth and I first want to say thank you very much, I know about the mandate and I work for UCSF, I understand mandates. Would you please help me understand, is this considered the parking structure right here? [The commenter identified the proposed Bon Air Parking Structure on the project site plan.]*

PM-8 RESPONSE:

Ron Peluso (Consultant): *Yes, that's parking.*

PM-9: *How high up will this structure be?* [The commenter identified the proposed Hillside Parking Structure on the project site plan.]

PM-9 RESPONSE:

Ron Peluso (Consultant): *It is five decks tall, five stories tall, and it comes above the hilltop approximately two stories.*

Final EIR Response Supplement: The Hillside Parking Structure is proposed to contain six stories of parking above ground. The highest top of the parapet points will range from 61 feet-8 inches to 62 feet-8 inches above existing grade. Maximum height to the top of the mechanical penthouses is 70 feet.

Starting on page 2-12 of this Final EIR, see the detailed updated description, section (Figure 2-8) and plan (Figure 2-9) that update and clarify the dimensions and setbacks of the Hillside Parking Structure in Chapter 2 (*Project Clarifications and Additional Information*). Section 2 also includes a series of photos and visual simulations of the Hillside Parking Structure, as viewed from the nearby hillside residential area to the site (Figures 2-11 through 2-15).

PM-10: *Two stories, I got it, in terms of relationship to that, that's a major issue [inaudible 26:00].*

PM-10 RESPONSE:

Ed Shaffer (Consultant/Counsel): *The EIR contains some simulations from different viewpoints including at the top of the hill looking down of what the buildings will look like, and you should look at the aesthetics section of the EIR, to give you a feel for it. And then if you want to submit written comments afterwards, you're free to do that.*

Final EIR Response Supplement: See Figures 2-11 through 2-15 in Chapter 2 (*Project Clarifications and Additional Information*) of this Final EIR, which are photos and visual simulations of the proposed Hillside Parking Structure as viewed from residential areas uphill to the northeast and east of the project site.

PM-11: *Definitely will do that, sir, and of course my comments [inaudible 26:31 to 26:35] on that. Thank you very much.*

PM-11 RESPONSE:

The comment is noted.

Darin Huard, REACH Air Ambulance

PM-12: *I'm one of the general managers for Reach Air Medical Services. We are one of the two helicopter providers here in this area, and in looking at the Environmental Impact Study we didn't see the helipad was planned. So our question is why not? Most hospitals have helipads and to us it would kind of make sense to help move patients in and out of these areas, to put a state of the art helipad with a state of the art hospital. We currently land in the park across the street, but it is not ideal. There's a, we're accredited by CAMTS [Commission on Accreditation of Medical Transport Systems] and the FAA. They're coming down pretty strict on helipads, so there could be a time when we're not allowed to land in an area like that for something that is not an emergency, so I guess my question is has that been talked about to have a helipad here? If so, why not?*

PM-12 RESPONSE:

John Friedenberg (District): *I've just been advised by counsel that if I start answering questions we're going to be here past midnight, but I'll just say that you're correct, it's not part of this plan and any future proposal to have a helipad would require a completely separate permitting and EIR process. So it isn't part of it, but I'd be happy to talk with you afterwards and explain why it's not part of this process. It's awkward for me because my inclination is to answer all of your questions, but I guess we don't have time, but I am happy to do it afterwards.*

Anne Petersen, Kentfield Planning Advisory Board

PM-13: *I chair the Kentfield Planning Advisory Board. Marin General Hospital is in the unincorporated area of Marin County, and is bordered by Larkspur but is in the Kentfield jurisdiction of our planning board, which is an appointed board by Board of Supervisors.*

We have reviewed the EIR to the best of our ability, which is a very lengthy document and there are lots of appendices, which are important. We are very concerned about traffic...

PM-13 RESPONSE:

The commenter is not specific about the concerns held about traffic. Traffic flow needs during operation of the project are thoroughly discussed throughout the *Transportation and Circulation* section of the Draft EIR, specifically in Impacts TRA-1 through TRA-3, TRA-5 and TRA-7. Traffic flow needs during construction are addressed in Impact TRA-6, which starts on Draft EIR page 4.M-45.

PM-14: *[We are very concerned about] having adequate parking for the full facility on-site rather than using outside sources for parking.*

PM-14 RESPONSE:

See responses to Comments H-19, H-26 and J-10 in Chapter 5.

PM-15: *We're concerned about minimizing the use of, figuring out how to use less electricity and using other sources for power.*

PM-15 RESPONSE:

See response to Comment N-1 (in Chapter 5) regarding the project's goals for energy use reduction. Also, Marin Healthcare District has committed to design and operational characteristics for the project, which align with LEED® Silver certification and the LEED® for Healthcare Rating System modeled after GGHC, and are discussed under Sustainability Elements, starting on Draft EIR page 3-42. Also see response to Comment H-32 in Chapter 5.

PM-16: *[We're concerned about] protecting the ability to access Hal Brown Park and our other recreation facilities in the area.*

PM-16 RESPONSE:

See response to Comment D-13-e in Chapter 5.

PM-17: *Make sure there's adequate parking on the street for people wanting to use those facilities.*

PM-17 RESPONSE:

See response to Comment D-13-f in Chapter 5.

PM-18: *We are in the midst of preparing a lengthy document to submit to you in time for the closing of the EIR evaluation process and plan to do so. Thank you very much.*

PM-18 RESPONSE:

The comment is noted. See Letter H from the Kentfield Planning Advisory Board in Chapter 5 of this Final EIR.

Melissa Panages, Neighbor

PM-19: *I was over, I'm a long time resident, grew up in Marin, and have used Marin General my whole life. I wanted to say one thing, how I feel about the parking structure because the parking structure that you guys have designed, to the community seems to be a big issue, and I know that you're addressing this issue. I think in this page, looking at it for the first time, because I'm amazed there aren't more people in the community here tonight, even with games going on, so maybe you can schedule your meetings when there's not so much action in the evening so people can come out. I'm going to say, aesthetically, after being a resident, going to UC Berkeley, and working in Wurster Hall, that's where I got my master's degree, I'm finding it outrageously ugly. Monstrous, which will impact kids, traffic, school when school gets out; it's visually I think one big ugly block. So, I think that you got to figure out how to make it smaller, keep the traffic down, and I appreciate that you need to upgrade the hospital but at tax payers expense, looking at that, horrible in my opinion. I just want to let you know. Thank you,*

PM-19 RESPONSE:

The commenter's statements regarding the aesthetic merits and public expense of the project are noted; they do not address topics considered under CEQA. See response to Comment H-12 in Chapter 5.

The Draft EIR defines and analyzes CEQA alternatives and non-CEQA design alternatives that consider various configurations and siting of the Bon Parking Structure to reduce its visual prominence along Bon Air Road. These are addressed in Chapter 5 (*Alternatives*) of the Draft EIR as Alternative 4 starting on page 5-31, Non-CEQA Design Alternatives B and C starting on page 5-44, and under a *Bon Air Road Parking Structure / Ambulatory Services Building Swap* scenario not analyzed fully, but described on Draft EIR page 5-41. Also see responses to Comment H-10 in Chapter 5.

Regarding traffic concerns, see response to Comment PM-13.

Jean Severinghaus, Marin Resident in Greenbrae

PM-20: *I don't actually think this mic [microphone] is on because nobody in the audience can hear what's being said. I just want to say the plans look great to me. This is the first meeting that I've got notice of, I'm on email, and this is the first one I've gotten on this type of meeting. I'm very happy to know this it was happening. My little brother was born in the old wing in [1949] I think it was? And I think it's very exciting to see it more consolidated, have a more rational flow. I do have two questions.*

One is that in regards to parking and traffic, is it not how many employees come in private cars from outside of Marin, because I know that 65,000 employees come in to Marin in private cars. With the building of the SMART train coming to Larkspur, there's excellent bicycle paths coming from SMART to Marin General, and if we build really good bicycle facilities, covered, secure, locked bicycle facilities into those garages or/and also some spaces for visitors it would very helpful to help reduce, because people come in on SMART or have to get from SMART to the hospital if that's where they work, and I think there are plenty of people.

PM-20 RESPONSE:

The scope of the proposed project includes the maintenance and improvement of bicycle facilities adjacent to and within the hospital campus. This is discussed under *Pedestrian and Bicycle Access* on Draft EIR page 3-44, as well as on Draft EIR page 4.M-36. As discussed there, the proposed pedestrian crosswalks, to be installed at the project's main north and south driveway entrances at Bon Air Road, will provide pedestrian links across Bon Air Road that would allow access to adjacent pedestrian and bicycle facilities on the west side of the road. The project will not change the existing dedicated Class I path on either side of Bon Air Road. Additionally, Mitigation Measure GHG-2, as revised in response to Comment D-23 in Chapter 5, includes the project's provision of bicycle facilities (employee access to showers and changing facilities, and additional secured bicycle parking).

PM-21: *Do you know how many employees there are? It would be very helpful if you had that in there somehow.*

PM-21 RESPONSE:

Ron Peluso (Consultant): *It's one thousand seventy two (1,072).*

PM-22: *A thousand seventy two. So that could lead to car traffic.*

PM-22 RESPONSE:

See response to Comment PM-2.

PM-23: *So the second thing is, is just what has been done in building this beautiful new facility to do what you can in the design to reduce the cost of healthcare. Now that's a huge issue, but has that been thought about in the design of the hospital, what can be done to reduce costs? Maybe, can you say a few words about that?*

PM-23 RESPONSE

John Friedenber (District): *Yes, a lot of thought has gone into patient flow and that type of thing, and that again is not a CEQA issue, but a board issue, and so the design issue is looking at that, so coming to a board meeting and asking that question would be a great opportunity to hear a specific response, or I can talk to you afterwards.*

Leland Johnson, Bayview Homeowners Association

PM-24: *Yeah, thanks for this opportunity. I live on Bay View Road and we live in a small townhouse community, condo community, on Bay View Road, and I would want to address the same issues that are coming out of that road. One is about the traffic coming out of there, and how that's going to affect that entrance right next to it, if that entrance is getting to be bigger.*

PM-24 RESPONSE:

See response to Comment PM-2.

PM-25: *Another concern for me is also for pedestrians. I don't know what the plans are for having a pedestrian walk going around it, right now there's a walk that comes around there, but I noticed when we come out of that road right there by the entrance, is that there's a lot of pedestrian traffic between the hospital and to the medical buildings, and on some mornings the hospital staff will be thinking more about their work than their crossing a road where cars are coming down. And so that would be one of the considerations there. Also, the traffic, pedestrian traffic, of just walking around the hospital, that comes up a nice kind of experience to get back up going up the park.*

PM-25 RESPONSE:

See response to Comment D-13-e in Chapter 5.

PM-26: *Also, just basically the impact onto traffic on South Eliseo. As we know now with the closing of the road over in Larkspur, this has become a lot more busy. So we can already see the impact of what's already been kind of going on with the busy-ness of the traffic there, and making sure those are addressed.*

PM-26 RESPONSE:

While delays currently may be experienced on South Eliseo Drive due to nearby road closures, the project traffic analysis in the *Transportation and Circulation* section of the Draft EIR did not identify a significant adverse impact to this roadway or the Eliseo Drive/Bon Air Road intersection (Intersection #18).

PM-27: *The other one concern here is, one of the beautiful things about living in this area is the walk over here, is the walk and the whole valley and walking through the valley. And really having a not an impact on that walk. Right now the hospital, it pretty much blends in.*

PM-27 RESPONSE:

See response to Comment J-18 in Chapter 5.

PM-28: *And as one person mentioned about the aesthetics of the place, one concern I've always had is about the lighting. That the lighting be low impact lighting, that it doesn't show into the valley, it doesn't take away from the aesthetics of this beautiful valley and this beautiful place we live in. Like the building that has the master lease on that has these ugly white bulbs that you can see right down the valley. And just that little bit is there, so now with huge construction coming up I want to make sure that is addressed in there. And yeah, the basic aesthetic of the place would be, those would be the points.*

PM-28 RESPONSE:

The conceptual lighting plan for the project is shown in Draft EIR Figure 3-16 and described on Draft EIR page 3-51. Specific measures for the type, location, and operation of all new lighting for the project are included in Impact AES-4 on Draft EIR page 4.A-30. A specific assessment of new lighting effects and measures specific to the

proposed parking structures is presented in Chapter 2 (*Project Clarifications and Additional Information*) of this Final EIR, under *Discussion of Simulations and Photos*, starting on page 2-18.

PM-29: *I don't know, what is in the plan about putting a helicopter, did I miss that? There is none? Okay, not in this plan, okay I was just wondering about that. Okay, that's what I have. Thank you.*

PM-29 RESPONSE:

See response to Comment PM-4.

Xantha Bruso

PM-30: *I'm another neighbor on Bay View Road. I just moved here about a month ago. And so, you know, I haven't been able to read the whole environmental impact statement, but some of the concerns, I think I would echo my neighbors, is that I have two young children, one and three. And we go to the park a lot, so my concerns are safety with traffic, both the amount of traffic and flow of traffic, so I'm encouraged by the inclusion of a crosswalk there, that's definitely important. But whatever other methods could be used to help with traffic calming and direction so that people aren't speeding on Bon Air, especially since we're so close to the hospital entrance that if there's an emergency, people could be speeding, not paying attention, and not noticing there's a small road just after the hospital that kids live down. So, I would really encourage any other sorts of traffic calming measure that you could include in the plan as well as better access to the sidewalks, because there are so many kids who use that park and a sidewalk is, at least on that side, it's a little bumpy, a little narrow, and could definitely be improved if there are going to be other streetscape improvements.*

PM-30 RESPONSE:

The project proposes improvements along Bon Air Road to improve access and egress (both for the public and emergency vehicles) and pedestrian and vehicular safety. While not intended as a traffic-calming measure, the two new signals that the project would install on Bon Air Road would periodically slow or stop vehicles along Bon Air Road; currently no signals exist along this roadway between Sir Francis Drake and South Eliseo. Overall, the potential for vehicles to travel at excessive speeds along Bon Air Road in emergency situations (the instance the commenter raises) is not a function of the proposed project.

Len Rifkind, Larkspur City Council

PM-31: *I'm one of the Larkspur City Councilmen and I've had the opportunity to serve as mayor this year. And I just wanted to bring to the District's attention that Bon Air Bridge is going to need to be replaced shortly, and it's actually going to happen sooner than we anticipated. We're told that it's deteriorated – it's safe - but it's deteriorating quicker than we anticipated. Caltrans has put pressure on the City to get going and so I'm simply encouraging the District, when the construction starts, to coordinate with the City of Larkspur so that we can do it in a coordinated fashion. Thank you.*

PM-31 RESPONSE:

The Bon Air Bridge improvement project is discussed under *Future Transportation Improvements* on Draft EIR page 4.M-24, in regards to the necessary coordination that the proposed project shall ensure before and during construction to avoid potential conflicts between the two projects, if there is overlap in construction activity (which would be specified in detail in the construction management plan); see the last paragraph of response to Comment D-3 in Chapter 5.

Deana Kardel, Neighbor

PM-32: *And I am also one of the residents on Bay View Road, and my concern obviously is with others with the aesthetics and the noise. I just wondered how they come up with the decibels of the impact of when they say the noise can't exceed blah blah blah. I mean, we hear the jack hammering when they replaced the [inaudible 41:00] at the creek. They would start, and it says they can't start until 8:00 but they were out there very early and it's just very disruptive and I'm just concerned about the noise.*

PM-32 RESPONSE:

See response to Comment PM-33 regarding the aesthetics portion of the comment.

Regarding the determination of maximum allowable noise levels for construction activities, the approach and quantitative thresholds to the noise analysis conducted for the proposed project is described on Draft EIR page 4.J-14. That section explains how the quantitative thresholds were developed, the standards selected for the analysis of the proposed project, and how a significant CEQA impact is determined (which is also listed under *Significance Criteria* starting on Draft EIR page 4.J-13) – both for construction noise as well as noise associated with the project after it is completed. Construction noise methods are specifically described in the last paragraph on Draft EIR page 4.J-14.

The construction noise analysis for the proposed project is presented under Impact NOI-2, starting on Draft EIR page 4.J-16. The analysis concluded that project

construction would substantially and temporarily increase noise levels at nearby sensitive receptors, which are identified as the residential uses along Via Hidalgo, Spyglass Hill, Corte Oriental, Bayview Road, Harvard Drive, Berens Drive, as well as Marin Catholic High School and patient rooms in the existing hospital (which would remain operational during construction).

The comprehensive Mitigation Measure NOI-2 (starting on Draft EIR page 4.J-19) is required for the project, however, even combined with existing regulations and enforcement provisions of the Marin County Municipal Code, would not reduce the impact to less than significant. As discussed in the analysis, this is primarily due to the “extended period of time” when adjacent receivers would be exposed to noise levels above the established significance thresholds, despite the use of “loud noise-generating construction-related equipment” (e.g., backhoes, generators, jackhammers) typically being intermittent and relatively short-lived in the overall construction phase.

Regarding construction hours, consistent with the County Municipal Code (sometimes referred to as the Noise Ordinance), Mitigation Measure NOI-2 would prohibit noise-generating activities at the construction site or in areas adjacent to the construction site from starting before 7:00 a.m. on weekdays and 9:00 a.m. on Saturday; use of loud noise-generating equipment, which includes jackhammers, would be restricted to after 8:00 a.m. during the week only. (The County Code does provide for special exceptions to these limitations, as specified on Draft EIR page 4.J-9.)

Mitigation Measure NOI-2 would also require the project applicant to designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. Moreover, the County Noise Ordinance specifies penalties for violation, also provided on Draft EIR page 4.J-9.

PM-33: *And the aesthetic of the building, too. I think Marin is a beautiful area and to have a structure that doesn't at least make an aesthetic statement too, I think there's an opportunity that I wouldn't, I think you should consider as to what that can bring to the community even with some type of aesthetic statement that could bring to a state of the art hospital.*

PM-33 RESPONSE:

See response to Comments PM-19 and PM-27.

Margaret Jones, League of Women Voters

PM-34: *I have my [speaker] card, the questions are written out, I'll go through them fast. Are the walkways that go from the garage to the hospital covered and wind proof? We are reminded of the problems of rain today. And rain and wind are problems, particularly for frail people trying to get from the garage to the building. That's one.*

PM-34 RESPONSE:

As stated in the second paragraph on Draft EIR page 3-17, the project proposes a ground-level covered walkway from the Bon Air Road Parking Structure to the Hospital Replacement Building and the Ambulatory Services Building. As an alternative option, the project considers an elevated pedestrian bridge following a different route than the ground-level covered walkway between these buildings, if the District is able to secure adequate funding for this optional element.

PM-35: *Second one, is there an onsite child care facility for staff members? If the hospital is going to operate 24 hours a day, and most childcare centers operate from 8:00 to 5:00, wouldn't it be a good idea to have a place for the staff children to be cared for?*

PM-35 RESPONSE:

The project does not propose an onsite child care facility for staff members as part of this project. Nor does this suggestion address a potential environmental impact of the project. The comment is noted for the District's consideration.

PM-36: *Three, is there any place on this campus where children who are waiting hour after hour in this building, perfectly healthy, but they have to wait for family reasons, is there any place for them to go out and play with a supervisor. I think all hospitals should have a place for children to wait in.*

PM-36 RESPONSE:

The project does not propose specific children's waiting areas. This suggestion does not address a potential environmental impact of the project, and the comment is noted for the District's consideration.

PM-37: *Okay, where on this map are the public transit stops? Where do the buses come and let people off? People now, are walking all of the way down from Sir Francis Drake, which is a "goodly" jaunt sometimes.*

PM-37 RESPONSE:

Ron Peluso (Consultant): *So, we're talking to Golden Gate Transit about changing their route. So if that were to happen, they said they were willing to look at it and discuss it, both stops, we'd have one in front of the hospital here [inaudible 44:05 to 44:10], so one at the entrance here, we'd have another one at the current location [inaudible 44:15 to 44:33].*

Final EIR Response Supplement: Two bus shelters are currently located at the project site: one bus shelter adjacent to the West Wing (existing south parking lot) and another located on Bon Air Road at the north vehicular entrance to the project site (see second paragraph on Draft EIR page 3-11). As described under *Transit Access* on Draft EIR page 3-43 and shown in Draft EIR Figure 3-5, (1) the existing stop at the north vehicular entrance would be moved north slightly on Bon Air Road to accommodate the new (widened) north access driveways; (2) the existing stop near the West Wing is proposed to be relocated to Bon Air Road near the south access driveway; and (3) two new stops are proposed across Bon Air Road. (This sequence is also described in the *Construction Logistics* discussion, starting on Draft EIR page 4.N-24, as supplemented in Chapter 3 [*Changes to the Draft EIR*] in this Final EIR). Marin Healthcare District is coordinating with Marin Transit and the Golden Gate Transit District on these proposed changes, as well as with Marin County about right-of-way and safety considerations.

PM-38: *Okay. Another transit question. Is there going to be a charge for parking in the garage? Is that essential to pay for the cost of the garage? And does that sometime force people to go into the surrounding neighborhood to see if they can find a free place to park. I just raise that as an issue.*

PM-38 RESPONSE:

The project does not propose to charge for parking in the proposed parking structures or any other parking areas.

PM-39: *And have you considered the possibility that for neighborhoods where many, many employees live, having a shuttle bus at eight, and four, and twelve, and you know. If you could bring twenty people in one vehicle it would save a lot of time, but that takes money and planning also.*

PM-39 RESPONSE:

See response to Comment H-22 in Chapter 5.

Ann Thomas

PM-40: *I'm a resident of Corte Madera, and I just have a couple of comments. Could you clarify that the number of licensed beds is not the same as the number of beds onsite? I think there's a little misunderstanding about that. You currently have, according to the EIR, 128 beds and that number would increase to 235 at project completion, so you will be adding about 100 beds.*

PM-40 RESPONSE:

There are a total of 235 licensed beds on the campus, including 17 beds in the Mental Health Building. There are 148 beds currently in use. The clarification of “licensed beds” and “beds in use” (or Average daily census, ADC) is made throughout the Draft EIR; see Chapter 3 (*Changes to the Draft EIR*) in this Final EIR.

PM-41: *About 56 percent of your employees, according to the EIR, come from out of county. It would be helpful if you could just give us an idea of where they come from, how many from Sonoma, how many from Alameda, Contra Costa, etc? And even how many, you know, where the bulk of them come from in Marin County, because you mentioned that the typical commute is an average of something like nineteen miles.*

PM-41 RESPONSE:

See response to Comment H-20 in Chapter 5 for existing employees' place of residence. About 40 percent of the respondents live within 10 miles of the hospital, while the average commute length of all respondents is 19.2 miles (see Draft EIR pages 4.M-38-39). The top ten cities of residence of the Marin General Hospital employees who responded to the commuter survey conducted by *511 Rideshare*¹ are shown below.

TOP 10 MARIN COUNTY PLACES OF RESIDENCE OF MGH EMPLOYEES (Approximately 63 percent of total surveyed)*

9 County Bay Area	% of Total
San Rafael	15%
Novato	12%
Petaluma	8%
San Anselmo	6%
Santa Rosa	6%
Corte Madera	4%
Larkspur	3%
Greenbrae	3%
Rohnert Park	3%
Mill Valley	3%

* Based on survey of approximately 32 percent of employees.

SOURCE: *511 Rideshare Marin General Hospital Transportation Survey Results*, April, 2011. Table 14

¹ *511 Rideshare Marin General Hospital Transportation Survey Results*, April, 2011.

PM-42: *Approximately how many of the district employees work off campus? You have several buildings around Kentfield and Greenbrae mostly, how many employees there? What happens to them? Are they coming on-site? It does say in the EIR that some of them will be relocated. How many of them will be relocated? And will they go? And, I think that was it. Thank you.*

PM-42 RESPONSE:

Jon Friedenber (District): *While you're filling out the card, I'll just say that the hospital is currently licensed for approximately 235 beds, and when we get done with the project that will be the same. The big difference is that right now in order to get 235 patients into the hospital, there has to be two people in every double room, and four people in every quad. And in the new hospital all of the new beds are going to be, or virtually all of the new beds are going to be private rooms and that's one of the other advantages and in another venue I can explain why we're doing that but its standard in the industry now and so that's one of the other benefits.*

Final EIR Response Supplement: See response to Comment H-6, and related Comment H-17, in Chapter 5.

Alan Derwin, Kentfield Planning Advisory Board

PM-43: *I'm a resident of Kentfield; I served as vice chair of the Kentfield Planning Advisory Board. I know that traffic will be a huge concern as we've all discussed and everybody knows. I'm an avid cyclist and probably more of a competitive cyclists but a lot of people are not advanced cyclists. What I ask is, I know that, it's been stated that bike transportation is a key component, this being an element of the proposal. I would ask that you work with the Marin Bicycle Coalition, the City of Larkspur, and the county to perhaps address bike lanes along Sir Francis Drake. The reason I mention my cycling is, there is a bike path from the ferry, but it goes over a hill from a path and goes to South Eliseo. It's an easy enough hill for someone like myself, but maybe someone who's not an advanced cyclist or maybe someone who doesn't have a great bicycle, that's kind of a steep hill, and coming back the other way from the hospital, back to, towards the ferry to the path, that could be a hill to where you have to get off your bike. So I've always wanted to have a bike path from, say College Ave, all the way down to the ferry, to Bon Air Center and the shopping. I think this might be a good opportunity to work with the powers that be to maybe look into something like that.*

PM-43 RESPONSE:

See response to Comment PM-20.

PM-44: *The other thing, I brought up the garage before in past meetings, and I know you're doing everything you can, and I really appreciate that, to minimize the scope and scale and all of those sorts of things. I was in Petaluma recently and I saw a five story garage that was brick, and I didn't even know that it was a garage. And I know, perhaps, brick might not be in the design plan, and this is not a design review or anything like that, but I like to bring that up as a possibility sooner than later, and even if it's not brick, maybe something that works in a more harmonious, aesthetically pleasing way, that blends in with the environment, just to consider something like that. Thank you very much.*

PM-44 RESPONSE:

See responses to Comment H-12 and related Comment H-10 in Chapter 5, as well as response to Comment PM-19, above.

Xantha Bruso (repeat speaker)

PM-45: *Xantha Bruso, I live on 59 Bay View Road and I just recall that when looking at schools I know that a lot of parents park on Bay View and then they walk their kids on the bike path from the creek, I mean from the park to Bacich Elementary, so I don't know if that was accommodated for in your Environmental Impact Statement, or if there had been coordination with the school district because of the encouragement of the school district has for parking outside the school and then walking, or having kids bike from there. So that's another thing because you're right near the school and the traffic would impact that flow of traffic.*

PM-45 RESPONSE:

Ron Peluso (Consultant): *Safe Routes to Schools - it's a program within TAM that provides a safe route for kids to travel to school. We're actually talking to them about helping us put a crosswalk in now as opposed to waiting until a traffic signal at the North entrance of the campus.*

Melissa Panages, Neighbor (repeat speaker)

PM-46: *I have a question, I was a little unclear and maybe you guys can clarify it. When you were speaking about the buses bringing say the elderly, because I know the elderly need to be dropped off in front of the hospital, rather than have to be dropped off at the Sir Francis Drake Blvd and then forced to walk down the way, is that bus going to be stopped that will stop traffic once it pulls over to let, you know, the elderly off, of whoever needs to get here by bus, is that going to impact the road at all, or stop up traffic?*

So it'll be pulling in then, in other words.

PM-46 RESPONSE:

Ron Peluso (Consultant): *The buses I was referring to are the Golden Gate Transit buses. The ones that bring patients onto the site, those will continue to be onsite and not impact street traffic.*

PM-47: *Oh, okay, so that would make a difference. I just want to make a comment about another citizen here who mentioned an area for kids. That seems to me a bit of an oversight because, it is true the pressure that adults are under when an elderly parent is sick and dying, with my brother and my sister there was no place my sister could bring the kids to go take a break from the intensity when someone passes away, so I really think that needs to be addressed in a big way. Thank you.*

PM-47 RESPONSE:

See responses to Comments PM-35 and PM-36.

Ann Petersen, Kentfield Planning Advisory Board (repeat speaker)

PM-49: *One of the points in the Environmental Impact Report is that the high drive-alone rate of 89 percent of the workers here drive alone and they average 19.2 miles. And those are issues that we would like to see addressed with serious mitigation measures before the project gets started.*

PM-49 RESPONSE:

See response to Comment D-23 in Chapter 5.

6.2 Responses to Written Comments Received at the Public Meeting on the Draft EIR

The following pages present written comments submitted at the public meeting on the Draft EIR. Responses are provided following the comments.

Marin General Hospital Replacement Building Project
Draft Environmental Impact Report (EIR)

Comment Letter PM-A

Please complete and submit this Speaker Card to the Comment Period Facilitator, who will call speakers in the order that cards are received. A time allowance may be set for each speaker, depending on the number of speaker requests received. Print clearly to ensure your information is recorded accurately for the EIR record.

Name: Theresa Ward
Affiliation (if any): Spyglass Hill
Street Address: 647 Via Cositas
City, State, Zip: Greenbrae

I also submitted hard copy materials to the Comment Period Facilitator during the Community Meeting (check if applicable).



2) See Back.

Highest level of party structure
meet one by one with
SPA

How will where one leads
will be A - How high.

PM-A-1

(2)

Theresa Ward, Spyglass Hill Property Owners Association

PM-A-1: The written comment appears to be the same as previously posed by the commenter; see responses to Comments PM-9 and PM-10.

**Public Meeting Speaker Card – October 11, 2012
Marin General Hospital Replacement Building Project
Draft Environmental Impact Report (EIR)**

Please complete and submit this Speaker Card to the Comment Period Facilitator, who will call speakers in the order that cards are received. *A time allowance may be set for each speaker, depending on the number of speaker requests received.* Print clearly to ensure your information is recorded accurately for the EIR record.

Name: Melissa Panages PANAGES

Affiliation (if any): Resident / user of MGH

Street Address: 3 Hillside Ave

City, State, Zip: Rancho, CA 94904

I also submitted hard copy materials to the Comment Period Facilitator during the Community Meeting (check if applicable).

(5)
Back



Other thing we could be doing? (9)
that seems to me
this impacts the community
the issue is the financial impact
the bond has on households
that are already struggling.
a so little community is here
tonight - what about more
community Townhall meetings?

PM-B-1

Melissa Panages, Neighbor

PM-B-1: The written comment appears to be the same as previously posed by the commenter; see response to Comment PM-19.

please complete and submit this Speaker Card to the Comment Period Facilitator, who will call speakers in the order that cards are received. A time allowance may be set for each speaker, depending on the number of speaker requests received. Print clearly to ensure your information is recorded accurately for the EIR record.

Name: Jean Sevenshaws

Affiliation (if any): Marin resident in Greenbrae

Street Address: 117 Greenbrae Boardwalk

City, State, Zip: Greenbrae, CA 94904

I also submitted hard copy materials to the Comment Period Facilitator during the Community Meeting (check if applicable)

- 1) Bicycle access & good secure storage for employees and doctors and visitors
- 2) what has been done in the design to lower



PM-C-1

Keep the costs of healthcare down to the extent that is possible to do in the design?

PM-C-2

6

Jean Severinghaus, Marin Resident in Greenbrae

PM-C-1: The written comment appears to be the same as previously posed by the commenter and others; see responses to Comments PM-20 and PM-43.

PM-C-2: The written comment appears to be the same as previously posed by the commenter; see response to Comment PM-23.

Marin General Hospital Replacement Building Project
Draft Environmental Impact Report (EIR)

Please complete and submit this Speaker Card to the Comment Period Facilitator, who will call speakers in the order that cards are received. A time allowance may be set for each speaker, depending on the number of speaker requests received. Print clearly to ensure your information is recorded accurately for the EIR record.

Name: Margaret Jones
Affiliation (if any): League of Women Voters
Street Address: 280 Madrona
City, State, Zip: Belvedere CA 94920

I also submitted hard copy materials to the Comment Period Facilitator during the Community Meeting (check if applicable).

14



- 1. Are the walkways from the garage to the hospital covered? and wind proof. Rain and wind are problem.
- 2. Is there an onsite, child care facility for staff members if the hospital operates 24 hours a day.
- 3. Is there an outdoor play space for children (healthy) who are spending hours waiting.
- 4. Where are public transit stops
- 5. Have you considered employee shuttles.
- 6. Is there to be a charge for parking in the garage. Is it essential?

PM-D-1
PM-D-2
PM-D-3
PM-D-4
PM-D-5



Margaret Jones, League of Women Voters

- PM-D-1: The written comment appears to be the same as previously posed by the commenter; see response to Comment PM-34.
- PM-D-2: The written comments appear to be the same as previously posed by the commenter; see responses to Comments PM-35 and PM-36.
- PM-D-3: The written comment appears to be the same as previously posed by the commenter; see response to Comment PM-37.
- PM-D-4: The written comment appears to be the same as previously posed by the commenter; see response to Comment PM-39.
- PM-D-5: The written comment appears to be the same as previously posed by the commenter; see response to Comment PM-38.

6.3 Public Comment Period Closing and Public Direction

Ed Shaffer (Consultant/Counsel): And the reason for [needing you on the microphone for the public record] is that we're supposed to have a transcript or a summary of everyone's comments in the document so that we then write responses to, and when we don't get it clearly, or don't get your name so we can send you a notice, or send you a copy of the response, agencies get flack afterwards for saying you didn't answer my question. It's because it wasn't recorded clearly.

Crescentia Brown (Consultant): If you have written comments, either with you tonight, even if they are notes and you would like to submit those, you can certainly do that. And I think, if there are no more comments, I want to be sure, I don't want anyone to feel rushed. Okay. I believe Ed was going to summarize about next steps and additional opportunities to comment.

Ed Shaffer (Consultant/Counsel): CEQA requires the agency to have a minimum 45 day time period to receive comments, written or oral, and that was the purpose of this meeting. To receive, if you want to have additional comments, you should put them in writing; the notice there has an address for submitting them. The original comment period would end on Oct 19th, that has been extended to a week and one half from now, Monday, October 22nd, so if you could, if you have further comments you want to submit then feel free, please do, and every comment we receive, a response will be written to those comments and that will be assembled together with this document and be presented to the board of directors at the end of the process. Thank you.

Crescentia Brown (Consultant): Right before we close, just a reminder, if you did not speak, I implore you to sign in on the sign-in sheet, and Jamie has set one in the back, and I think there's a couple. Okay, great. Thank you.

John Friedenber (District): Again I want to thank you for coming out tonight. As I said, I know there are a lot of competing things going on. Your views, your questions, your comments are important to us. We will respond to all of them. If you have other comments, as was stated, regarding the EIR, please submit them in writing. And if you have questions or comments unrelated to the EIR, I invite you to send them to me, or to Jamie, in the back, at any time. Send us an email, give us a \call, send us a letter, and thank you very much and have a good evening.

APPENDIX A

Synchro-Simtraffic Vehicle Queuing Reports

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Queuing and Blocking Report
 Vehicle Queuing Report

Weekday PM Peak Hour Yr. Existing Conditions
 12/21/2012

Intersection: 9: Sir Francis Drake Blvd. & US101 SB Off

Movement	EB	EB	EB	WB	WB	WB	SB
Directions Served	T	T	T	T	T	T	L
Maximum Queue (ft)	118	120	111	326	356	315	108
Average Queue (ft)	68	60	62	166	167	149	56
95th Queue (ft)	103	97	97	285	301	273	103
Link Distance (ft)	219	219	219	356	356	356	2221
Upstream Blk Time (%)				0	0	0	
Queuing Penalty (veh)				0	1	0	
Storage Bay Dist (ft)							
Storage Blk Time (%)							
Queuing Penalty (veh)							

Intersection: 10: Sir Francis Drake Blvd. & US101 NB On

Movement	EB	EB	EB	WB	WB	WB	WB	NB	NB	NB
Directions Served	L	L	T	T	T	T	R	T	T	R
Maximum Queue (ft)	315	309	332	417	404	379	255	398	382	669
Average Queue (ft)	206	197	141	267	240	213	129	122	107	28
95th Queue (ft)	288	286	267	380	357	319	229	253	242	249
Link Distance (ft)	356	356	356	994	994	994		802	802	802
Upstream Blk Time (%)			0					0	0	0
Queuing Penalty (veh)			0					0	0	0
Storage Bay Dist (ft)							715			
Storage Blk Time (%)										
Queuing Penalty (veh)										

Network Summary

Network wide Queuing Penalty: 2

Queuing and Blocking Report
 Vehicle Queuing Report

Weekday PM Peak Hour E+Yr. 2035 Prj. Conditions
 12/21/2012

Intersection: 9: Sir Francis Drake Blvd. & US101 SB Off

Movement	EB	EB	EB	WB	WB	WB	SB
Directions Served	T	T	T	T	T	T	L
Maximum Queue (ft)	139	126	150	304	310	303	117
Average Queue (ft)	79	72	74	157	158	148	62
95th Queue (ft)	121	112	125	274	269	263	101
Link Distance (ft)	219	219	219	356	356	356	2221
Upstream Blk Time (%)							
Queuing Penalty (veh)							
Storage Bay Dist (ft)							
Storage Blk Time (%)							
Queuing Penalty (veh)							

Intersection: 10: Sir Francis Drake Blvd. & US101 NB On

Movement	EB	EB	EB	WB	WB	WB	WB	NB	NB	NB
Directions Served	L	L	T	T	T	T	R	T	T	R
Maximum Queue (ft)	376	387	403	408	384	340	268	180	185	401
Average Queue (ft)	300	298	212	260	237	210	147	118	95	13
95th Queue (ft)	402	406	411	358	337	304	243	168	153	160
Link Distance (ft)	356	356	356	994	994	994		802	802	802
Upstream Blk Time (%)	4	2	2							
Queuing Penalty (veh)	14	9	9							
Storage Bay Dist (ft)							715			
Storage Blk Time (%)										
Queuing Penalty (veh)										

Network Summary

Network wide Queuing Penalty: 32

Intersection: 9: Sir Francis Drake Blvd. & US101 SB Off

Movement	EB	EB	EB	WB	WB	WB	SB
Directions Served	T	T	T	T	T	T	L
Maximum Queue (ft)	118	115	104	333	345	335	126
Average Queue (ft)	65	61	63	180	175	167	62
95th Queue (ft)	102	95	100	306	306	293	108
Link Distance (ft)	219	219	219	356	356	356	2221
Upstream Blk Time (%)				0	0	0	
Queuing Penalty (veh)				0	1	0	
Storage Bay Dist (ft)							
Storage Blk Time (%)							
Queuing Penalty (veh)							

Intersection: 10: Sir Francis Drake Blvd. & US101 NB On

Movement	EB	EB	EB	WB	WB	WB	WB	NB	NB	NB
Directions Served	L	L	T	T	T	T	R	T	T	R
Maximum Queue (ft)	346	352	347	465	448	431	302	223	573	700
Average Queue (ft)	242	232	169	284	266	234	158	124	122	84
95th Queue (ft)	351	338	326	417	401	368	262	186	317	427
Link Distance (ft)	356	356	356	994	994	994		802	802	802
Upstream Blk Time (%)	1	1	1						0	
Queuing Penalty (veh)	2	2	4						0	
Storage Bay Dist (ft)							715			
Storage Blk Time (%)										
Queuing Penalty (veh)										

Network Summary

Network wide Queuing Penalty: 9

Intersection: 9: Sir Francis Drake Blvd. & US101 SB Off

Movement	EB	EB	EB	WB	WB	WB	SB
Directions Served	T	T	T	T	T	T	L
Maximum Queue (ft)	170	155	164	350	360	374	202
Average Queue (ft)	84	79	84	167	169	160	74
95th Queue (ft)	137	128	139	308	315	321	139
Link Distance (ft)	219	219	219	356	356	356	2221
Upstream Blk Time (%)	0			0	0	0	
Queuing Penalty (veh)	0			0	0	3	
Storage Bay Dist (ft)							
Storage Blk Time (%)							
Queuing Penalty (veh)							

Intersection: 10: Sir Francis Drake Blvd. & US101 NB On

Movement	EB	EB	EB	WB	WB	WB	WB	NB	NB	NB
Directions Served	L	L	T	T	T	T	R	T	T	R
Maximum Queue (ft)	377	409	397	455	430	412	324	242	359	669
Average Queue (ft)	320	317	253	281	259	237	171	127	113	68
95th Queue (ft)	408	420	448	408	386	369	276	197	238	387
Link Distance (ft)	356	356	356	994	994	994		802	802	802
Upstream Blk Time (%)	6	6	6							
Queuing Penalty (veh)	25	22	23							
Storage Bay Dist (ft)							715			
Storage Blk Time (%)										
Queuing Penalty (veh)										

Network Summary

Network wide Queuing Penalty: 73

Intersection: 9: Sir Francis Drake Blvd. & US101 SB Off

Movement	EB	EB	EB	WB	WB	WB	SB
Directions Served	T	T	T	T	T	T	L
Maximum Queue (ft)	150	162	153	344	344	319	156
Average Queue (ft)	69	72	80	188	184	168	74
95th Queue (ft)	117	119	134	311	308	284	132
Link Distance (ft)	219	219	219	356	356	356	2221
Upstream Blk Time (%)			0	0	0	0	
Queuing Penalty (veh)			0	1	0	1	
Storage Bay Dist (ft)							
Storage Blk Time (%)							
Queuing Penalty (veh)							

Intersection: 10: Sir Francis Drake Blvd. & US101 NB On

Movement	EB	EB	EB	WB	WB	WB	WB	NB	NB	NB
Directions Served	L	L	T	T	T	T	R	T	T	R
Maximum Queue (ft)	378	419	405	522	499	479	413	772	823	836
Average Queue (ft)	298	298	247	313	291	269	193	183	490	544
95th Queue (ft)	385	400	433	453	432	408	317	458	1056	1135
Link Distance (ft)	356	356	356	994	994	994		802	802	802
Upstream Blk Time (%)	3	2	4					0	4	16
Queuing Penalty (veh)	11	9	15					0	0	0
Storage Bay Dist (ft)							715			
Storage Blk Time (%)										
Queuing Penalty (veh)										

Network Summary

Network wide Queuing Penalty: 37

Intersection: 9: Sir Francis Drake Blvd. & US101 SB Off

Movement	EB	EB	EB	B31	B31	WB	WB	WB	WB	SB
Directions Served	T	T	T	T	T	T	T	T	T	L
Maximum Queue (ft)	231	226	230	18	12	375	359	354	201	
Average Queue (ft)	110	103	107	1	0	194	194	184	96	
95th Queue (ft)	193	186	191	10	7	315	322	305	178	
Link Distance (ft)	219	219	219	1145	1145	356	356	356	2221	
Upstream Blk Time (%)	1	0	1			0	0	0		
Queuing Penalty (veh)	0	0	0			2	1	1		
Storage Bay Dist (ft)										
Storage Blk Time (%)										
Queuing Penalty (veh)										

Intersection: 10: Sir Francis Drake Blvd. & US101 NB On

Movement	EB	EB	EB	WB	WB	WB	WB	NB	NB	NB
Directions Served	L	L	T	T	T	T	R	T	T	R
Maximum Queue (ft)	377	413	415	490	455	451	364	810	832	833
Average Queue (ft)	338	343	307	306	287	262	193	211	543	568
95th Queue (ft)	405	421	482	434	413	394	293	544	1088	1159
Link Distance (ft)	356	356	356	994	994	994		802	802	802
Upstream Blk Time (%)	15	12	8					0	3	17
Queuing Penalty (veh)	65	51	35					0	0	0
Storage Bay Dist (ft)							715			
Storage Blk Time (%)										
Queuing Penalty (veh)										

Network Summary

Network wide Queuing Penalty: 155

APPENDIX B

Draft Mitigation Monitoring and Reporting Program (MMRP)

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**TABLE B-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.A Aesthetics					
<p>Mitigation Measure AES-1: The applicant shall add taller tree cover west of the Hospital Replacement Building to “break” up the building’s west facing facade, as seen from the Corte Madera Creek pathway looking east. In addition to the proposed relocated palm trees and deciduous trees proposed along the west portion of the project site, three to four tall evergreen conifers, such as redwoods or other tree of similar height and shape (e.g., columnar with a tall trunk without dense low branch cover) shall be added to the proposed landscape plan and installed prior to completion of the Hospital Replacement Building. These additional trees shall be adequately spaced in the area between the building and the west edge of the project site to prevent full blockage of views toward Corte Madera Creek, Creekside Marsh, Hal Brown Park and/or views Mt. Tamalpais from hospital rooms. Prior to Design Review approval of the Hospital Replacement Building, the applicant shall present the final landscape plan to the County for conformance review with this measure.</p>	Project Construction Manager	County Planning Division	Verify at time of finalization of specifications.	At time of landscaping of project site and prior to occupancy of Hospital Replacement Building.	
<p>Mitigation Measure AES-2: The most visible area of retaining walls along the south access road shall be altered by “stepping” the retaining walls on the hillside for the area that is within 250 feet of Bon Air Road. This shall only apply when retaining walls exceed five feet in height. The “steps” of the retaining walls shall be at least two feet in depth to allow planting areas, and the retaining wall heights shall be no greater than five feet. Evergreen plantings shall be added in the stepped portions of the walls to create a partially vegetated and more naturalized slope, more consistent with the existing vegetated area visible south of the proposed retaining wall, compared to 90-degree-vertical retaining walls with no vegetation. Prior to Design Review approval of the Hospital Replacement Building, the applicant shall present the final south access road retaining walls and planting plans to the County for conformance review with this measure.</p>	Project Construction Manager	County Planning Division	Verify at time of finalization of specifications.	At time of landscaping of project site and prior to occupancy of Hospital Replacement Building.	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.B Air Quality					
<p>Mitigation Measure AIR-2: The measures listed below to control diesel exhaust emissions associated with demolition, grading and new construction shall be implemented. These measures shall apply to all phases even though the only potential exceedance of a threshold is in 2015 (or through Phase III):</p> <ol style="list-style-type: none"> 1. Prior to the commencement of construction activities, the developer or contractor will provide a plan for approval by the District or BAAQMD demonstrating that the heavy-duty (>50 horsepower) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction. The NOx reduction will be based on a comparison to URBEMIS2007 emissions estimates for this project (see Appendix C to this Draft EIR). This plan will address all equipment that will be on site for more than two working days. 2. Diesel particulate filters (or features that provide equivalent level of PM_{2.5} emissions reductions) shall be installed on all diesel-powered equipment with engines larger than 50 horsepower that will be working on the site for more than two working days. These features are anticipated to provide at least a 45-percent reduction in PM_{2.5} exhaust emissions. 3. During building construction, establish on-site electric power to reduce the use of diesel-powered generators. 4. Arrange for service to provide on-site meals for construction workers to avoid travel to off-site locations. 5. Stage construction equipment at least 200 feet from existing or new habitable residences. 6. Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes in accordance with the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations. Clear signage will be provided for truck operators and construction workers at all access points. 7. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications. All equipment will be checked by a certified mechanic and determined to be running in proper condition prior to operation. 	Project Construction Manager and Contractor	Project Construction Manager	Prior to and during all phases of construction.	On-going during construction.	

**TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.B Air Quality (cont.)					
<p>8. Require an on-site disturbance coordinator to ensure that the construction period mitigation measures are enforced. This coordinator will respond to complaints regarding construction activities and construction caused nuisances. The phone number of this disturbance coordinator will be clearly posted at the construction site and provided to nearby residences. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. A log documenting any complaints and the timely remedy or outcome of such complaints will be kept.</p>					
<p>Mitigation Measure AIR-3: The contractor shall implement the following BAAQMD recommended basic fugitive dust mitigation measures:</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 	Project Construction Manager and Contractor	Project Construction Manager	Prior to and during all phases of construction.	On-going during construction.	
Mitigation Measure AIR-5: Implement Mitigation Measure AIR-2	See Mitigation Measure AIR-2.				
Mitigation Measure AIR-8: Implement Mitigation Measures AIR-2 and AIR-3.	See Mitigation Measure AIR-2 and AIR-3.				

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.C Biological Resources					
<p>Mitigation Measure BIO-1: (Applies to Phases I through IV) The project applicant shall ensure that construction activities are conducted in a manner that avoids disturbance or mortality of bats, through surveys to determine whether bats are present. If bats are present, limit construction activities as specified below. Specifically, the project applicant shall take the following measures to avoid direct mortality of roosting special-status bats and disturbance of maternity roosts or winter hibernacula during Phases I through IV of the project:</p> <p>a) Prior to demolition and/or construction of Phases I through IV, a qualified bat biologist, shall conduct surveys of all potential bat habitat within 250 feet of construction activities prior to initiation of such activities. Potentially suitable habitat shall be identified visually. An acoustic detector shall be used to determine any areas of bat activity. At least four nighttime emergence counts shall be undertaken on nights that are warm enough for bats to be active. The bat biologist shall determine the type of each active roost (i.e., maternity, winter hibernaculum, day or night).</p> <p>b) If based on the pre-construction surveys no evidence of bats (i.e., visual or acoustic detection, guano, staining, strong odors) is present, no further mitigation is required. If pre-construction surveys indicate that roosts are inactive or potential habitat is unoccupied during the construction period, no further mitigation is required.</p> <p>c) Trees or buildings with evidence of bat activity shall be removed during the time that is least likely to affect bats, as determined by a qualified bat biologist. In general, roosts should not be removed if maternity bat roosts are present, typically April 15 – August 15. Roosts should not be removed if present bats are in torpor, typically when temperatures are less than 40 degrees Fahrenheit. Non-maternity bat roosts shall be removed by a qualified bat biologist, by either making the roost unsuitable for bats by opening the roost area to allow airflow through the cavity, or excluding the bats using one-way doors, funnels, or flaps.</p> <p>d) A no-disturbance buffer shall be created around active bat roosts being used for maternity purposes at a distance to be determined by the qualified bat biologist in consultation with CDFW. Bat roosts initiated within 250 feet of the project area after construction has already begun are presumed to be unaffected, and no buffer is necessary. However, the project shall avoid a “take” of individuals, including harming, harassing, or killing.</p>	<p>Project Construction Manager, Qualified District Biologist, in consultation with CDFW, if necessary.</p>	<p>Project Construction Manager</p>	<p>Verify or dismiss presence of bats prior to construction or staging.</p> <p>Verify implementation of no-disturbance buffer, if necessary based on surveys.</p> <p>Verify compliance with construction of artificial bat roosts if found necessary.</p>	<p>Prior to staging and construction.</p> <p>If buffer required, monitor adequacy of buffer during construction in vicinity of active bat roosts, as applicable. If bat roosts to be destroyed, monitor adequacy of artificial roosts at least 2 weeks prior to site disturbance.</p>	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.C Biological Resources (cont.)					
<p>e) If known bat roosting habitat is to be destroyed during tree removal activities, artificial bat roosts shall be constructed at least two weeks prior to such disturbance, in an undisturbed area of the property, at least 250 feet from any ongoing or future activities. The design and location of the artificial bat roost(s) shall be determined by a qualified bat biologist.</p>					
<p>Mitigation Measure BIO-3a: (Applies to Phases I-IV) No more than two weeks in advance of any tree or shrub pruning, removal, ground-disturbing activity, or other construction activity that will commence during the breeding season (February 1 through August 31), a qualified wildlife biologist shall conduct pre-construction surveys of all potential nesting habitat in the vicinity of the planned activity.</p> <p>If construction activities for the project cease for a period of seven days or longer, or if construction does not begin within the immediate area within seven days of the initial pre-construction surveys, the qualified wildlife biologist shall conduct another pre-construction survey.</p> <p>Pre-construction surveys are not required for construction activities scheduled to occur during the non-breeding season (August 31 through January 31). Construction activities commencing during the non-breeding season and continuing into the breeding season do not require surveys (as it is assumed that any breeding birds taking up nests would be acclimated to project-related activities already under way).</p> <p>If active nests are found on the site during construction, construction shall be temporarily halted and the consultation with the State Department of Fish and Wildlife will be required before re-commencing construction activities. Nests initiated during construction activities would be presumed to be unaffected by the activity, and a buffer zone around such nests would not be necessary. However, a nest initiated during construction cannot be moved or altered and the nests shall be clearly identified and the immediate area fenced to prevent destruction.</p>	<p>Project Construction Manager, Qualified District Biologist, in consultation with CDFW, if necessary.</p>	<p>Project Construction Manager</p>	<p>Verify completion of surveys, as applicable and if necessary based on scheduling.</p>	<p>No more than two weeks prior to ground-disturbing activities, if necessary and based on project scheduling. Refer to Mitigation Measure BIOLOGY-2b if active nests found during pre-construction surveys.</p>	
<p>Mitigation Measure BIO-3b: If active nests are found during pre-construction surveys, the results of the surveys shall be discussed with the CDFW and avoidance procedures shall be adopted, if necessary, on a case-by-case basis. In the event that an active nest is found, construction in the vicinity would not be initiated until avoidance measures are adopted. Avoidance measures shall</p>	<p>Project Construction Manager and Qualified District Biologist.</p>	<p>Project Construction Manager</p>	<p>Verify at conclusion of pre-construction surveys. Verify consultation with CDFW and implementation of buffer zones, as needed.</p>	<p>No more than two weeks prior to ground-disturbing activities, if necessary and</p>	

**TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.C Biological Resources (cont.)					
<p>include construction buffer areas (up to several hundred feet in the case of raptors), relocation of birds, or seasonal avoidance, as needed. If buffers are created, a no-disturbance zone shall be created around active nests for the remainder of the breeding season, or until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted shall take into account factors such as the following:</p> <p>a) Noise and human disturbance levels at the project site and the nesting site at the time of the survey and the noise and disturbance expected during the construction activity;</p> <p>b) Distance and amount of vegetation or other screening between the project site and the nest; and</p> <p>c) Sensitivity of individual nesting species and behaviors of the nesting birds.</p>				based on project scheduling. Refer to Mitigation Measure BIOLOGY-2b if active nests found during pre-construction surveys.	
<p>Mitigation Measure BIO-4a: (Applies to major noise generating construction and/or demolition phases occurring within 200 feet of Creekside Marsh, as delineated in the Mitigation Monitoring and Reporting Program Attachment 1) To ensure project construction activities do not exceed existing ambient noise levels (as documented by long-term noise measurement LT-3, as shown in Figure 4.J-1R provided in the Final EIR, to be 60-69 dBA Leq, as stated on page 4.J-5 of the Draft EIR) at Creekside Marsh by over 10dBA:</p> <p>a) Project construction activities shall take place September-January, outside the clapper rail breeding season of February through August); or</p> <p>b) Consistent with Mitigation Measure NOI-2 in Section 4.K, <i>Noise</i>, noise reduction measures, including solid plywood fences, sound blankets, or other barriers with noise-dampening materials shall be constructed along portions of the western edge of the project site prior to initiation of construction to serve as noise attenuation barriers. Noise barriers shall be installed on the project site in all locations within 200 feet of the Corte Madera Creekside Marsh and grassland buffer (as delineated in Attachment 1 to the Mitigation Monitoring and Reporting Program and consistent with Figure 4.C-2R [in the Final EIR] supporting Mitigation Measure BIO-6). The barriers shall shield the marshes from major noise generating phases of demolition</p>	Project Construction Manager, Qualified District Biologist, in consultation with CDFW, if necessary.	Project Construction Manager	Verify first if construction would occur outside of clapper rail breeding season. If not, verify that noise reduction measures have been adequately implemented. Monitor noise levels during construction if any construction to occur within clapper rail breeding season to ensure no increases greater than 10dBA above current ambient levels.	Prior to and during all phases of construction	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.C Biological Resources (cont.)					
<p>and construction and will serve to attenuate noise emanating from the project site so any direct or reflected noise would not create increases greater than 10 dBA above current ambient levels in the marshes, where there may be breeding California clapper rails. The noise attenuation barrier shall be a minimum of 8 feet in height, but sufficient in height to reduce any noise from construction on upper stories or building rooftops.</p> <p>To ensure these noise attenuation barriers prevent significant impacts to breeding California clapper rails, a qualified biologist and noise technician shall periodically monitor noise levels at the edge of Creekside Marsh at least four times per month during the duration of construction within the breeding season.</p> <p>As an extra measure, the District shall retain a qualified biologist and noise monitor to monitor noise conditions at least four to five times during the month of January. The noise monitoring shall coincide with construction activities anticipated to produce the loudest noise. If sound levels are measured that exceed 10 dBA above ambient noise conditions, construction shall be temporarily halted and the contractor shall assess whether other work that would not exceed this threshold can be conducted during the phase of work. If no other construction can occur, work shall not re-commence until consultation with USFWS and CDFW¹ occurs.</p> <p>¹ Previously "California Department of Fish and Game" or "CDFG" at the time the Draft EIR was published. This revision is made throughout only where it affects mitigation measures and current discussion in this Final EIR.</p> <p>[See Attachment 1 to this MMRP.]</p>					
Mitigation Measure BIO-4b: Implement Mitigation Measure NOI-2.	See Mitigation Measure NOI-2.				
<p>Mitigation Measure BIO-6a: (Applies to Phases I-IV) Prior to construction initiation for each project phase, the project applicant shall prepare a map indicating the size and species of trees to be removed and retained. In addition, the project applicant shall do all of the following:</p> <p>a) Prior to the start of any clearing, stockpiling, excavation, grading, compaction, paving, change in ground elevation, or construction, preserved trees that occur adjacent to, or within, project construction shall be identified as preserved and clearly delineated by constructing short post and plank walls, or other protective fencing material, at the dripline of each tree.</p>	Project Construction Manager and District Biologist/Arborist	County Planning Division	Verify completion of map prior to construction. Verify compliance during construction	Prior to construction and during construction.	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.C Biological Resources (cont.)					
<p>b) The delineation markers shall remain in place for the duration of the work.</p> <p>c) Where proposed development or other site work must encroach upon the dripline of a preserved tree, special construction techniques shall be required to allow the roots of remaining trees within the project site to breathe and obtain water (examples include, but are not limited to, use of hand equipment for tunnels and trenching, and/or allowance of only one pass through a tree's dripline). Tree wells or other techniques may be used.</p> <p>d) Excavation adjacent to any trees, when permitted, shall be in such a manner that shall cause only minimal root damage.</p> <p>e) The following shall not occur within the dripline of any retained tree: parking; storage of vehicles, equipment, machinery, stockpiles of excavated soils, or construction materials; or dumping of oils or chemicals.</p>					
<p>Mitigation Measure BIO-6b: (Applies to Phases I-IV): All pruning activities of preserved trees shall be performed by a certified arborist.</p> <p>a) No more than 25 percent of a tree's canopy shall be removed during pruning activities of retained trees.</p> <p>b) If any protected preserved tree is damaged, then the project applicant shall replace the tree as required by the County.</p> <p>c) All removed trees that meet the criteria of a protected tree shall be replaced with the same species removed as required by the County.</p>	Project Construction Manager and District Biologist/Arborist	County Planning Division	Verify completion of map prior to construction. Verify compliance during construction	Prior to construction and during construction	
<p>Mitigation Measure BIO-6c: (Applies to Phases I-IV): The project applicant shall develop and implement a five-year monitoring program for any required replacement plantings. Applicable performance standards may include, but are not limited to: 75 percent survival rate of replacement plantings; absence of invasive plant species; and self-sustaining trees at the end of five years.</p>	Project Construction Manager and District Biologist/Arborist	County Planning Division	Annually, up to five years after occupancy of the Hospital Replacement Building	Prior to installation of landscaping	
<p>Mitigation Measure BIO-6d: (Applies to Phases I-IV): All tree removal and pruning activities shall include measures to avoid the spread of SOD. Such measures may include, but are not limited to the following:</p>	Project Construction Manager and District Biologist/Arborist	Project Construction Manager and District Biologist/Arborist		During landscape implementation.	

**TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.C Biological Resources (cont.)					
<p><i>Before working:</i></p> <ul style="list-style-type: none"> a) As a precaution against spreading the pathogen, clean and disinfect pruning tools after use on confirmed or suspected infested trees or in known infested areas. Sanitize tools before pruning healthy trees or working in pathogen-free areas. Clean chippers and other vehicles of mud, dirt, leaves, organic material, and woody debris before leaving a site known to have SOD and before entering a site with susceptible hosts. b) Inform crews about the arboricultural implications of SOD and sanitation practices when they are working in infested areas. c) Provide crews with sanitation kits. (Sanitation kits should contain the following: Chlorine bleach (10/90 mixture bleach to water) or Clorox Clean-up® or Lysol®, scrub brush, metal scraper, boot brush, and plastic gloves). d) Sanitize shoes, pruning gear, and other equipment before working in an area with susceptible species. <p><i>While working:</i></p> <ul style="list-style-type: none"> a) When possible, work on SOD-infected and susceptible species during the dry season (June-October). When working in wet conditions, keep equipment on paved, graveled, or dry surfaces and avoid mud. b) Work in disease-free areas before proceeding to infested areas. c) If possible, do not collect soil or plant material (wood, brush, leaves, and litter) from host trees in the quarantine area. Within the quarantine area, host material (e.g., wood, bark, brush, chips, leaves, or firewood) from tree removals or pruning of symptomatic or non-symptomatic host plants should remain onsite to minimize pathogen spread. <p><i>After working:</i></p> <ul style="list-style-type: none"> a) Use all reasonable methods to sanitize personal gear and crew equipment before leaving a SOD infested site. Scrape, brush, and/or hose off accumulated soil and mud from clothing, gloves, boots, and shoes. Remove mud and plant debris by blowing out or power washing chipper trucks, chippers, bucket trucks, fertilization and soil aeration equipment, cranes, and other vehicles. b) Restrict the movement of soil and leaf litter under and around infected trees as spores may be found there. 					

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.C Biological Resources (cont.)					
<p>c) Tools used in tree removal/pruning may become contaminated and should be disinfected with Lysol® spray, a 70 percent or greater solution of alcohol, or a Clorox® bleach solution (1 part Clorox® bleach to 9 parts water or Clorox Cleanup ®).</p> <p>Implementation of Mitigation Measures BIO-6a through BIO-6d would reduce impacts to trees protected under the Marin County Tree Preservation Ordinance.</p>					
4.D Cultural and Paleontological Resources					
<p>Mitigation Measure CUL-1: The project applicant shall conduct the following:</p> <ul style="list-style-type: none"> • Pre-demolition photo-documentation, a report, and as-built drawings of the gardens in accordance with the Historic American Landscape Survey (HALS) standards. This documentation would include a HALS report in either the short form format or a longer outline format and a measured drawing of the existing conditions. A copy of all of the HALS documentation shall be provided to the Lawrence Halprin archives at the University of Pennsylvania and the Anne T. Kent California Room in the Marin County Free Library. No additional historic registries local to Marin County could be identified. - Installation of a public plaque or element that commemorates the work of Lawrence Halprin on this site. • Design of a new garden that commemorates Lawrence Halprin's design contributions: <ul style="list-style-type: none"> - Within a new garden, recognize Halprin's use of hardscape materials, landscape grading and planting to evoke local, natural elements and delineate space. The garden would not relocate or mimic Halprin's gardens, but could possibly reuse some materials and/or incorporate similar materials in its construction, particularly plant materials. - Locate the new garden in view of the Corte Madera Marsh to maintain the connection of the hospital landscape to the broader natural setting. 	<p>Project Construction Manager, District Cultural Resource Historical, and District Landscape Architect</p>	<p>County Planning Division and Project Construction Manager</p>	<p>Submittal of HALS documentation to parties/locations specified,</p> <p>Upon installation of a public plaque or element.</p> <p>New garden designs shall be reviewed and approved before the start of construction.</p>	<p>Prior to any construction that alters the Halprin Gardens.</p>	

**TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.D Cultural and Paleontological Resources (cont.)					
<ul style="list-style-type: none"> • Incorporate a more private garden within the hospital landscape for the purpose of respite or reflection within a natural setting. The intent would be to recall and respect rather than mimic Halprin's work. The garden could also incorporate elements that reference Halprin and his influence. • Marin General Hospital will seek donations to commemorate Lawrence Halprin's influence on the design of the Marin General Hospital Landscape; donations could fund an intern to work with the Halprin archivist at the University of Pennsylvania or similar relevant efforts for a one-year time duration. • Document other Bay Area designs of Halprin's from this early period in his career. This documentation would include a list of his projects, plans when available, project locations, a written description identifying the project types and whether they were public or private commissions and photos, when possible, showing the overall character of the designs. The research could serve as an important resource for the local community and could be combined with HALS documentation, with copies sent to the University of Pennsylvania, the Marin County Free Library, or other institutions. <p>Demolition or destruction of a historical resource, cannot be mitigated below a level of significance, however this mitigation would add to the body of knowledge about Lawrence Halprin's work and would provide further documentation of this particular design.</p>					
<p>Mitigation Measure CUL-2: A Secretary of the Interior-qualified archaeologist and a Native American monitor shall be present during ground-disturbing activities in the vicinity of Buildings 1, 2, and 3, and the Halprin Gardens. During the course of the monitoring, the archaeologist may adjust the frequency of the monitoring—from continuous to intermittent—based on observed conditions (i.e. artificial fill) and professional judgment regarding the potential to impact resources. Prior to ground disturbing activities, an archaeological monitoring plan shall be developed that includes:</p> <ul style="list-style-type: none"> • Training program for all construction personnel involved in site disturbance activities; • Qualifications of person responsible for conducting monitoring activities, including Native American monitors; 	<p>Project Construction Manager and Secretary of the Interior qualified archaeologist and Native American monitor</p>	<p>Project Construction Manager</p>		<p>Prior to construction and during construction.</p>	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.D Cultural and Paleontological Resources (cont.)					
<ul style="list-style-type: none"> • The required format and content of monitoring reports, assessment, designation and mapping of sensitive cultural resource areas on final project maps; • Person(s) responsible for overseeing and directing the monitors; • Schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports; • Physical monitoring boundaries; • Protocol for notifications in case of encountering of cultural resources, as well as methods of dealing with the encountered resources (e.g., collection, identification, curation); • Methods to ensure security of cultural resources sites; • Protocol for notifying local authorities (i.e., Sheriff, Police) should site looting and other illegal activities occur during construction. <p>If cultural resources are encountered during construction, all activity in the vicinity of the find shall cease until it can be evaluated by a qualified archaeologist and a Native American representative. Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. If the archaeologist and Native American representative determine that the resources may be significant, they will notify the County. An appropriate treatment plan for the resources shall be developed and shall be submitted to the County for review and approval. The archaeologist shall consult with Native American representatives in determining appropriate treatment for prehistoric or Native American cultural resources.</p> <p>In considering any suggested mitigation proposed by the archaeologist and Native American representative, the County will determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) will be instituted. Work may proceed in other parts of the site while mitigation for cultural resources is being carried out.</p>	Project Construction Manager and Secretary of the Interior qualified archaeologist and Native American monitor	Project Construction Manager		Prior to construction and during construction.	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.D Cultural and Paleontological Resources (cont.)					
<p>Mitigation Measure CUL-3: If fossil or fossil bearing deposits are discovered during construction, excavations within 50 feet of the find shall be temporarily halted or diverted until the discovery is examined by a qualified paleontologist (in accordance with Society of Vertebrate Paleontology standards). The paleontologist shall document the discovery as needed, evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA <i>Guidelines</i> Section 15064.5. The paleontologist shall notify Marin County to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the County determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project, based on the qualities that make the resource important. The excavation plan will include identification of an institution willing and able to accept fossil specimens; and emergency discovery procedures, including survey and record keeping of fossil-finds, bulk sediment sample collection and processing, specimen identification, disposition, and museum curation of any specimens and data recovered. The excavation plan shall be submitted to the County for review and approval prior to implementation.</p>	Project Construction Manager and Contractor	Project Construction Manager		During construction.	
<p>Mitigation Measure CUL-4: If potential human remains are encountered, the contractor will halt work in the vicinity of the find and contact the Marin County coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the coroner determines the remains are Native American, the coroner will contact the Native American Heritage Commission. As provided in PRC §5097.98, the Native American Heritage Commission will identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent will make recommendations for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.</p>	Project Construction Manager and Contractor	Project Construction Manager		During construction.	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.F Greenhouse Gases and Climate Change					
<p>Mitigation Measure GHG-2: The Project shall include the following features to reduce energy consumption that could reduce the GHG emissions associated with the proposed project.</p> <ul style="list-style-type: none"> • <i>Additional Transportation Demand Management Strategies.</i> The project applicant shall implement the following Transportation Demand Management (TDM) program strategies, in addition to maintaining the existing Marin General Hospital valet parking shuttle transit service, onsite carpool parking spaces, and pre-tax transit expense reimbursements for employees: <ol style="list-style-type: none"> a) Employee Commute Program. Develop and implement a Marin General Hospital employee commute program with specific actions and goals to provide on-site information to employees about commute alternatives to and from Marin General Hospital. Specific actions shall include the administration of an annual commute behavior survey, implementation of expanded commuter benefit programs, and periodic incentives to promote and encourage commute alternatives to driving alone. Designate an employee transportation coordinator (ETC) to facilitate the program; b) Carpool and Vanpool Matching. Provide easy access to carpool and vanpool matching for Marin General Hospital employees, working together with the Metropolitan Transportation Commission (MTC), <i>511 Rideshare</i>, Transportation Authority of Marin (TAM), or other agency or organization with this objective. Provide a rideshare matching information bulletin board, website our other effective means of facilitating coordination among potential employees interested in ridesharing; c) Bicycle Facilities. Provide employee access to showers and changing facilities and provide additional secured bicycle parking facilities to encourage bicycle use by Marin General Hospital employees; d) Emergency Ride Home. Participate in the countywide Emergency Ride Home (ERH) program administered by TAM for employees who use commute alternatives to driving alone; e) Expanded Preferential Parking Program. Designate an increased ratio of on-site parking for carpool vehicles (exclusive of elderly and handicapped parking). (The current 	<p>Project Construction Manager and Contractor, in coordination with the Metropolitan Transportation Commission (MTC), <i>511 Rideshare</i>, Transportation Authority of Marin (TAM), or other agency or organization with this objective.</p>	<p>Marin Healthcare District ETC.</p>	<p>Submit the documentation outlined to County Planning to demonstrate compliance. District consultants, in coordination with the agencies or organizations with "Implementation Responsibility", shall conduct the necessary verifications of each strategy.</p>	<p>At completion of the Hillside Parking Structure (End of Phase I), and annually thereafter: TDM strategies "a", "b", "d" and "f". Except for the administration of an annual commute behavior survey with TDM strategy "a", each of these strategies are administrative and viable for implementation during construction.</p> <p>One calendar year after completion of the Hillside Parking Structure (Phase I + 1 Year): Administration of an annual commute behavior survey with TDM strategy "a". This duration allows time for the Employee Commute Program to be established and used before surveying.</p> <p>Upon patient occupancy of the Hospital Replacement Building (End of Phase IV): TDM strategies "c" and "e". These TDM</p>	

**TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.F Greenhouse Gases and Climate Change (cont.)					
<p>ratio is approximately one per 120 total on-site spaces – five of 605 spaces.) Clearly indicate the location of the preferential parking spaces using appropriate signage;</p> <p>f) Vanpool Program Support. Support and promote the development of employee vanpools countywide, in cooperation with MTC, 511 <i>Rideshare</i>, TAM, and other agencies offering incentive programs, as appropriate.</p> <p><i>Implementation Timeframes.</i> The project applicant shall initially submit to the County Department of Public Works (or other department or agency designated by the County) documentation sufficient to demonstrate implementation and effectiveness of each of the aforementioned strategies within the timeframes below. Also, each of the strategies, except as specified below, shall be extended to include employees of the Ambulatory Services Building when that building is operational.</p> <ul style="list-style-type: none"> - At completion of the Hillside Parking Structure (End of Phase I), and annually thereafter: TDM strategies “a” (<i>Employee Commute Program</i>), except the administration of an annual commute behavior survey; “b” (<i>Carpool and Vanpool Matching</i>); “d” (<i>Emergency Ride Home</i>); and “f” (<i>Vanpool Program Support</i>). Except for the administration of an annual commute behavior survey with TDM strategy “a”, each of these strategies are administrative and viable for implementation during construction. - One calendar year after completion of the Hillside Parking Structure (Phase I + 1 Year): Part of TDM strategy “a” (<i>Employee Commute Program</i>) to administer an annual commute behavior survey. This duration allows time for the Employee Commute Program to be established and used before surveying. - Upon completion of the Ambulatory Services Building (End of Phase III): Part of TDM strategy “c” (<i>Bicycle Facilities</i>) to provide additional secured bicycle parking facilities); and TDM strategy “e” (<i>Expanded Preferential Parking Program</i>). - Upon patient occupancy of the Hospital Replacement Building (End of Phase IV): Part of TDM strategy “c” (<i>Bicycle Facilities</i>) to provide employee access to showers 				<p>strategies involve establishing facilities in the hospital and the parking areas, therefore this timing allows completion of these project components.</p>	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.F Greenhouse Gases and Climate Change (cont.)					
<p>and changing facilities for expanded bicycle facilities. This TDM strategy involves establishing facilities in the hospital and therefore would not be available until after the Hospital Replacement Building is operational.</p> <p><i>Reduce Waste Generation.</i> MGH shall include waste management and recycling programs to minimize solid waste generation. Such programs are assumed to minimize waste production. The applicant shall implement waste management and recycling programs to minimize solid waste generation. At a minimum, the applicant shall provide employee information, instructional signage at waste areas; and designated recycling bins to promote avoiding products with excessive packaging, recycling, buying refills instead of new items, separating food and landscaping waste (if composting such waste is elected for the program), and using rechargeable batteries, wherever feasible and consistent with hospital operations and regulations. For modeling purposes, GHG emissions associated with energy associated with landfilling of waste were assumed to be reduced by 10 percent, consistent with and expected reduction in waste generation.</p>					
Mitigation Measure GHG-4: Implement Mitigation Measure GHG-2.		See Mitigation Measure GHG-2.			
4.J Noise					
<p>Mitigation Measure NOI-2:</p> <p>a) Pursuant to Sections 6.70.030(5) and 6.70.040 of the Marin County Municipal Code, restrict noise-generating activities at the construction site or in areas adjacent to the construction site to the hours of 7:00 a.m. to 6:00 p.m., Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturday. Construction will be prohibited on Sundays and holidays. Loud noise-generating construction-related equipment (e.g., backhoes, generators, jackhammers) can be maintained, operated, or serviced at a construction site for permits administered by the community development agency from 8:00 a.m. to 5:00 p.m. Monday through Friday only.</p> <p>b) If during construction it is determined that construction noise disrupts on-going hospital operations for workers of patients within patient rooms or existing medical offices, the project shall erect temporary noise control blanket barriers along existing hospital building facades facing the construction area. This mitigation shall be coordinated with Mitigation Measure BIO-4a. The specific location and height of barriers would depend on the extent of the</p>	Project Construction Manager and Contractor	Project Construction Manager	Verify at time of finalizing contract specifications. Verify compliance during construction.	At time of specifications being provided to contractor and ongoing during construction.	

**TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.J Noise (cont.)					
<p>problem indoors. Noise control blanket barriers can be rented and quickly erected to reduce the intrusiveness of construction noise indoors. If construction noise is not problematic and does not disrupt hospital or medical office operations, the temporary noise barriers would not be necessary.</p> <p>c) Where it is feasible to block the line-of-sight to construction activities, construct solid plywood fences (minimum eight feet in height either around the construction zone or at the commonproperty line) to shield adjacent residences or other noise-sensitive land uses prior to major noise generating phases of demolition and construction;</p> <p>d) Shield adjacent sensitive uses from stationary equipment with individual noise barriers or partial acoustical enclosures;</p> <p>e) Relocate patient rooms and sensitive medical offices away from areas undergoing construction, as feasible and practical;</p> <p>f) Use manually adjustable or self-adjusting back-up alarms to increase or decrease the volume of the alarm based on background noise levels. Installation and use of the back-up alarms will be consistent with OSHA (Occupational Safety and Health Administration) regulations;</p> <p>g) Utilize 'quiet' models of air compressors and other stationary noise sources where technology exists;</p> <p>h) Equip all internal combustion engine-driven equipment with intake and exhaust mufflers, which are in good condition and appropriate for the equipment;</p> <p>j) Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from residences or noise-sensitive land uses;</p> <p>k) Locate staging areas and construction material areas as far away as possible from residences or noise-sensitive land uses;</p> <p>l) Route all construction traffic to and from the project site via designated truck routes where possible. Prohibit construction related heavy truck traffic in residential areas where feasible;</p> <p>m) Control noise from construction workers' radios to a point that they are not audible at existing residences bordering the project site;</p>					

**TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.J Noise (cont.)					
<p>n) Conduct sensitivity training to inform construction personnel about the requirements of the construction noise control plan and about methods to reduce noise;</p> <p>o) Prohibit all unnecessary idling of internal combustion engines;</p> <p>p) Notify all adjacent business, residences, and noise-sensitive land uses of the construction schedule in writing;</p> <p>q) Designate a “disturbance coordinator” who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would require that reasonable measures warranted to correct the problem be implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.</p>					
Mitigation Measure NOI-3: Implement Mitigation Measure NOI-2.	See Mitigation Measure NOI-2.				
<p>Mitigation Measure NOI-4a: During final design of the project, conduct an acoustical analysis to ensure that noise resulting from the rooftop mechanical equipment on the Hospital Replacement Building complies with applicable General Plan policies. The acoustical analysis would calculate noise levels resulting from the selected equipment at the nearest sensitive receiving land uses, assess noise levels relative to applicable standards, and provide feasible and reasonable recommendations to control noise levels in accordance with the applicable limits. Particular attention will be given to the chiller room enclosure and cooling towers. Additional noise control measures might include, but are not limited to, selection of quieter equipment, baffles, packaged sound attenuators, and noise barriers. The report will be completed and submitted to the building department prior to the issuance of building permits, and will be used to determine the added noise measures required.</p>	Project Construction Manager and Contractor	Project Construction Manager and Contractor	Verify completion of analysis	Prior to construction and issuance of building permits.	
<p>Mitigation Measure NOI-4b: During final design of the project, conduct an acoustical analysis to ensure that noise resulting from the operation of the emergency generators is reduced to 85 dBA or less (or a lower limit if necessary to minimize interference with hospital operations) in the ambulance bay. The report will be completed and submitted to the building department prior to the issuance of building permits related to installation of the generators</p>	Project Construction Manager and Contractor	Project Construction Manager and Contractor	Verify completion of analysis	Prior to construction and issuance of building permits.	

TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.J Noise (cont.)					
<p>in the West Wing, and will provide feasible and reasonable recommendations as needed to control noise levels in accordance with the applicable limits. Additional noise control measures might include, but are not limited to, high-performance (hospital or critical grade) mufflers, additional banks of silencers, or acoustical louvers. The additional noise control would also reduce noise levels in the surrounding community during testing or emergency operations.</p>					
4.M Transportation and Circulation					
<p>Mitigation Measure TRA-2a: To improve vehicle sight distance from the planned parking garage right-turn only westbound driveway onto Bon Air Road, no vehicle parking shall be allowed on the east side of Bon Air Road between the garage's outbound only driveway and the planned inbound only ambulance driveway located to the south (which would entail removal of two parking spaces, in addition to the two or three parking spaces removed to accommodate the new driveways). In addition, planned trees and shrubbery shall be removed in the landscaped areas both south and between the two driveways to allow for improved vehicle sight distance.</p> <p>These measures will result in reducing potential vehicle sight distance problems to a less-than-significant level.</p>	Project Construction Manager and Contractor	County Public Works			
<p>Mitigation Measure TRA-2b: To improve traffic flow and reduce potential queuing impacts at the main full-access southern driveway, it is recommended that a double yellow lane striping shall be installed from the driveway's raised median around the internal curb northbound into the drive aisle to prevent queued vehicles from potentially blocking inbound traffic to the site.</p>	Project Construction Manager and Contractor				
<p>Mitigation Measure TRA-3: Implement Mitigation Measure TRA-2a (improve vehicle sight distance from the planned parking garage right-turn only westbound driveway onto Bon Air Road).</p>	See Mitigation Measure TRA-2a.				
<p>Mitigation Measure TRA-7: If the proposed Highway 101 Greenbrae/Twin Cities Corridor Improvement project circulation improvement for Sir Francis Drake Boulevard (eastbound through lane at Eliseo Drive) is deemed feasible, the project applicant shall contribute a proportional "fair share" contribution towards that improvement, based on the project's percent contribution to the total cumulative year 2035 plus project volume at the intersection.</p>	Project Construction Manager and Contractor				

**TABLE B-1 (Continued)
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Implementation Responsibility	Monitoring Responsibility	Monitoring and Reporting Action	Monitoring Schedule	Verification of Compliance
4.M Transportation and Circulation (cont.)					
<p>The project applicant shall contribute a proportional “fair share” towards the upgrade of A70 traffic signal controllers along Sir Francis Drake Boulevard at the affected intersections at the Wolfe Grade, La Cuesta, and Eliseo Drive intersections based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections.</p> <p>The project applicant shall contribute a proportional “fair share” towards an engineering study to evaluate the potential for increasing the westbound left-turn lane storage based on the percentage of p.m. peak-hour vehicle trips contributed to these intersections the Bon Air Road/Sir Francis Drake Boulevard intersection.</p> <p>There are no additional feasible measures to mitigate the project impact at the other identified intersections to a less-than-significant level.</p>					

ATTACHMENT 1

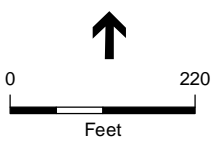
200 foot Clapper Rail Noise Buffer



SOURCE: USGS 2013 Microsoft Corporation

Marin General Hospital . 210606

MMRP Attachment 1 - Mitigation Measure BIO-4a
200 foot Clapper Rail Noise Buffer



APPENDIX C

Tree Inventory Detail

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TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
1	Coast live oak (<i>Quercus agrifolia</i>)	13.4	1	5	5	3	10' from entrance curb; foot path adjacent to tree.	366	Measurement to face of existing curb is 10.2 feet to south parking lot curb face is 23.0 feet; measurement to corner parking lot first stall is 18.2 feet.
2	Coast live oak (<i>Quercus agrifolia</i>)	10.5	1	4	4	3	Girdle roots	367	Measurement to driveway curb is 17.9 feet; to corner of first stall of parking lot is 20.3 feet.
3	Coast live oak (<i>Quercus agrifolia</i>)	9.1	1	4	4	3	Crowded by pines; crossing branches w/pine.	368	Directly opposite to parking space corner & is 9.5 feet from parking lot corner; measurement to driveway curb face is 27.0 feet.
4	Monterey pine (<i>Pinus radiata</i>)	21.4	1	3	2	1	J-butt; girdle roots	369	Measurement to curb of the parking lot parking space is 24.6 feet; measurement to driveway curb is 26.0 feet.
5	Monterey pine (<i>Pinus radiata</i>)	25.4	1	3	3	1	Girdle roots; surface roots.	370	Measurement to parking lot curb is 15.2 feet; measurement to the driveway curb is 38.4 feet.
6	Coast live oak (<i>Quercus agrifolia</i>)	12.8	1	4	4	3	A lot of fine deadwood; No SOD.	371	Distance to driveway curb is 43.2 feet; 32.3 feet to parking curb.
7	Coast live oak (<i>Quercus agrifolia</i>)	25.1	1	4	4	3	Heavy girdle roots; less than 3' from retaining wall.	372	6.3 feet from parking lot curb; 35.7 feet from corner of the first northmost stall of the parking lot.
8	Coast live oak (<i>Quercus agrifolia</i>)	34.5	4	4	4	3	Small tree; No SOD.	373	33.3 feet from curb face.
9	Coast live oak (<i>Quercus agrifolia</i>)	11.0	1	4	4	3	n/a.	374	19.4 feet from parking lot curb.
10	Monterey pine (<i>Pinus radiata</i>)	25.2	1	2	3	1	WPGR (branches w/cankers on ground)	375	26.6 feet from the road curb.
11	Mexican Fan Palm (<i>W. robusta</i>)	12"	1	5	5	3	Transplantable	376	4.4 feet from curb face of parking lot.
12	Mexican Fan Palm (<i>W. robusta</i>)	12"	1	5	5	3	Transplantable	377	5.0 feet from curb face of parking lot.
13	Monterey pine (<i>Pinus radiata</i>)	32.5	2	2	1	1	Approx. 3.5' from asphalt path; OEL over walk/path; WPGR	378	19.6 feet from road curb face.
14	Monterey pine (<i>Pinus radiata</i>)	28.5	3	3	3	1	Suppressed; small tree.	379	18.0 feet from curb face.
15	Monterey pine (<i>Pinus radiata</i>)	26.3	1	3	2	1	SPM @ acute angle crotches; codominant stems; RTB	380	38.1 feet from road curb face.
16	Coast live oak (<i>Quercus agrifolia</i>)	11.5	1	3	4	3	Canopy is chlorotic.	381	10.8 feet from parking lot curb face.
17	Monterey pine (<i>Pinus radiata</i>)	21.5	1	2	2	1	WPGR; dieback; targets sidewalk/path.	382	19.0 feet from road curb face.
18	Coast live oak (<i>Quercus agrifolia</i>)	9.0	1	4	4	3	No SOD.	383	31.7 feet from parking lot curb face.
19	Coast live oak (<i>Quercus agrifolia</i>)	12.1	1	4	4	3	No SOD.	384	18.2 feet from parking lot curb face.
20	Monterey pine (<i>Pinus radiata</i>)	23	1	3	3	1	OEL; thin canopy; girdle roots	385	13.6 feet from parking lot curb face.
21	Monterey pine (<i>Pinus radiata</i>)	25.4	1	3	3	1	WPGR; 1' from sidewalk/path.	386	17.2 feet from road curb face.
22	Monterey pine (<i>Pinus radiata</i>)	23.4	1	2	3	1	Small tree; 1.5' from sidewalk/path.	387	17.6 feet from curb face.
23	Monterey pine (<i>Pinus radiata</i>)	25.4	1	3	2	1	Crossing branches; trunk defect; RTB; girdle roots	388	17.8 feet from road curb face.

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TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
24	Monterey pine (Pinus radiata)	18.9	1	2	2	1	WPGR; crossing branches; RTB; less than 1' from sidewalk.	389	18.1 feet from road curb face; 9.4 feet from parking lot pavement. There is no curb.
25	Monterey pine (Pinus radiata)	20.4	1	2	2	1	WPGR; SPM; canker on trunk; no growing space.	390	18.2 feet from road curb face; 1.5 feet from the paved parking lot surface.
25A	Coast live oak (Quercus agrifolia)	9	1	4	4	4	Crowded	391	33 feet south of T-25.
25B	Coast live oak (Quercus agrifolia)	8.5	1	4	4	4		392	38 feet south of T-25.
26	Monterey pine (Pinus radiata)	17.1	1	1	1	1	HAZARD TREE	393	14.3 feet from parking lot; 19.2 feet from road curb.
27	Monterey pine (Pinus radiata)	21.0	1	4	2	1	2' from walk/path; acute angle crotches.	394	3.2 feet from walk; 32 feet to parking lot; 19.9 feet to road curb.
27B	Monterey pine (Pinus radiata)	16.7	1	1	1	1	Stem WPGR canker; HAZARD TREE	116, 117	3.0 feet from walk; 5.7 feet to the road.
27C	Monterey pine (Pinus radiata)	19.7	1	2	2	1	WPGR; dieback	118, 119	
28	Alder (c.f. Alnus rhombifolia)	12.1	1	4	4	3	Within Manzanita; Tag @ 3.5' above grade.		
29	Redwood (Sequoia sempervirens)	12.6	1	4	4	3	1.5' from asphalt path.		
30	Redwood (Sequoia sempervirens)	12.8	1	2	3	2	Chlorotic canopy; suppressed.		
31	Redwood (Sequoia sempervirens)	10.4	1	3	3	2	Chlorotic canopy; suppressed.		
32	Redwood (Sequoia sempervirens)	18.8	1	4	4	4	More vigorous than previous redwoods.		
33	Redwood (Sequoia sempervirens)	15.8	1	2	1	1	Dead top; tree in decline. (*Poisoned? - shepard's crooking)		
34	Redwood (Sequoia sempervirens)	16.5	1	3	4	3	Chlorotic foliage.		
35	Redwood (Sequoia sempervirens)	32.1	2	3	3	3	Chlorotic foliage; codominant stems; small growing space.		
36	Redwood (Sequoia sempervirens)	15.5	1	3	4	3	Small growing space.		
37	Redwood (Sequoia sempervirens)	28	1	3	3	2	Half of canopy is displaying stress.		
38	Redwood (Sequoia sempervirens)	21.2	1	4	4	3	n/a.		
39	Blue gum (Eucalyptus globulus)	21.1	1	3	2	1	Targets sidewalk and road.	395	8.0 feet to existing sidewalk
40	Blue gum (Eucalyptus globulus)	29.4	1	3	2	1	Targets sidewalk and road.	396	2 feet from existing sidewalk
40A	Blue gum (Eucalyptus globulus)	10.0	3	2	1	1	Regrowth; diameters: 5.0", 2.0", 3.0" DBH	152, 153	5.4 feet to existing sidewalk
41	Blue gum (Eucalyptus globulus)	12.3	1	2	3	1	Suppressed.	397	10.5 feet to existing sidewalk
42	Monterey pine (Pinus radiata)	36.7	1	3	2	1	Massive & overmature	398	31 feet from southwest edge of road; 50 feet existing curb.
43	Blue gum (Eucalyptus globulus)	50.4	1	3	2	1	Massive & overmature	156, 157	
43A	Monterey cypress (Cupressus macrocarpa)	6.7	1	3	3	3		158, 159	
43B	Monterey cypress (Cupressus macrocarpa)	5.7						160, 161	
43C	Monterey cypress (Cupressus macrocarpa)	10.6	2	3	3	5	5.5" & 5.1" DBH	162, 163	26.9 feet to entrance curb
43D	Coast live oak (Quercus agrifolia)	6.3	2	3	3	4	4.1" & 2.2" DBH	164, 165	26.0 feet to entrance curb
44	Blue gum (Eucalyptus globulus)	37	1	3	2	1	Massive & overmature		

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TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
45	Blue gum (Eucalyptus globulus)	41.5	1	3	2	1	Massive & overmature		
46	Blue gum (Eucalyptus globulus)	74	2	3	2	1	Massive & overmature		
47	Blue gum (Eucalyptus globulus)	31.5	1	3	2	1	Massive; suppressed.		
48	Blue gum (Eucalyptus globulus)	88	3	3	2	1	Massive & overmature		
49	Blue gum (Eucalyptus globulus)	33	1	3	2	1	Massive & overmature		
50	Blue gum (Eucalyptus globulus)	49.3	1	3	2	1	Massive, overmature; tall and leggy.		
51	Blue gum (Eucalyptus globulus)	62.9	1	3	2	1	Massive & overmature		
52	Blue gum (Eucalyptus globulus)	48.0	1	3	2	1	Massive & overmature		
53	Blue gum (Eucalyptus globulus)	63.3	1	3	2	1	Massive & overmature		
54	Italian Stone Pine (c.f. Pinus pinea)	13.3	1	2	2	1	Decline.		
55	Coast live oak (Quercus agrifolia)	10.5	2	4	4	3	Bark Staining - monitor.		
56	Coast live oak (Quercus agrifolia)	7.9	2	4	4	3	No SOD.		
57	Monterey pine (Pinus radiata)	16	1	2	3	1	Very thin canopy. Multi-stemmed toyon immediately adjacent.	407	13.0 feet to entrance curb.
58	Coast live oak (Quercus agrifolia)	20.6	1	5	4	3	No SOD.	406	7.8 feet to entrance curb.
59	Coast live oak (Quercus agrifolia)	15.1	1	4	4	3	Bark Staining - monitor; borers present.	405	18.0 feet to entrance curb.
60	Coast live oak (Quercus agrifolia)	10.7	1	2	3	2	3' from curb/road; SOD symptomatic.	404	3.0 feet to entrance curb.
61	Coast live oak (Quercus agrifolia)	6.5	2	3	4	3	No SOD.	403	8.0 feet to entrance curb.
62	Coast live oak (Quercus agrifolia)	7.6	1	2	3	2	SOD symptomatic.	402	21.6 feet entrance curb.
63	Coast live oak (Quercus agrifolia)	6.1	1	5	4	3	No SOD; fallen euc limb in canopy.	401	11.6 feet to entrance curb.
64	Coast live oak (Quercus agrifolia)	9.8	1	5	4	3	No SOD; End of euc peninsula.	400	17.0 feet to entrance curb.
65	Modesto Ash (Fraxinus velutina)	7.9	1	2	3	3	Combo lock box in tree; dieback in canopy; 1/2 of canopy remain.		
66	Modesto Ash (Fraxinus velutina)	7.6	1	4	3	2	Foliage low over parking space.		
67	Redwood (Sequoia sempervirens)	14.2	2	4	3	2	2 stems at grade.		
68	Redwood (Sequoia sempervirens)	19.3	3	4	2	1	Crown sprouts off old stump; cavity in root crown.		
69	Modesto Ash (Fraxinus velutina)	6.7	3	3	2	2	Leggy; dieback & deadwood.		
70	Modesto Ash (Fraxinus velutina)	12.0	1	3	2	1	Multi-stems @ common attachment; disrupt curb to parking lot.		
71	CA Fan Palm (Washingtonia filifera)	24.4	1	4	4	3	In parking lot island; mineral def.		
72	CA Fan Palm (Washingtonia filifera)	25.1	1	4	4	3	In parking lot island; mineral def.		
73	CA Fan Palm (Washingtonia filifera)	24.7	1	4	4	3	In parking lot island; mineral def.		
74	CA Fan Palm (Washingtonia filifera)	28.0	1	4	4	3	In parking lot island; mineral def.		
75	CA Fan Palm (Washingtonia filifera)	29.9	1	3	4	3	In parking lot island; mineral def.		
76	CA Fan Palm (Washingtonia filifera)	23.8	1	4	4	3	In parking lot island; mineral def.		
77	CA Fan Palm (Washingtonia filifera)	31.7	1	4	4	3	In parking lot island; mineral def.		

HEALTH STRUCTURAL CONDITION = 1 DEAD, 2 POOR, 3 FAIR, 4 GOOD, 5 EXCELLENT
 SUITABILITY FOR PRESERVATION: 1=POOR, 2 FAIR, 3=GOOD

INSPECTED BY: UFA, Inc.

TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
78	CA Fan Palm (<i>Washingtonia filifera</i>)	29.4	1	4	4	3	In parking lot island; mineral def.		
79	CA Fan Palm (<i>Washingtonia filifera</i>)	27.3	1	4	4	3	In parking lot island; mineral def.		
80	CA Fan Palm (<i>Washingtonia filifera</i>)	27.5	1	3	4	3	In parking lot island; mineral def.		
81	CA Fan Palm (<i>Washingtonia filifera</i>)	26.2	1	4	4	3	In parking lot island; mineral def.		
82	CA Fan Palm (<i>Washingtonia filifera</i>)	27	1	4	4	3	In parking lot island; mineral def.		
83	CA Fan Palm (<i>Washingtonia filifera</i>)	26	1	4	3	3	In parking lot island; mineral def.		
84	CA Fan Palm (<i>Washingtonia filifera</i>)	31.5	1	4	3	3	In parking lot island; mineral def.		
85	CA Fan Palm (<i>Washingtonia filifera</i>)	28.3	1	4	3	3	In parking lot island; mineral def.		
86	Redwood (<i>Sequoia sempervirens</i>)	19.5	1	4	4	3	Tree is apart of a stand of 5 trees.		
87	Redwood (<i>Sequoia sempervirens</i>)	14.2	1	4	4	3	Tree is apart of a stand of 5 trees.		
88	Redwood (<i>Sequoia sempervirens</i>)	24.5	1	4	4	3	Tree is apart of a stand of 5 trees.		
89	Redwood (<i>Sequoia sempervirens</i>)	16.7	1	4	3	2	Tree is apart of a stand of 5 trees; double top (str. defect)		
90	Redwood (<i>Sequoia sempervirens</i>)	15.5	1	4	4	3			
91	Japanese Maple (<i>Acer palmatum</i>)	11.5	3	4	4	3	Buried root crown.		
92	Japanese Maple (<i>Acer palmatum</i>)	21.0	4	4	4	3	Buried root crown.		
93	CA Fan Palm (<i>Washingtonia filifera</i>)	25.5	1	2	3	2	Exfoliating bark		
94	CA Fan Palm (<i>Washingtonia filifera</i>)	27.5	1	2	2	1	Cavity in base; exfoliating bark.		
95	Canary Island Palm (<i>Phoenix carariensis</i>)	29.5	1	4	4	3			
96	CA Fan Palm (<i>Washingtonia filifera</i>)	32.7	1	3	4	3			
97	CA Fan Palm (<i>Washingtonia filifera</i>)	20.0	1	4	4	3			
98	CA Fan Palm (<i>Washingtonia filifera</i>)	27.5	1	4	3	3			
99	CA Fan Palm (<i>Washingtonia filifera</i>)	23.3	1	4	3	3			
100	Canary Island Palm (<i>Phoenix carariensis</i>)	32.5	1	4	3	3			
101	Canary Island Palm (<i>Phoenix carariensis</i>)	40.0	1	4	4	3			
102	CA Fan Palm (<i>Washingtonia filifera</i>)	23.5	1	3	3	3	Suppressed.		
103	Canary Island Palm (<i>Phoenix carariensis</i>)	40.0	1	4	4	3			
104	Canary Island Palm (<i>Phoenix carariensis</i>)	33.0	1	4	4	3			
105	Canary Island Palm (<i>Phoenix carariensis</i>)	33.5	1	4	3	3			
106	Canary Island Palm (<i>Phoenix carariensis</i>)	37.0	1	4	4	3	Diameter measured @ 3.5' above grade.		
107	Canary Island Palm (<i>Phoenix carariensis</i>)	31.0	1	4	4	3			
108	CA Fan Palm (<i>Washingtonia filifera</i>)	27.5	1	2	2	1			
109	Canary Island Palm (<i>Phoenix carariensis</i>)	25.0	1	4	4	3	Vine surround base; rat ladder		
110	Southern Magnolia (<i>M. grandiflora</i>)	16.5	1	4	4	3			
111	Canary Island Palm (<i>Phoenix carariensis</i>)	21.0	1	4	4	3	Caliper @ one foot above grade.		
112	Coast live oak (<i>Quercus agrifolia</i>)	26.3	1	4	4	3	No SOD.		

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TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
113	Hawthorn (<i>Crataegus</i> spp.)	7.3	1	4	4	3	Decay column in trunk, but good health & stable.		
114	Cherry (<i>Prunus</i> spp.)	6.5	1	4	3	1	Special tree; grafted tree vulnerable to vehicles; 22.0" caliper.		
115	Deodar cedar (<i>Cedrus deodara</i>)	6.8	1	3	2	1	Heavy lean.		
116	Coast live oak (<i>Quercus agrifolia</i>)	9.5	1	4	4	3	Buried root crown; no SOD.		
117	Coast live oak (<i>Quercus agrifolia</i>)	9.3	1	4	4	3	No SOD.		
118	Coast live oak (<i>Quercus agrifolia</i>)	18.1	1	4	4	3	No SOD.		
119	Purple plum (<i>Prunus cerasifera</i>)	11.7	3	4	4	3			
120	Purple plum (<i>Prunus cerasifera</i>)	9.4	3	4	4	3			
121	Coast live oak (<i>Quercus agrifolia</i>)	9.7	1	4	4	3	No SOD.		
122	Coast live oak (<i>Quercus agrifolia</i>)	11.5	1	4	3	3	No SOD.		
123	Coast live oak (<i>Quercus agrifolia</i>)	20.1	1	3	3	3	No SOD.		
124	Coast live oak (<i>Quercus agrifolia</i>)	9.9	2	4	4	3	No SOD.		
125	Coast live oak (<i>Quercus agrifolia</i>)	6.1	2	3	3	2	Suppressed.		
126	Coast live oak (<i>Quercus agrifolia</i>)	35.8	2	2	2	1	Sign. Decay; previous failures; truncated; previously #15.		
127	Black oak (<i>Quercus kelloggii</i>)	17.7	1	2.5	2.5	2	Prev.#14; cavity in base; dieback in canopy.		
128	Coast live oak (<i>Quercus agrifolia</i>)	36.2	2	3	2	1	Prev.#4; decay in scf.branch attach; canopy stressed.		
129	Coast live oak (<i>Quercus agrifolia</i>)	8.6	1	4	4	3	Previously #7.		
130	Coast live oak (<i>Quercus agrifolia</i>)	51.2	3	4	3	3	No SOD; previously #3.		
131	Blue gum (<i>Eucalyptus globulus</i>)	58.1	1	4	3	4	Historic tree; large deadwood over high use areas.		
132	Coast live oak (<i>Quercus agrifolia</i>)	26.5	2	4	3	3	No SOD; decay in scaffold limb.		
133	Coast live oak (<i>Quercus agrifolia</i>)	27.1	1	2	2	1	Hypoxylon, deadwood; deadwood rotter in scf.limb. Hazard.		
134	Black oak (<i>Quercus kelloggii</i>)	37.1	2	4	2	3	Deadwood + widowmaker; prev. #8; has cabling system		
135	CA Buckeye (<i>Aesculus californica</i>)	13.9	2	4	3	3	Included bark.		
136	Valley oak (<i>Quercus lobata</i>)	17.0	1	4	3	3	Previously #10.		
137	Coast live oak (<i>Quercus agrifolia</i>)	23.1	1	4	4	3	Previously #11.		
138	Coast live oak (<i>Quercus agrifolia</i>)	38.8	1	3	2	1	Prev. #12; ivy; decay in common attach of scaffold limb.		
139	Black oak (<i>Quercus kelloggii</i>)	13.5	1	4	4	3	Previously #13.		
140	Valley oak (<i>Quercus lobata</i>)	9.3	1	4	3	3	Heavy bow toward building.		
141	Japanese Maple (<i>Acer palmatum</i>)	7.4	2	4	4	3			
142	Japanese Maple (<i>Acer palmatum</i>)	11.6	3	4	4	3			
143	Fringe Tree (<i>Chionanthus virginicus</i>)	9.0	1	4	3	3	In parking island.		

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TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
144	Fringe Tree (<i>Chionanthus virginicus</i>)	9.8	1	4	3	3	In parking island.		
145	Pineapple Guava (<i>Feijoa sellowiana</i>)	8.3	1	4	2	1	Behind sitting area; procumbent form.		
146	Deodar cedar (<i>Cedrus deodara</i>)	37.6	1	4	4	3	Planting island tree.		
147	Privet (<i>Ligustrum lucidum</i>)	26.7	5	4	3	3	Multi-stemmed.		
148	Canyon live oak (<i>Q. chrysolepis</i>)	13.6	1	4	4	3			
149	Deodar cedar (<i>Cedrus deodara</i>)	22.3	1	4	4	3			
150	Modesto Ash (<i>Fraxinus velutina</i>)	6.5	1	3	3	2			
151	Modesto Ash (<i>Fraxinus velutina</i>)	7.6	1	3	3	2	Dieback in canopy.		
152	Modesto Ash (<i>Fraxinus velutina</i>)	7.7	1	2	3	2	Dieback in canopy.		
153	Modesto Ash (<i>Fraxinus velutina</i>)	8.5	1	2	3	2	Dieback in canopy.		
154	Modesto Ash (<i>Fraxinus velutina</i>)	8.0	1	2	3	2	Dieback in canopy.		
155	Modesto Ash (<i>Fraxinus velutina</i>)	7.1	1	2	2	2	Dieback in canopy.		
156	Modesto Ash (<i>Fraxinus velutina</i>)	6.8	1	2	2	2	Dieback in canopy.		
157	Modesto Ash (<i>Fraxinus velutina</i>)	7.5	1	2	2	2	Dieback in canopy.		
158	Modesto Ash (<i>Fraxinus velutina</i>)	7.0	1	2	2	2	Dieback in canopy.		
159	Modesto Ash (<i>Fraxinus velutina</i>)	6.5	1	2	2	2	Dieback in canopy.		
160	Modesto Ash (<i>Fraxinus velutina</i>)	7.0	1	2	2	2	Dieback in canopy.		
161	Modesto Ash (<i>Fraxinus velutina</i>)	11.2	2	1	2	2			
162	Modesto Ash (<i>Fraxinus velutina</i>)	7.2	1	4	4	3			
163	Modesto Ash (<i>Fraxinus velutina</i>)	6.3	1	4	4	3			
164	Modesto Ash (<i>Fraxinus velutina</i>)	7.0	1	3	3	2	Dieback in canopy.		
165	Modesto Ash (<i>Fraxinus velutina</i>)	9.1	1	4	3	2			
166	Modesto Ash (<i>Fraxinus velutina</i>)	12.7	1	3	3	2	Girdle roots.		
167	Black Locust (<i>Robinia pseudacacia</i>)	9.3	1	4	4	3			
168	Black Locust (<i>Robinia pseudacacia</i>)	7.5	1	2	2	1	Hazard; surface rooting.		
169	Black Locust (<i>Robinia pseudacacia</i>)	6.4	1	3	3	2	Cavity in stem; surface rooting.		
170	Black Locust (<i>Robinia pseudacacia</i>)	9.0	1	4	4	2	Surface rooting.		
171	Black Locust (<i>Robinia pseudacacia</i>)	9.5	1	4	4	2	Cavity in trunk; surface rooting.		
172	Black Locust (<i>Robinia pseudacacia</i>)	6.7	1	2	2	1	Cavity in trunk; surface rooting.		
173	Canary Island Pine (<i>P. canariensis</i>)	17.1	1	4	4	3			
174	Redwood (<i>Sequoia sempervirens</i>)	9.4	1	4	4	3			
175	Redwood (<i>Sequoia sempervirens</i>)	15.5	1	4	4	3			
176	Modesto Ash (<i>Fraxinus velutina</i>)	6.2	1	2	2	1	Parking lot island tree.		
177	Modesto Ash (<i>Fraxinus velutina</i>)	6.0	1	3	2	1	Parking lot island tree; girdle roots.		
178	Modesto Ash (<i>Fraxinus velutina</i>)	6.7	1	2	2	1	Parking lot island tree.		

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TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
179	Modesto Ash (<i>Fraxinus velutina</i>)	6.7	1	2	2	1	Parking lot island tree.		
180	Modesto Ash (<i>Fraxinus velutina</i>)	8.4	1	3	2	1	Parking lot island tree; girdle roots; surface rooter.		
181	Modesto Ash (<i>Fraxinus velutina</i>)	6.4	1	2	2	1	Parking lot island tree; girdle roots.		
182	Modesto Ash (<i>Fraxinus velutina</i>)	9.4	1	2	2	1	Parking lot island tree.		
183	Modesto Ash (<i>Fraxinus velutina</i>)	6.5	1	2	2	1	Parking lot island tree.		
184	Modesto Ash (<i>Fraxinus velutina</i>)	6.0	1	2	2	1	Parking lot island tree.		
185	Modesto Ash (<i>Fraxinus velutina</i>)	6.8	1	2	2	1	Parking lot island tree.		
186	Coast live oak (<i>Quercus agrifolia</i>)	7.3	1	4	4	3	No SOD.	182, 183	10.0 feet from road curb & 2.4 feet to parking lot curb.
187	Acacia decurrens	11.0	1	4	4	3	Leans toward parking lot.	184, 185	11.3 feet from road retaining wall & 1.3 feet from parking lot curb.
188	Acacia decurrens	7.5	1	4	1	1	Main leader recently removed.	186, 187	8.3 feet from road retaining wall; 5.5 feet from parking lot curb.
189	Acacia decurrens	36.9	5	4	2	2	Multi-stemmed @ common attachment.	188, 189	14.4 feet to road retaining wall; 2.0 feet to parking lot curb.
190	Coast live oak (<i>Quercus agrifolia</i>)	9.0	1	3	3	3	No SOD.	190, 191	5.7 feet to face of v-ditch; 9.7 feet to retaining wall.
190A	Coast live oak (<i>Quercus agrifolia</i>)	3.8, 4.3, 4.2 @ 2' a.g.	3	2	1	1		192, 193	5.7 feet to face of v-ditch; 14.6 feet to road curb face.
191	Coast live oak (<i>Quercus agrifolia</i>)	8.0	1	2	3	2		194, 195	5.3 feet to building corner; 21.0 feet to parking lot curb.
192	Modesto Ash (<i>Fraxinus velutina</i>)	6.0	1	2	2	1	Parking lot island tree.		
193	Modesto Ash (<i>Fraxinus velutina</i>)	7.5	1	2	2	1	Parking lot island tree.		
194	Coast live oak (<i>Quercus agrifolia</i>)	8.2	1	3	3	1	Parking lot island tree; surface roots.		
195	Coast live oak (<i>Quercus agrifolia</i>)	8.3	1	2	2	1	Parking lot island tree; surface roots.		
196	Coast live oak (<i>Quercus agrifolia</i>)	6.3	1	2	3	1			
197	Melaleuca spp.	15.2	1	2	3	1	4.0" stem is dead.		
198	Melaleuca spp.	22.5	2	3	3	2			
199	Coast live oak (<i>Quercus agrifolia</i>)	10.4	1	4	4	3	No SOD.		
200	Coast live oak (<i>Quercus agrifolia</i>)	26.0	1	4	4	3	No SOD.		
201	Coast live oak (<i>Quercus agrifolia</i>)	27.0	1	2	2	1	Cavity in trunk; SOD symptomatic; hazard; SOD sym. toyon)	224, 225	1.0 feet from stair; 7.0 feet from parking lot sidewalk curb (close to sitting area).
202	Coast live oak (<i>Quercus agrifolia</i>)	6.0	1	3	3	3		220, 221	3.8 feet from stair.
203	Hinoki cypress (<i>Chamaecyparis obtusa</i>)	11.3	2	4	4	3		222, 223	9.1 feet from stair; 13.5 feet to curb adjacent to sitting area.
204	Coast live oak (<i>Quercus agrifolia</i>)	16.4	2	4	4	3		226, 227	7.2 feet to curb adjacent to sitting area.
205	Valley oak (<i>Quercus lobata</i>)	20.6	1	3	3	3		218, 219	4.4 feet from stair below T-206; 2.6 feet to stair closest to subject tree.

TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
206	Western red cedar (<i>Thuja plicata</i>)	6.4	1	3	3	1		216, 217	3.8 feet to up slope curb; 4.0 feet to rock retaining wall.
207	Coast live oak (<i>Quercus agrifolia</i>)	19.0	1	3	3	3		228, 229	1.4 feet & 3.7 feet parking lot infrastructure (island tree)
208	Cherry (<i>Prunus</i> spp.)	9.3	1	2	2	1		212, 213	4.2 feet to road curb.
209	European white birch (<i>Betula pendula</i>)	6.8	1	3	3	2		210, 211	3.5 feet from down slope retaining wall.
210	Coast live oak (<i>Quercus agrifolia</i>)	6.4	1	4	3	2	Suppressed.	202, 203	5.0 feet to up slope parking lot curb.
210A	Coast live oak (<i>Quercus agrifolia</i>)	5.3	1	3	2	2		204, 205	8.5 feet down slope of wood retaining wall; 10.3 feet to parking lot curb.
210B	Coast live oak (<i>Quercus agrifolia</i>)	6.4	1	3	3	3		206, 207	5.5 feet from down slope wood retaining wall; 13.5 feet from up slope parking lot curb.
210C	Coast live oak (<i>Quercus agrifolia</i>)	7.4	1	3	3	3		208, 209	5.1 feet from parking lot curb; 10.3 feet to retaining wall.
211	Australian tea (<i>Leptospermum laevigatum</i>)	17.3	4	3	3	1			
212	Coast live oak (<i>Quercus agrifolia</i>)	6.2	1	4	3	2		200, 201	3.7 feet to down slope wood retaining wall.
213	Coast live oak (<i>Quercus agrifolia</i>)	8.4	1	2	3	2		196, 197	4.4 feet to retaining wall; 10.3 feet to parking lot curb.
213A	Coast live oak (<i>Quercus agrifolia</i>)	8.6	2	2	3	2	2 stems: 4.1" & 4.5" DBH	198, 199	3.2 feet to parking lot curb; 8.4 feet to concrete stair.
214	Coast live oak (<i>Quercus agrifolia</i>)	13.0	1	4	4	3		203, 231	3.6 feet from parking lot curb; 5.9 feet to red parking lot curb; 6.6 feet to storm drain lid.
215	Apple (<i>Malus</i> spp.)	10.4	2	4	4	3		261	16.8' east of sidewalk; 15.5' west of T-216; 6.6' to curb.
216	Deodar cedar (<i>Cedrus deodara</i>)	12.5	1	4	4	3		260	47' west of T-341; 8.6' to curb face; 5.2' to sidewalk.
217	Willow (c.f. <i>Salix babylonica</i>)	33.2	3	2	2	1		262	6.8' to west of sidewalk; 10.5' to east sidewalk.
218	Acacia decurrens	25.7	6	4	2	1	Clump of stems.	237	2' from v-ditch; 4.3' from retaining wall.
219	Acacia decurrens	18.6	5	4	2	1	Clump of stems.	236	2.1' from v-ditch; 4.4' from retaining wall.
220	Acacia decurrens	6.2	3	4	2	1			3' north of T-219; 2.1' from v-ditch; 4.4' from retaining wall.
221	Acacia decurrens	11.8	1	4	2	1	Leans towards walk & road; over path.	235	3.1' from face of retaining wall; 25.9' S from light.
222	Acacia decurrens	10.3	1	3	2	1	Deadwood; widowmaker present in tree. (April 2012 - Above are dead & stripped).		
223	Acacia decurrens	9.8	4	2	2	1	Clump of stems; reproduction. (April 2012 - Above are dead & stripped).		
224	Acacia decurrens	20.0	5	2	2	1	Clump of stems; reproduction.		

TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
225	Coast live oak (<i>Quercus agrifolia</i>)	30.2	2	4	3	2	Acute angle crotch w/long embedded bark. No SOD.		
226	Coast live oak (<i>Quercus agrifolia</i>)	9	1	4	4	3	No SOD.	238	5.5' below deck; 26' slope distance above retaining wall.
227	Coast live oak (<i>Quercus agrifolia</i>)	9	1	4	4	3	No SOD.	239	10' northwest of T-226.
228	Coast live oak (<i>Quercus agrifolia</i>)	10.2	1	4	4	3	No SOD.	244	12.5' W of T-257; 8' north of NW deck corner.
229	Coast live oak (<i>Quercus agrifolia</i>)	8.2	1	2	2	1	Significant bark exfoliation; carpenter worm infestation.	240, 242	15.1' below deck; 14.8' north of T-227.
230	Coast live oak (<i>Quercus agrifolia</i>)	6	1	3	3	2	Root system may be impacted.	243	18.8' N of NW corner of deck; 10.1' north of T-228.
231	Coast live oak (<i>Quercus agrifolia</i>)	7.1	1	3	4	2	No SOD; wound on lower trunk.	242	11' north of T-229; 26.8' above retaining wall.
232	Coast live oak (<i>Quercus agrifolia</i>)	9.4	1	2	2	1	Hazard; approximately 2' from V-ditch.	234	4' to face of retaining wall; 6.3' N of light.
233	Black oak (<i>Quercus kelloggii</i>)	13.6	1	4	3	3	No SOD.	257	32.5' above retaining wall; 19.8' below T-253.
234	Coast live oak (<i>Quercus agrifolia</i>)	10	1	4	4	3	No SOD.	258	8.2' NNE of T-233; 39.2' above (east) of retaining wall.
235	Coast live oak (<i>Quercus agrifolia</i>)	8.5	1	4	4	3	Slight lean.	232	16.6' to face of retaining wall; 34' from NE corner of drainbox.
236	Coast live oak (<i>Quercus agrifolia</i>)	10	1	4	4	3	Diameter taken @ 4' above grade due to lower branching.	365	15.9 feet from northwest corner of drain box.
237	Monterey pine (<i>Pinus radiata</i>)	16.4	1	3	3	2	WPGR.	364	32.9 feet to roadway curb; 27.9 feet from existing driveway curb.
238	Monterey pine (<i>Pinus radiata</i>)	17.3	1	2	2	1	Decline; dieback & browning foliage; RTB.	363	6.4 feet from southeast driveway edge; 19.2 feet to northwest corner of drainbox.
239	Monterey pine (<i>Pinus radiata</i>)	22.8	1	4	4	4	Probably will not be affected by construction.	362	20 feet from existing curb edge; 45 feet from northwest corner of drain box.
240	Monterey pine (<i>Pinus radiata</i>)	16.5	1	2	3	1	Western pine gall rust (<i>Periderm harknessii</i>) infection. Note: The tree overtops oak reproduction.	361	14.1 feet from road way curb face; 59.1 feet from northwest corner of drain box.
241	Coast live oak (<i>Quercus agrifolia</i>)	15.7	1	2	1	1	Severe decay; tree is decline.		
242	Valley oak (<i>Quercus lobata</i>)	25.9	1	3	1	1	Severe lean to southeast & crowding T-243.		
243	Valley oak (<i>Quercus lobata</i>)	17.7	1	2	1	1	Crowded by T-242; tree targets road.		
244	Coast live oak (<i>Quercus agrifolia</i>)	13.0	1	3	3	3	Buried root crown. (Please clear it.)		
245	CA Bay Laurel (<i>Umbellularia californica</i>)	22.8	3	3	2	1	Crowding valley oak (T-246).		
246	Valley oak (<i>Quercus lobata</i>)	17.6	1	3	3	3	Leans towards building.		
247	Black oak (<i>Quercus kelloggii</i>)	38.0	1	1	1	1	25 feet of northwest corner of E. building; decayed dead stump; brush cracks. This tree is a hazard.	253, 254	30.6' north of NE corner of building.
248	Coast live oak (<i>Quercus agrifolia</i>)	19.9	2	2	1	1	Severe decay column; scaffold limb over shed. This tree is a hazard.	255	13' from north side of building; 11.5' NE of T-249.

HEALTH STRUCTURAL CONDITION = 1 DEAD, 2 POOR, 3 FAIR, 4 GOOD, 5 EXCELLENT
 SUITABILITY FOR PRESERVATION: 1=POOR, 2 FAIR, 3=GOOD

INSPECTED BY: UFA, Inc.

TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
249	Coast live oak (<i>Quercus agrifolia</i>)	14.3	2	3	3	3	Between east building & shed. Crack and staining on northwest base.	256	6.4' from north side of building.
250	Coast live oak (<i>Quercus agrifolia</i>)	11.9	2	3	3	3	Wood rail and fill up slope.	252	6.7' SE of T-251; 14.3' NW of shed corner.
251	Coast live oak (<i>Quercus agrifolia</i>)	12.5	1	3	3	3	25 feet west of northwest corner of shed.	251	22' directly below T-247.
252	Coast live oak (<i>Quercus agrifolia</i>)	6.3	1	2	2	2	Overtopped by T-251; tree is crowded.	250	4.6' below T-251; 31.5' above v-ditch.
253	Coast live oak (<i>Quercus agrifolia</i>)	6.5	1	2	2	2	Crowded by T-252 (down slope).	249	1.6' down slope of T-252.
254	Coast live oak (<i>Quercus agrifolia</i>)	14.3	2	3	3	3	Co-dominant stems with an acute angle crotch (defect to monitor).	248	6.6' north of T-255; 4.3' south of T-253.
255	Black oak (<i>Quercus kelloggii</i>)	8.8	1	1	1	1	Canker and decay.	247	13.5' below T-256; 16.8' below shed NW corner.
256	Coast live oak (<i>Quercus agrifolia</i>)	12.8	1	2	1	1	Severe lean down slope; small canopy.	246	3' from NW shed corner; 22' north of T-251.
257	Coast live oak (<i>Quercus agrifolia</i>)	26.3	2	3	2	3	Acute angle crotch by east building ramp.	245	By ramp base; 5' from north side of building; 1' to deck ramp.
258	Coast live oak (<i>Quercus agrifolia</i>)	11.4	2	2	2	2	Sunscald		
259	Coast live oak (<i>Quercus agrifolia</i>)	7.0	1	3	3	3	Located 4 feet from retaining wall.		
260	Toyon (<i>Arbutus heteromeles</i>)	8.7	4	3	3	3	Located 8 feet from retaining wall; crossing branch; asymmetric toward new building.		
261	Coast live oak (<i>Quercus agrifolia</i>)	7.6	1	4	4	3	Asymmetric and lean toward new structure; Located 8 feet from retaining wall.		
262	Coast live oak (<i>Quercus agrifolia</i>)	6.4	1	3	3	3		295, 297	35.5' from north side of Co. building; 17.3' from T-263.
263	Coast live oak (<i>Quercus agrifolia</i>)	15.8	2	3	3	3	On building pad; near southeast corner	298	45' NE of SE corner; 20.1' NW of T-266.
264	Coast live oak (<i>Quercus agrifolia</i>)	18.5	2	4	4	4	At top of clinic cut bank; above T-263.		
265	Coast live oak (<i>Quercus agrifolia</i>)	10.0	1	4	4	4	Located 15' east of T-264.		
266	Black oak (<i>Quercus kelloggii</i>)	6.0	2	2	2	2	Located above the northeast corner of clinic.	299	29' SE corner of co. building; ENE 22.6' due south of T-266; 29.5' SE of building corner.
267	Coast live oak (<i>Quercus agrifolia</i>)	23.0	2	3	3	3	Located 30' southeast of T-266.	300	17' NE of T-267; 36' from SE corner of con. Building.
268	Coast live oak (<i>Quercus agrifolia</i>)	17.0	1	3	2	2	Located east & up slope of T-266.	301	16' SE of T-268; 42' from SE corner of con. Building.
269	Pacific madrone (<i>Arbutus menziesii</i>)	20.0	2	3	3	3	Poison oak in tree; other madrones are declining/dying.	302	10.5' NE of T-271; 56' from SE corner of co. building.
270	Black oak (<i>Quercus kelloggii</i>)	7.0	1	1	3	1	Canopy is dying back. Located southeast of T-267.	305	
271	Black oak (<i>Quercus kelloggii</i>)	10.0	1	2	2	2	V-crotch (acute angle crotch); poison oak in tree.	306	
272	Black oak (<i>Quercus kelloggii</i>)	7.5	1	3	3	3	Leans down slope.		8' north of 274
273	Pacific madrone (<i>Arbutus menziesii</i>)	9.0	1	4	3	3	Very healthy for this species.	307	70' from building; 19.9' below T-274.
274	Coast live oak (<i>Quercus agrifolia</i>)	17.0	1	4	3	3	Very full canopy.		
275	Valley oak (<i>Quercus lobata</i>)	24.5	1	4	3	3	One cavity near crotch.		
276	Pacific madrone (<i>Arbutus menziesii</i>)	16.0	2	3	3	3	Remove poison oak.		

HEALTH STRUCTURAL CONDITION = 1 DEAD, 2 POOR, 3 FAIR, 4 GOOD, 5 EXCELLENT
 SUITABILITY FOR PRESERVATION: 1=POOR, 2 FAIR, 3=GOOD

INSPECTED BY: UFA, Inc.

TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
277	Pacific madrone (<i>Arbutus menziesii</i>)	7.7	1	4	3	3	Protect.		
278	CA Bay Laurel (<i>Umbellularia californica</i>)	8.8	1	4	4	4	Very good health and vigor.		
279	Black oak (<i>Quercus kelloggii</i>)	6.8	1	3	3	3	Located 5' east of T-270.	303	6' south of T-269; 60.5' from SE corner of con. Building.
280	Black oak (<i>Quercus kelloggii</i>)	9.0	1	3	3	3	Healthy, but has a lean; Located 12 feet east of T-279.	304	8' east of T-269; 90 degrees from T-269 & building corner.
281	Coast live oak (<i>Quercus agrifolia</i>)	32.5	2	3	1	2	Procumbent; trunk crack.		
282	Coast live oak (<i>Quercus agrifolia</i>)	7.8	1	2	1	1	Leans to southwest.		
283	Black oak (<i>Quercus kelloggii</i>)	7.4	3	1	1	1	Sudden Oak Death (SOD, <i>Phytophthora ramorum</i>); adjacent to T-284.		
284	Coast live oak (<i>Quercus agrifolia</i>)	20.1	2	3	2	2	Adjacent / against T-283 (SOD).		
285	Valley oak (<i>Quercus lobata</i>)	18.7	1	3	2	2	Embedded dead false leader.	321	10.5' NE of T-285; 67' from building siding.
286	Black oak (<i>Quercus kelloggii</i>)	15.4	2	2	3	2	Moving back east across lower slope.	311	14.5' directly up slope; 43' from building siding.
287	Black oak (<i>Quercus kelloggii</i>)	6.9	1	2	3	2	Crowded by three other trees.	308	30.5' from building siding.
288	Black oak (<i>Quercus kelloggii</i>)	7.7	1	2	2	2	Located just above cut bank & 2 feet from T-287.	309	28.5' from building siding.
289	Black oak (<i>Quercus kelloggii</i>)	12.4	2	2	2	2	This is the southwest most tree on cut bank edge; above disabled entrance.	318	17.0' NE of T-297; 34.0' from building siding.
290	Black oak (<i>Quercus kelloggii</i>)	9.8	1	1	3	1	SW most tree on slope; Sudden Oak Death (SOD, <i>Phytophthora ramorum</i>).	322	27.8' SW of T-292; 61' from building siding.
291	Coast live oak (<i>Quercus agrifolia</i>)	15.5	1	3	2	2	Healthy; Located 30 feet east of T-290.	320	17' directly up slope of T-292; 74' from building siding.
292	Coast live oak (<i>Quercus agrifolia</i>)	27.8	4	3	3	3	Low multi-stemmed; located adjacent to dead oak down slope from T-291.	319	30' up slope of T-299; 56' from building siding.
293	Black oak (<i>Quercus kelloggii</i>)	13.1	2	1	1	1	Sudden Oak Death (SOD, <i>Phytophthora ramorum</i>); Located on cut bank & southwest of T-288.	310	7' SW of T-288; 28' from siding.
294	Black oak (<i>Quercus kelloggii</i>)	6.1	1	2	3	2	No evidence of Sudden Oak Death (SOD, <i>Phytophthora ramorum</i>)	312	11.8' SW of T-286; 43' from building siding.
295	Black oak (<i>Quercus kelloggii</i>)	9.8	1	3	4	3	Carpenter worm infestation.	313	7.2' SW of T-294; 43' from building siding.
296	Black oak (<i>Quercus kelloggii</i>)	11.3	1	1	1	1	Sudden Oak Death (SOD, <i>Phytophthora ramorum</i>); located 2nd tree up from bank above T-297.	314	26.3' SW of T-293; 33.5' from building siding.
297	Black oak (<i>Quercus kelloggii</i>)	7.0	1	4	2	2	Located at top of cut bank; leans down slope.	315	4.3' below T-296; 27.5 from building siding.
298	Black oak (<i>Quercus kelloggii</i>)	13.5	2	2	1	1	Located on cut bank; poor lean.	316	3.5' NE of T-297; 27.0' from building siding.
299	Black oak (<i>Quercus kelloggii</i>)	8.2	1	3	2	2	Located right on cut bank edge.	317	11.7' SW of T-297; 26.0' from building siding.
311	Monterey pine (<i>Pinus radiata</i>)	20	1	3	1	1	Previously topped @ 6 feet above grade & has three false leaders.	76, 77	0.0 feet along transect.
312	Monterey pine (<i>Pinus radiata</i>)	20.6	1	2	2	1	WPGR infection	78, 79	19.4 feet along transect.
313	Monterey pine (<i>Pinus radiata</i>)	17.8	1	1	1	1	WPGR stem canker embedded in trunk.	80, 81	33.4 feet along transect.

HEALTH STRUCTURAL CONDITION = 1 DEAD, 2 POOR, 3 FAIR, 4 GOOD, 5 EXCELLENT
 SUITABILITY FOR PRESERVATION: 1=POOR, 2 FAIR, 3=GOOD

INSPECTED BY: UFA, Inc.

TREE SURVEY

TREE	NAME	TOTAL DBH	# OF STEMS	HEALTH	STR. COND.	SUIT.	CONCLUSIONS / COMMENTS	Waypoint(s)	Distance to Infrastructure
314	Monterey pine (Pinus radiata)	7.5	1	1	1	1	Senescent; dead branches; suppressed	82, 83	43.8 feet along transect.
315	Monterey pine (Pinus radiata)	19.1	1	3	3	2	WPGR	84, 85	55.0 feet along transect.
316	Monterey pine (Pinus radiata)	19.2	1	3	2	1	False leaders; s-curved trunk	86, 87	67.0 feet along transect.
317	Monterey pine (Pinus radiata)	16.5	1	1	1	1	Dead branches; extensive dieback	88, 89	77.6 feet along transect.
318	Monterey pine (Pinus radiata)	22.7	1	1	1	1	HAZARD TREE; WPGR canker in stem @ approx. 20 feet above grade. Targets road.	90, 91	105.5 feet along transect. 0.0 feet along transect; northmost tree.
319	Monterey pine (Pinus radiata)	12.2	1	1	1	1	Decline, deadwood	92, 93	
320	Monterey pine (Pinus radiata)	21.4	1	2	2	2	Thin canopy	94, 95	11.0 feet along transect.
321	Monterey pine (Pinus radiata)	17.6	1	2	1	1	Over-extended branches	96, 97	18.0 feet along transect.
322	Monterey pine (Pinus radiata)	13.5	1	2	2	2	Asymmetrical canopy	98, 99	45.0 feet along transect.
323	Monterey pine (Pinus radiata)	21	1	3	1	1	False leaders; thin canopy	100, 101	56.0 feet along transect.
324	Monterey pine (Pinus radiata)	17.1	1	2	2	1	Dieback & thin canopy.	102, 103	75.0 feet along transect.
325	Monterey pine (Pinus radiata)	15.7	1	2	1	1	Asymmetrical canopy (T-326 is dominant).	104, 105	96.5 feet along transect.
326	Monterey pine (Pinus radiata)	23.6	1	3	2	1	Over-extended limbs; 7 feet from T-325	106, 107	103.5 feet along transect.
327	Coast redwood (Sequoia sempervirens)	23.7	1	4	4	4	Dominant tree; northeast most tree	120, 121	0.0 feet along transect
328	Coast redwood (Sequoia sempervirens)	10.4	1	2	2	1	Dieback; extensive competition	122, 123	9.0 feet along the transect.
329	Coast redwood (Sequoia sempervirens)	9.2	1	3	4	3	Good condition, but subordinate.	124, 125	17.2 feet along the transect.
330	Coast redwood (Sequoia sempervirens)	13.5	1	2	2	1	Too much competition; subordinate	126, 127	24.8 feet along transect.
331	Coast redwood (Sequoia sempervirens)	6	1	1	2	1		128, 129	8.0 feet from west curb.
332	Coast redwood (Sequoia sempervirens)	10.8	1	2	2	1	Dieback	130, 131	75-76 feet along transect.
333	Coast redwood (Sequoia sempervirens)	15.5	1	2	2	1	Dieback & sprouts	132, 133	81.5 feet along transect.
334	Coast redwood (Sequoia sempervirens)	10	1	3	3	3	Little leaf	134, 135	97 feet along transect.
335	Coast redwood (Sequoia sempervirens)	9.5	1	1	1	1	Severe dieback	136, 137	108.5 feet along transect.
336	Coast redwood (Sequoia sempervirens)	11.6	1	1	1	1	Severe dieback	138, 139	117.3 feet along transect.
337	Coast redwood (Sequoia sempervirens)	10.7	1	2	3	2	Chlorotic; tip necrosis	140, 141	123.5 feet along transect.
338	Coast redwood (Sequoia sempervirens)	11.5	1	3	3	2	Chlorotic	142, 143	134.0 feet along transect.
339	Coast redwood (Sequoia sempervirens)	14	1	2	3	2	Chlorotic; little leaf	144, 145	144.7 feet along transect.