SUTTER HOSPITAL MEDICAL CENTER: NOP COMMENTS

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7	Golden Gate Bird Alliance
8	Port of Oakland

SECTION 1

PUBLIC COMMENTS

Outlook

Comments on the Scope of the EIR for the Sutter Emeryville Medical Center Project

From Aaron Woolsey <awoolsey@gmail.com>
Date Mon 9/14/2026 4:46 PM
To Miroo Desai <mdesai@emeryville.org>; zunger@oaklandca.gov <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; wgilchrist@oaklandca.gov <wgilchrist@oaklandca.gov>

Dear Ms. Desai, Oakland City Council Members Unger and Brown, and other City of Oakland staff,

I would like to submit my comments on the scope of the environmental impact report and the transportation analysis for Sutter Health's proposed hospital and clinic project in Emeryville. I am a homeowner in Oakland (5553 Marshall Street), where I live about a half mile away from the proposed hospital site. I am sure that many others have commented about the traffic impacts and bike corridor impacts, given the local schools, nursery, parks, etc. I agree with all of those concerns and would like to highlight some others may not have made.

Aesthetics:

The footprint for the site is not adequate for the size of the project. This means that the hospital needs to be built up (13+ stories) to provide the sq. footage required. A building of this size will tower over the quiet residential neighborhood, will cast a large shadow over the neighborhood and be a constant source of night-time light pollution as, being a hospital, it will create ever-present light pollution 24 hours per day every day. It is not clear what the building will look like at this time.

I would recommend that the EIR evaluate the shade impact of the building as well as the light pollution and impact on our neighborhood with some specificity: how will the light pollution affect our view of the starry night sky. As an avid astronomer, I personally would be pretty upset to see fewer stars in the night sky from my backyard. In addition, the EIR should report on the impact of a glass-clad building on reflected sunlight at times of day that might shine glare into the eyes of drivers westbound on 53rd and 55th Streets, and North/South on Hollis and Horton Streets. The EIR should also consider the impact of a brick or cement building on local ambient nighttime temperatures with heat radiance.

If we are going to have a 13+ story building here, I would hope that the city of Emeryville will insist on attractive architecture. We live in a community of artists and it would be disappointing for Sutter to build a monolithic eyesore in our community.

Landscaping/Biological Resources:

The proposed project with the hospital entrance on 53rd Street will require the removal of a number of trees. Furthermore, it will require the removal of the landscaped flower beds on the plaza at Building 2/3 to make way for a driveway from Chiron Way, and finally the shuttle stop in the current space where Hollis Green Park is. The disruption with the shuttle turnout and stop in

Hollis Green Park will render this public green space uninviting as a natural space for our community. The removal of city trees along 53rd Street or Horton is also not something that looks to be replaced in the plan. I would like to see the EIR discuss the impact of the replacement of these natural features, and I would expect that the project would be required to introduce new green spaces of comparable size and impact elsewhere in lieu of the destruction of these. This impact is not only on our community but also the well-being of patients in the hospital. All hospitals benefit from peaceful gardens for patients and their families to rest in. Highland Hospital has beautiful gardens on its grounds, as does Stanford Hospital. Removing the gardens at Building 2/3 and replacing them with a driveway is not, in my opinion, beneficial for the community or patients.

Land Use:

The hospital footprint is too small for the planned facility. Expanding the footprint would solve multiple problems: It would allow the hospital to be built to a smaller height that would fit into the PUD/PDP and would provide more parking spaces for the campus. I would encourage the Planning Commission and City Council to ask Sutter to explore two alternatives:

1) Explore purchasing or leasing property from Grifols:

    a. The property at 4560 Horton Street, which is a large enough property to convert into the main site for the hospital or a wing of the hospital or an additional parking facility. A skybridge overpass could be built to connect the hospital wings on either side of 53rd Street if this property were to be utilized by Sutter. Expanding the footprint of the hospital onto this property would allow it to be built to a more reasonable height that would mitigate many of the problems that a 13-story building causes.

    b. The Grifols parking garage at the corner of Stanford and Horton

    c. The brick building at the corner of 53rd and Horton and the adjacent empty parking lot (both owned by Grifols). This is an IDEAL location that would solve a number of issues. The hospital could potentially be built across Horton Street (allowing for the street to run through it with the mass of the building built as an overpass traversing Horton St., almost doubling the footprint. Alternatively, the shuttle turnout could be located here, using the empty parking lot as a shuttle stop.

    d. Other existing Grifols facilities that could potentially be converted for clinical use.

Transportation:

The transportation analysis as planned in the EIR is inadequate. The EIR should include the impact on intersections at Stanford and San Pablo Ave., Powell St. and Hollis St., 65th St. and San Pablo Ave., 65th and Hollis St., Ashby and San Pablo Ave., etc. The EIR also needs to discuss the noise pollution due to the frequency and volume of sirens that will be crossing these intersections daily. Most ambulances will have to traverse the intersection of Hollis and Powell as well as that of San Pablo and Stanford. In between these there are traffic lights at Beaudry and Powell and Doyle St. and Powell. Each of these intersections, all within a 0.5 mile stretch, will have frequent ambulance crossings. Sutter should report how many ambulances are expected to frequent the hospital site,

leveraging data that they should have on the numbers of ambulances that frequent their current Alta Bates campus, and they should be asked to record of frequency and decibel level of sirens heard at intersections around their current facility at Alta Bates. There are 16 dogs on my very short block of Marshall St. The neighborhood has likely over 60 dogs within a few blocks as well as three dog parks. Just imagine the impact of 24/7 ambulance sirens on all of our pets in the area, as well as the hazard of speeding ambulances through our narrow streets. The EIR should also report how frequently police activity is likely to occur at the hospital or in accompaniment of ambulatory care, based on historical data Sutter should have from their experience at Alta Bates.

The EIR should also look at the impact of gridlock on neighboring city streets, especially during school hours. It should focus on major routes for locals on their way to local shopping districts (Bay Street, Hollis, San Pablo Ave., 40th Street) and being able to navigate our neighborhood with ease. It should consider future traffic-restricting plans like the San Pablo Corridor project, the MLK remodeling project, and the 40th street traffic calming project. It should consider the impact of parking on neighboring streets.

EIR should report on how public transit (preferably electric) improvements might impact traffic and pollution in the area, and what would be required to make these improvements (bus pull outs on Hollis Street that allow traffic to pass easily by local bus stops).

Hazards and pollution:

The facility claims that it will be 100% electric. The community needs to know what the risk and impact would be on the local neighborhood of a battery-related fire at the facility or how a fire or other hazards might impact the nearby PG&E facility and neighborhood, as well as Temescal Creek. We should also know what the potential hazards are to the community from chemicals or reagents that could be released into ground water, soil, or air from both the construction of the facility and its operation once completed.

On the helipad, it is not clear why Sutter requires a helipad at this site. There is a level 1 trauma center at Highland Hospital. Is there a community/county need for another trauma center so close by? It is not clear why we need another at this site. If they are planning an organ transplant center, could they utilize a helipad placed at another location nearby? The EIR needs to report the decibel level expected from a helipad with idling medivac flights for a distance up to at least one mile away from the hospital, along with the likely frequency and times of operation. This should be accounted for in addition to the cumulative effect of police and traffic helicopters which tend to circle our neighborhood given its proximity to the MacArthur freeway maze and frequent traffic jams and accidents.

Thanks for considering my comments.

Sincerely,

Aaron Woolsey

5553 Marshall St., Oakland, CA 94608

awoolsey@gmail.com

(617) 259-7140

Outlook

Comments on the Scope of the EIR for the Sutter Emeryville Medical Center Project

From Andrew Brodie <andygbrodie@gmail.com>
Date Mon 9/14/2026 12:32 PM
To Miroo Desai <mdesai@emeryville.org>

Hello Ms. Desai: I am distressed to see that the City of Emeryville is planning to allow the erection of a MASSIVE medical health center by Sutter in our area. As to why I would have heard about this impending monstrosity on the last day to file, asking for a full environmental report, begs so many questions. Surely the City of Emeryville's planning commission should have gone door to door informing those who will be impacted by such a calamitous decision.

The effects of sirens and helicopters roaring in the neighborhood at all hours, the impact of 3 shifts of medical staff wending their way to work while cutting through the narrow streets of our neighborhoods, and the fact that the center is being built on flood plain (I have two sump pumps on my property alone), does not seem to have been considered. I should add that the list of the downgrades on our daily lives, which you are entrusted to protect, far exceeds the short list that I have outlined.

This development looks to be the abuse of the families of low-income, and moderate income folks, in the area. As a retired public-school teacher and librarian, I cringe at the callousness that this enterprise invokes.

Nobody, but nobody, can, with all good conscience, think this will be an improvement to our lives. An honest appraisal says we are detritus, and money talks. And if you don't think that chaffes, you don't know who we are. The choice is simple: Go to bat for us, or sell us short - way short. We live here, Maroo.

Sincerely,

Andrew Brodie

Miroo Desai
Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

September 14, 2026

RE: Public Scoping Comments and Environmental Requests for Sutter Hospital Medical Center (PUD25-001)

To Miroo Desai,
My name is Angela Gennino, and I am the president of the Golden Gate Community Association (GGCA). We are a nonprofit organization that has served the Golden Gate neighborhood of North Oakland for the past 40 years. GGCA supports community-driven efforts to keep Golden Gate livable and environmentally safe, with streets that enable people to walk, bike, use transit, and drive safely and reliably.

I am submitting the scoping requests in this document on behalf of GGCA for the Environmental Impact Report (EIR) and the non-CEQA transportation analysis being prepared by the consultant, Fehr & Peers, for the proposed Sutter Health Medical Center.

1) TRANSPORTATION: TRAFFIC CORRIDORS

The Draft EIR should expressly evaluate the potential for Sutter Health-related ambulance, employee, patient, visitor, rideshare, delivery, and construction traffic to adversely affect traffic volumes, traffic flow, and the frequency of bottlenecks within the traffic corridors listed below. The Draft EIR should also evaluate the traffic-related secondary environmental impacts, including higher vehicle emissions, increased noise levels, pedestrian and bicyclist conflicts, traffic safety hazards, constraints on emergency access, and cumulative impacts when combined with other development and transportation projects in the area.

A. 53rd STREET CORRIDOR

Currently, 53rd Street functions as the primary east-west crosstown connection between Martin Luther King Jr. Way and Hollis Street, where the project will be located. During the Emeryville Planning Commission meeting on June 25, the applicant's traffic consultant stated that the feasibility traffic study assumed that approximately 5% of the projected 20,000 additional vehicle trips generated by the project area would use 53rd Street east of Hollis Street.

Given the geographic and physical constraints of this narrow, residential Oakland corridor, the introduction of an estimated 1,000 hospital-related vehicle trips per day into a roadway that can become gridlocked by a single stopped truck presents a severe and foreseeable operational hazard. The EIR cannot rely solely on generalized, macro-level traffic models that assume continuous and uninterrupted vehicle flow. Instead, the analysis should include a granular corridor blockage

simulation to evaluate how the routine, day-to-day street obstructions on 53rd Street described below would interact with hospital-related traffic and affect corridor operations.

- 53rd Street: Adeline Street to San Pablo Avenue

  This section of 53rd Street is one of the narrowest, two-way residential streets in Oakland, with only 15 feet or less available for two-way traffic when medium-sized vehicles are parked on both sides of the street, and even less clearance when the parked vehicles are SUVs or trucks. This physical constraint frequently forces drivers to pull over whenever possible to allow oncoming vehicles to pass. It also results in complete roadway blockages in both directions during weekly waste collection, deliveries, and street maintenance activities. Increased Sutter Health-related traffic will likely cause traffic overflow onto Gaskill Street, 54th Street, and San Pablo Avenue as drivers attempt to avoid these blockages.



The photographic documentation of 53rd Street provides direct substantial evidence under **CEQA Guidelines Section 15384** of an existing physical constraint within the baseline transportation grid that the EIR must fully evaluate.

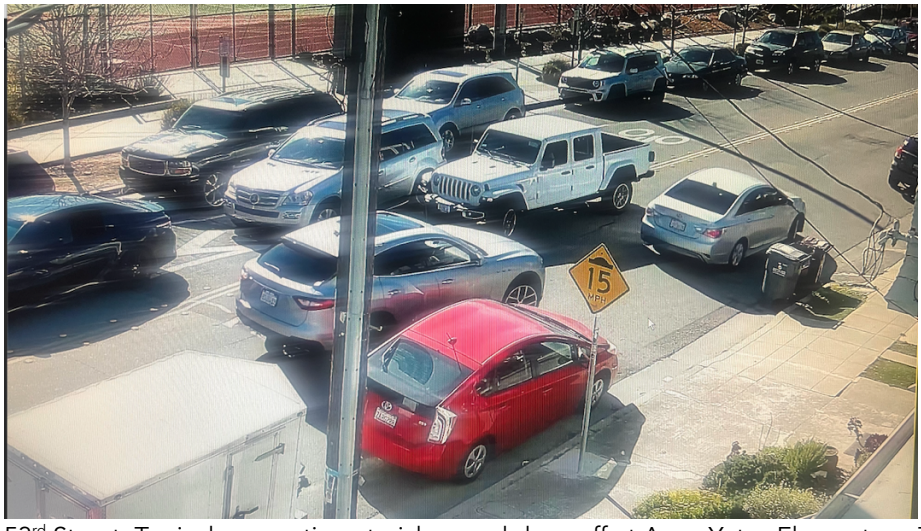
- 53rd Street: San Pablo Avenue Intersection

  The intersection is unaligned (offset/staggered), creating hazardous traffic patterns and maneuvers, including interlocking left turns, "S-curve" movements, vehicle queuing and blocked lanes, pedestrian crosswalk confusion, erratic bicycle movements, and violations of driver expectancy. These conditions intensify during peak traffic periods, including the morning and afternoon student drop-off and pick-up times at Anna Yates Elementary School, located on the southwest corner.



53rd St.& San Pablo Ave. unaligned intersection. This photographic documentation provides direct substantial evidence under **CEQA Guidelines Section 15384** of an existing physical constraint within the baseline transportation grid that the EIR must fully evaluate.

- **53rd Street: San Pablo Avenue to Boyer Street**
  This street is divided along the jurisdictional boundary between Emeryville and Oakland and experiences unique geographic and land-use challenges due to its role as a multi-jurisdictional corridor. In its current configuration, the street cannot accommodate additional hospital-related traffic. Student drop-off and pick-up activities at Anna Yates Elementary School on the Emeryville side already create bottlenecks, high-risk driving maneuvers, and illegal parking on both sides of the street. However, the impacts of a 24/7 increase in westbound traffic to the project site will be borne solely by residents on the Oakland side of the street.



53rd Street: Typical congestion at pickup and drop-off at Anna Yates Elementary. The photographic documentation provides direct substantial evidence under **CEQA Guidelines Section 15384** of an existing physical constraint within the baseline transportation grid that the EIR must fully evaluate.

Legal Relevance under CEQA:
The EIR must analyze how the project's substantial trip generation interacts with narrow residential access corridor of 53rd Street under:

- **Transportation CEQA Appendix G, Section XVI**, (a) to (f)
- **Air Quality CEQA** Appendix G, Section I (b) and (c)
- **Greenhouse Gas Emissions** CEQA Appendix G, Section VII (a) and (b)
- **Hazards and Hazardous Materials** CEQA Appendix G, Section VIII (a) and (b)
- **Noise** CEQA Appendix G, Section XII (a) and (b)
- **Public Services Response Times** CEQA Appendix G, Section XIV (a)

B. SAN PABLO AVENUE CORRIDOR

The Sutter project has not indicated what portion of its estimated 20,000 additional daily vehicle trips will occur along the San Pablo Avenue corridor, which serves as the primary north-south arterial connecting the five cities between Oakland and Richmond. In the absence of this information, the transportation analysis for the project EIR, being conducted by the consulting firm Fehr & Peers, should consider the following factors:

- **The current traffic load** from Ashby Avenue (a probable route from Alta Bates Summit) to Stanford Avenue carries a heavy regional burden, averaging between 20,000 and 27,500 vehicles in a 24-hour day.
- **Future traffic loads** due to Sutter-related traffic increases, including 11 shuttles for employee offsite parking at Alta Bates Berkeley every 5 minutes during peak hours and every 20 minutes off-peak, 4:30 a.m. to 9:00 p.m. and 9:00 p.m. to 2:00 a.m. for on-call service.
- **Detour traffic** onto San Pablo Avenue from Interstate 80 to avoid daily freeway bottlenecks.
- **Current and projected accident rates.** This corridor is Oakland's 2024 High Injury Network because it has the third-highest rate of injury collisions in Alameda County, with pedestrians and bicyclists accounting for 64% of severe injuries and deaths on San Pablo Avenue, despite making up less than 10% of daily travelers.
- **Reduced traffic lanes** by the Alameda County Transportation Commission (ACTC) multimodal project that will reduce two traffic lanes to one as a key traffic-calming change measure.
- **All intersections' configurations** and associated hazards from Ashby Avenue to Stanford Avenue, which is also on the 2024 High Injury Network.

Legal Relevance under CEQA:
The EIR must analyze how the project's substantial trip generation interacts with access and use of the San Pablo Corridor under:

- **Transportation CEQA Appendix G, Section XVI**, (a) to (f)
- **Air Quality CEQA** Appendix G, Section I (a) (b), (c), (d), (e)
- **Greenhouse Gas Emissions** CEQA Appendix G, Section VII (a) and (b)
- **Hazards and Hazardous Materials** CEQA Appendix G, Section VIII (a) and (b)
- **Noise** CEQA Appendix G, Section XII (a) and (b)
- **Public Services Response Times** CEQA Appendix G, Section XIV (a)

C. STANFORD AVENUE CORRIDOR

The Sutter project has not indicated what portion of its estimated 20,000 additional daily vehicle trips to the area will occur along the Stanford Avenue corridor, which appears to serve as a primary route connecting the project site to Alta Bates Summit Medical Center in Berkeley via Ashby and Adeline Avenues.

In the absence of this information, the transportation analysis for the project EIR, being conducted by the consulting firm Fehr & Peers, should consider the following factors:

- **The current traffic load** on Stanford Ave. from Adeline to Vallejo Streets
- **Future traffic load** due to Sutter-related traffic increases, which include 11 shuttles for employee offsite parking at Alta Bates Berkeley operating daily every 5 minutes during peak hours, every 20 minutes off-peak, 4:30 a.m. to 9:00 p.m. and 9:00 p.m. to 2:00 a.m. for on-call service
- **Current and projected accident rates** for Stanford Avenue from San Pablo Avenue to Vallejo Street, which is in Oakland's 2024 High Injury Network because it suffers from a disproportionately high rate of severe and fatal traffic collisions
- **All intersections' configurations** and associated hazards from San Pablo Avenue to Vallejo Street, particularly at Stanford Avenue
- **Speeding and racing** along the Long, wide, and uninterrupted stretches of Stanford Avenue from Market and San Pablo Streets and from San Pablo Avenue to Vallejo Street
- **Lack of traffic-calming infrastructure** such as speed cushions, traffic circles, or bulb-outs along major stretches to naturally force vehicles to slow down

Legal Relevance under CEQA:

The EIR must analyze how the project's substantial trip generation interacts with access and use of the Stanford Corridor under:

- **Transportation CEQA Appendix G, Section XVI**, (a) to (f)
- **Air Quality CEQA** Appendix G, Section I (a) (b), (c), (d), (e)
- **Greenhouse Gas Emissions** CEQA Appendix G, Section VII (a) and (b)
- **Hazards and Hazardous Materials** CEQA Appendix G, Section VIII (a) and (b)
- **Noise** CEQA Appendix G, Section XII (a) and (b)
- **Public Services Response Times** CEQA Appendix G, Section XIV (a)

D. ADELINE STREET CORRIDOR: 55th to 53rd Streets

The Sutter project has not indicated what portion of its estimated 20,000 additional car trips a day to the area that will originate from Highway 24 exits on Martin Luther King Jr. Way and 51st Street, and on Telegraph Avenue at Aileen Street. From those two points, traffic apps direct drivers to the project site via 55th Street, then left on Adeline Street to 53rd Street--a segment currently experiencing increasingly erratic and hazardous traffic behavior, more noise, and frequent crashes due to the growing number of fast-moving food delivery drivers associated with the CloudKitchens (5300 Adeline St.).

Given the factors described above, the transportation analysis for the project EIR being conducted by the consulting firm Fehr & Peers should include the following regarding transportation increases on Adeline Street from 55th to 53rd Streets:

- **The current traffic load**
- **Future traffic load** due to Sutter-related traffic increases.
- **Congestion and road blockages** at the CloudKitchens
- **Hazardous driving** conditions at the CloudKitchens
- **Hazardous intersections** at the 55th T-junction and at 53rd Street, a highly erratic, non-standard intersection alignment and obstruction of sightlines from CloudKitchens' industrial-size dumpsters left on the street, big rig supply trucks parking in the traffic and bike lanes, and delivery drivers parking in the corner red zones.
- **Accident and injury rates**

Legal Relevance under CEQA:
The EIR must analyze how the project's substantial trip generation interacts with access and use of the Stanford Corridor under:

- **Transportation CEQA Appendix G, Section XVI**, (a) to (f)
- **Air Quality CEQA** Appendix G, Section I (a) (b), (c), (d), (e)
- **Greenhouse Gas Emissions** CEQA Appendix G, Section VII (a) and (b)
- **Noise** CEQA Appendix G, Section XII (a) and (b)
- **Public Services Response Times** CEQA Appendix G, Section XIV (a)

2) AIR QUALITY

Oakland residents in all parts of Golden Gate, but especially those living west of San Pablo Avenue from 59th Street to 53rd Street, will be the most affected by pollution related to on-site construction activities as well as truck traffic, worker trips, equipment exhaust, roadway congestion, idling, and associated particulate matter.

EIR must analyze whether heavy construction planned for 6+ years at the project site will:

- Violate applicable air-quality standards
- Result in a cumulatively considerable net increase of criteria pollutants
- Expose sensitive receptors to substantial pollutant concentrations
- Create other localized air-quality effects associated with increased vehicle activity

Legal Relevance under CEQA:
The EIR must analyze the project's substantial construction activities under:

- **Air Quality CEQA Appendix G, Section I**, (a) (b), (c), (d), (e)

3) NOISE & VIBRATIONS

Oakland residents throughout Golden Gate, but especially those living west of San Pablo Avenue between 53rd and 59th Streets, will be exposed to more than six years of excessive project-related construction noise, including jackhammering, drilling, pile driving, heavy machinery alarms, and ongoing helicopter flights. These noise sources can adversely affect the nervous system, cardiovascular health, sleep quality, and cognitive performance.

The EIR scope should evaluate the anticipated noise and vibration levels and assess how they would:

- Violate applicable noise standards.
- Result in a cumulatively considerable increase in noise and vibration pollution.

- Extend along construction truck routes, affecting sensitive receptors and other residents who live, work, or spend time along those routes.
- Create other localized noise impacts associated with project-related construction activities.

Legal Relevance under CEQA:
The EIR must analyze how the project's construction activities impact under:

- **NOISE CEQA** Appendix G, Section XII (a) (b), (c), (d), (e), (f)

Sincerely,
Angela Gennino
On behalf of the Golden Gate Community Association (GGCA)
goldengateca.org
510-551-1013

Outlook

Sutter Health's Proposed Plan Does Not Work for Our Community - Ashley Yue

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From Ashley Yue <ashyue@berkeley.edu>
Date Wed 9/2/2026 11:32 AM
To Miroo Desai <mdesai@emeryville.org>

I request that the EIR analyze 5300 Chiron Way during school hours of year 2026-2036. Existing conditions include lane blockage, turning conflicts, noise events and project elements like added trips, shuttle operations, off-site parking, construction phases, helipad activity, or diverter changes may worsen conditions. Please evaluate this issue under Appendix G

- Transportation (safety, circulation policy conflicts, emergency access)
- Air Quality (sensitive-receptor exposure)
- Noise (temporary and permanent increases)
- Hazards and Hazardous Materials
- Cultural and Tribal Cultural Resources
- Recreation

, disclose assumptions and methods, and identify feasible mitigation with measurable performance standards, monitoring, and corrective-action triggers.

Sutter Health's Proposed Plan Does Not Work for Our Community- It's too big, it's too expensive, it's too damaging.

Regards,

Ashley Yue
Neighborhood Constituent

Society & Environment B.S. | UC Berkeley
Occupied Ohlone Territory, Huichin
Ashyue@berkeley.edu

Miroo Desai, AICP
Planning Manager, City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

September 5, 2026

Submitted via email to mdesai@emeryville.org

RE: Comments on the Notice of Preparation (NOP) for the Sutter Emeryville Medical Center Project Environmental Impact Report — Construction-Period Health and Safety Impacts on Nearby Residents

Dear Ms. Desai and Members of the Planning Commission:

I submitting these comments on the scope and content of the Environmental Impact Report (EIR) for the Sutter Emeryville Medical Center Project (the "Project"), in response to the Notice of Preparation dated August 13, 2026, and in connection with the August 27, 2026 EIR Scoping Session. I live in Emery Bay Village, a 7-acre residential community located one block from the Project site and within the 1,500-foot notification radius identified in the NOP.

My comments focus on the health and safety impacts of the Project's extended construction period on residents living in close proximity to the site, including children and senior residents who are more vulnerable to construction-related exposures and disruptions.

1. Construction Duration and Cumulative Exposure

According to the NOP, the Project would be phased over approximately 10 years, with hospital construction (Building 8) alone expected to take 71 months, with overlapping construction of Building 2/3, Building 4, and Building 1. This is an **unusually long** construction timeline for a site directly adjacent to occupied residential buildings. Residents within 1,500 feet — including my household — would be exposed to construction-related noise, dust, truck traffic, and hazardous material disturbance for the better part of a decade.

I request that the EIR explicitly analyze the cumulative, long-duration nature of this exposure, rather than treating construction impacts as a short-term or transient condition. The EIR should disclose a phase-by-phase construction schedule and identify which project phases pose the greatest risk to nearby residents so that mitigation can be tailored accordingly.

2. Hazardous Materials and Contaminated Soil/Groundwater

The NOP discloses that the Project site includes multiple properties with documented soil and groundwater contamination, including open Cleanup Program Sites under long-term regulatory management for arsenic, polychlorinated biphenyls (PCBs), tetrachloroethylene (PCE), trichloroethylene (TCE), 1,2,3-trichloropropane (TCP), benzene, naphthalene, and total petroleum hydrocarbons, among other contaminants. Several parcels are subject to recorded Land Use Covenants and Environmental Restrictions due to this residual contamination.
Given that the Project involves excavation, foundation work for a 330-foot tower, and demolition of existing structures — activities that will disturb soil and potentially groundwater across a 12-acre site for years — I am requesting that the EIR include the following in its Hazards and Hazardous Materials analysis:

- A construction-specific Health and Safety Plan (CHASP) that addresses handling and disposal of contaminated soil and groundwater discovered during excavation, dewatering, or foundation work.
- Real-time perimeter air monitoring for volatile organic compounds (VOCs) and particulate matter during all ground-disturbing activities, with publicly accessible results and pre-defined action levels that trigger work stoppage.
- Dust suppression and control measures (e.g., water application, covered haul trucks, wheel washing) sufficient to protect nearby residents, and a description of how compliance will be enforced and communicated to the public.
- A protocol for unanticipated discovery of contamination beyond what is currently documented, including immediate notification procedures for adjacent residents.
- Groundwater dewatering management, including how contaminated groundwater would be treated, transported, and disposed of, and the associated truck routes.

3. Protection of Sensitive Populations — Children and Seniors

The Project site is within close proximity to Happa Baby School, the Emeryville Child Development Center, Emery High School, and Anna Yates Elementary, as well as senior residents in nearby residential communities, including my own. Children and older adults are recognized as more vulnerable to airborne particulate matter, VOC exposure, and noise-related stress than the general population.

I request that the EIR:

- Specifically evaluate construction-period air quality and hazardous material exposure risk to sensitive receptors (schools, childcare facilities, & senior residents) within 1,500 feet of the site, not just the general population.
- Identify feasible mitigation measures tailored to these populations, such as restricting the highest-emission construction activities (e.g., major excavation, demolition) during school arrival/dismissal hours, and providing advance notice to nearby residents and schools before high-impact work begins.
- Establish a direct, ongoing communication channel (e.g., a construction hotline, email alerts, or regular community updates) so that residents are informed of upcoming high-impact activities, monitoring results, and any exceedances.
- Evaluate construction noise and vibration impacts on adjacent residential structures, including potential structural monitoring for buildings within close proximity to excavation and pile-driving or foundation activities.

4. Construction Traffic, Site Security, and Emergency Access

Given the multi-year construction period, I request that the EIR evaluate:

- Designate haul truck and construction vehicle routes that avoid residential streets adjacent to the Emery Bay Village, along with hours of operation for construction traffic.
- Site security and fencing measures during the extended construction period to prevent unauthorized access and to address the safety of pedestrians and cyclists navigating altered routes around the site for up to a decade.
- Maintenance of safe, continuous emergency vehicle access to surrounding residential blocks throughout all phases of construction, including periods when Horton Street & other adjacent streets are impacted by construction activity.

5. Requested Mitigation Monitoring and Reporting

I request all mitigation measures adopted for construction-period hazards be enforceable and independently verifiable — not simply best-practice recommendations — and that the City commit to a mitigation monitoring and reporting program (MMRP) that includes periodic public reporting throughout the 10-year construction period, with a clear mechanism for residents to report concerns and receive a timely response.

Given the scale, duration, and documented hazardous materials history of this site, a thorough, transparent construction-period health and safety analysis is essential to protect the residents living in the immediate vicinity of the Project. Please add me to the list of interested parties to receive further notices regarding this Project, including release of the Draft EIR.

Sincerely,
Baruch Golden
64 Emery Bay Dr., Emeryville, 94608
baruchg50@hotmail.com
Resident, Emery Bay Village condos

Outlook

Financial Aspects of the Sutter Proposal

From wreuter493@aol.com <wreuter493@aol.com>
Date Sat 9/5/2026 11:08 AM
To Miroo Desai <mdesai@emeryville.org>
Cc Chadrick Smalley <csmalley@emeryville.org>; Website DL - City Manager's Office <city_manager@emeryville.org>; Courtney Welch <cwelch@emeryville.org>; Matthew Solomon <matthew.solomon@emeryville.org>; David Mourra <David.Mourra@emeryville.org>; Kalimah Priforce <priforce@emeryville.org>; Sukhdeep Kaur <Sukhdeep.kaur@emeryville.org>

1 attachment (15 KB)
To City Council Sutter.docx;

Dear Miroo,

Regarding the Sutter proposal, please see my e-mail of September 17 sent to City Council members with copies to Chad Smally and the City Manager. It focuses on the long-term effect of the project on city finances, but it also has application to the EIR study presently underway. If there is less money, both in the next decade and long term available to the city to cope with environmental challenges in all the many ways they might arise, then the present study should begin to address the financial side of the issue.

