

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning &amp; Research



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**SEP 13 2019****STATE CLEARINGHOUSE**

September 13, 2019

Ms. Rachel Kwok, Environmental Planner  
City of Santa Monica  
City Planning Division  
1685 Main Street, Room 212  
Santa Monica, CA 90401

RE: Providence Saint John's Health Center  
Phase II Project – Draft Environmental  
Impact Report (DEIR)  
SCH # 2017041030  
GTS # 07-LA-2017-02730  
Vic. LA-10/PM: 2.97

Dear Ms. Rachel Kwok:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced Draft Environmental Impact Report (DEIR). The proposed Phase II Master Plan is a comprehensive plan that will guide the implementation of Phase II improvements on the North and South Campuses of Providence Saint John's Health Center (PSJHC). The plan will also improve infrastructure and circulation in and around the PSJHC Campuses, create a new network of open space areas and enhancements to the pedestrian realm, and provide a comprehensive parking plan to meet PSJHC peak parking demand. The Phase II Master Plan establishes the basic parameters and vested rights guiding development of the Phase II Project including, without limitation: (a) building placement, (b) vested heights, vested uses, and vested floor areas for all buildings, (c) minimum setbacks for all buildings, (d) minimum stepbacks for all buildings, (e) subterranean parking, (f) location of uses, (g) vehicular and pedestrian circulation, (h) open space and (i) a Phase II Phasing Plan that includes phasing and timing for filing development review permit applications, obtaining building permits, and constructing Phase II buildings, as well as implementing improvements such as public open space, infrastructure improvements, and community and Project benefits. The City of Santa Monica is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are SR-2, I-10, and I-405. After reviewing the DEIR, Caltrans has the following comments:

- We recommend implementing Alternative 5 (Partial Master Plan). This alternative would have the least potential to increase traffic conflicts along the State facilities near the project.
- In addition to implementing Alternative 5, we also support implementing the following project design features and mitigation measures:
  - **PDF-TR-2 (TDM):** The Applicant shall implement TDM measures so as to not exceed

the trip generation estimates calculated for the Future Years (2031 and 2042) in Tables 4.17-11 and 4.7-12 of the EIR.

- **MM-TR-1: Intersection 70:** The Project Applicant shall reconfigure the existing northbound and southbound approaches of Intersection 70 (Centinela Avenue & Santa Monica Boulevard) to provide one left-turn lane and one shared through/right-turn lane at each approach. The Project Applicant shall seek approval from the City of Los Angeles to implement this improvement.
- If Alternative 5 as well as the above project design features and mitigation measures are not implemented, an analysis of the I-405 needs to be included in the Transportation Impact Analysis (TIA). Specifically, the I-405 and SR-2 interchange may need to be included in the TIA. This is because if the proposed project is implemented, traffic from the project will likely increase Vehicle Miles Traveled (VMT) and thus the potential for traffic conflicts on the I-405. This concern is particularly strong for the I-405 and SR-2 interchange.
- The following proposed mitigation measures appear to already have been implemented, based on imagery from Google Maps. If not, please provide more information, such as detailed exhibits, showing that these mitigation measures have not already been implemented:
  - **MM-TR-2: Intersection 77:** If agreed to by the Big Blue Bus and Metro, the eastbound Big Blue Bus bus stop from the near side of the intersection shall be consolidated with the existing Metro bus stop on the far side of the intersection. The Project Applicant shall reconfigure the eastbound approach of Intersection 77 (Bundy Drive & Santa Monica Boulevard) to provide one through lane and one right-turn lane. The Project Applicant shall seek approval from the City of Los Angeles to implement this improvement.
  - **MM-TR-4: Intersection 81:** The Project Applicant shall restripe the southbound approach at Intersection 81 (Bundy Drive & I-10 Eastbound On-Ramp) to add a second left-turn lane. This would entail converting the HOV lane on that ramp to a mixed-flow lane. The Project Applicant shall seek approval from Caltrans and the City of Los Angeles to implement this improvement.
- Please confirm whether cumulative projects were accounted for in the transportation impact analysis of the Future Year (2042) scenario, similar to how cumulative projects were accounted for in the transportation impact analyses of the Approval Year (2019) and Interim Year (2031) scenarios.
- Please provide queuing and storage capacity analyses for all impacted off-ramps.
- Please provide the Construction Traffic Management Plan for Caltrans review and approval.

The following information is included for your consideration.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Also, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that the project needs to be designed to discharge clean run-off water.

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If you have any questions or would like to schedule a meeting with us before incorporating any of the above recommendations in the Final EIR, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2017-02730.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse