



SIERRA CLUB

DELTA-SIERRA GROUP
MOTHER LODE CHAPTER

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Re: PREPARATION OF ENVIRONMENTAL IMPACT REPORT, ST. JOSEPH'S MEDICAL CENTER HOSPITAL EXPANSION PROJECT

The Delta-Sierra Group has reviewed the Notice of Preparation (NOP) for the St. Joe's project and has the following comments.

Project

The NOP project description fails to adequately describe the expansion in terms of the existing facility.

Recent news accounts describe the project as "a sweeping expansion that will include a new emergency department and more than 140 additional hospital beds," including 120 acute hospital beds, 24 intensive care unit beds. Thus, the expansion would apparently equal an approximate 40% addition over the current 355 hospital beds.

In 2016, Kaiser Permanente bought a 20% stake in St. Joseph's from owner Dignity Health. Following the deal, St. Joseph's emergency department underwent an expansion from 28 to 52 beds at a cost of \$8 million.

The project appears to be the direct result of Kaiser entering into a long term financial agreement with St Joe's to provide hospitals services to Kaiser members, instead of Kaiser plans for expanding the exiting clinic on West Lane into a small hospital, as was originally planned decades ago. Is this true?

The DEIR must be much more transparent in describing the purpose of the project than the skimpy description in the NOP.

Proposed Master Development Plan

The project's proposed Master Development Plan outlines long term plans for phased expansion on- and off-site.

When will the draft Master Development Plan be released for public review?

Is it the intention of Dignity and/or the City to involved members of the community in the discussions finalizing the Master Development Plan? If not, why not?

The public review of the DEIR must be accompanied by the draft Master Development Plan.

Constrained Site and Consideration of Alternatives

The NOP notes that “The current 18.7-acre Medical Center occupies an in-fill site that is physically constrained and presents a challenge in expanding medical care to serve the growing region. Due to site constraints, the Medical Center also relies upon off-site properties to house medical support services, out-patient treatment, and parking. With the exception of unimproved properties that are identified in the Master Development Plan to be used for temporary structures or parking during construction, the off-site properties are not proposed for modification at this time...”

It appears that the St. Joe’s administration is proceeding with a huge expansion plan without examining realistic alternatives for acquiring adjacent vacant or underutilized properties and, instead, attempting to shoe-horn all portions of the near-term expansion on the existing hospital site. The DEIR must consider in detail alternatives to the project that rely more on use of hospital-owned off-site properties and/or involve acquisition of adjacent vacant or underutilized properties.

The Sierra Club will be looking very closely at the alternatives analysis included in the DEIR. The California Environmental Quality Act has very strict and specific requirements for studying a range of feasible alternatives in an EIR. Please do not disappoint us.

A 12-story parking structure?

Perhaps the most disturbing part of this proposed expansion is the proposal to construct a massive new parking garage that would be out of scale with the existing neighborhood.

While the project’s new Acute Care Hospital Tower of 281,000 SF – 331,000 SF would be five stories in height, the NOP project description includes a new multi-story parking structure that would be 8 to 12 stories with 1,600 to 1,700 spaces.

The City has no existing parking garage that comes close to 12 stories in height, in downtown or elsewhere.

Again, the hospital administration appears to be trying to cram too of the project in a small campus site.

Transportation, Transit, and Greenhouse Emissions

The proposed Master Development Plan must develop reasonable alternatives to constructing such a huge parking garage. The Master Development Plan must take into account the massive transportation, air quality, noise and other direct impacts to nearby residents (as well as patients and nearby medical workers) caused by a significant increase in single occupant vehicles attracted by a 1,600 to 1,700 space garage.

The proposed Master Development Plan and the DEIR must include very specific mitigation plans to reduce auto trips and control greenhouse emissions due to the 40% increase in hospital beds. The mitigation could, for example, involve a direct annual subsidy by the hospital of added transit service that could be used by workers and visitors.

Biological Resources

The NOP states that “This section may be fully addressed in the IS. If it is determined biological resources should be addressed in the EIR...”

The proposed project is immediately adjacent to two large cemeteries which provide open space and habitat to a wide range of species, some of which are deemed “sensitive” or even legally listed as threatened, e.g., hawks. The existing biological resources of these two major open space areas must be described and the potential impacts of the proposed hospital expansion examined.

Please add me and the Delta-Sierra Group to your CEQA notification list. You may contact me by email at parfrey@sbcglobal.net, or by phone at 209-641-3380.

If there will be opportunities to review the draft Master Development Plan through a community process, please include us in the notification.

Sincerely,

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