For your convenience, I have attached a copy of the September 17 e-mail.

Thanks for your attention to this, and thanks to you and the other city staffers who are working on the Sutter proposal. You are ensuring all legal requirements and city policies are in the mix. Keep up the good work.

Sincerely,

Bill Reuter

2 Commodore Drive, #175, Emeryville, CA 94608

Wreuter493@aol.com

To City Council, copies to Smally and City Manager

The Sutter project presents us with a serious problem: how will it pay out for the city in the long term? As the former chair of the Budget Advisory Committee (then called the Financial Advisory Committee) for almost ten years and a resident member of the Economic Advisory Committee for the same period, the members of these committees and I focused on making sure benefits would top costs, not just for a few years but many. So too did staff financial officers and city councilors who sat with us. Given what Sutter asks of the city in terms of location, environmental concerns, changes in the city's traffic plans for both cars and bike ped routes, the impact of the facility on educational assets, the disruptions in the lives of people who live near the site and even on many who live well beyond it, both during the many months of construction and thereafter with the movement of land and air emergency vehicles, I can't see how this development pays it's way. All this without even mentioning it will be tax free for such a facility by state law.

I've lived in Emeryville since 1979, in a neighborhood now enriched by the presence of scores of younger men and women doing interesting work and, in some cases, also raising children. In the long term a bad decision on Sutter won't do me much harm. I turn 93 next month. But my valuable neighbors will suffer from it. Admiring them as I do, I don't what that to happen. Nor do I wish to see my vital and dynamic city crippled by a short-sighted financial move.

Thank you for your thoughtful attention to this issue.

Sincerely,

Bill Reuter

2 Commodore Dr. #175

Emeryville.

September 14, 2026

Miroo Desai, Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608
mdesai@emeryville.org

RE: Public Scoping Comments on the Notice of Preparation of a Draft Environmental Impact Report, Emeryville Sutter Hospital Medical Center Project (PUD25-001)

Dear Ms. Desai:

My name is Bobbi Lopez. I am an Oakland resident in the Golden Gate neighborhood, and I live approximately 528 yards from the project site. I am submitting these comments on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for the Sutter Hospital Medical Center project, and I request that they be entered into the administrative record for PUD25-001.

I support a new full-service hospital in the East Bay. Emergency and inpatient capacity, labor and delivery services, and skilled jobs are real benefits to this region, and I want this project to succeed. I am writing because a hospital built to protect health should not damage the health of the households closest to it, and because the streets my family uses every day sit outside the study area the applicant has described so far despite being so close to the project and utilizing our street for the transport of materials as well as adding 20,000 vehicle trips to our street that decreases air quality.

My comments fall into four areas and are largely impact by my son and myself who are living with asthma: (1) sensitive receptor status and the geographic scope of the study area; (2) hazardous materials and soil disturbance; (3) air quality; and (4) transportation, pedestrian, and bicycle safety, including one intersection, Marshall Street and Stanford Avenue, that appears to be excluded from analysis entirely.

1) STUDY AREA AND SENSITIVE RECEPTORS

I live roughly 528 yards, about three tenths of a mile, from the project site. My household includes two people with asthma, my son and myself. We are precisely the population that CEQA treats as sensitive receptors, and we are close enough to the site that construction emissions, soil disturbance, haul routing, and long-term traffic increases will reach us directly.

The project as described would construct a 785,000 square foot, 330-foot hospital with 325 beds, reuse approximately 1.4 million square feet of medical office space, and generate roughly 2,825 daily personnel and 12,060 daily visitors, with public testimony describing approximately 20,000 additional daily vehicle trips. Hospital construction alone is projected at 71 months, within a phased buildout running into 2035. For a household with asthma located three tenths of a mile away, that is not a temporary condition. That is the entirety of my son's remaining time at home.

I therefore request that the EIR:

- Establish a study area for air quality, noise, hazardous materials, and transportation that extends into Oakland and includes Oakland side receptor and analysis locations, rather than terminating at the Emeryville jurisdictional boundary.

- Identify sensitive receptor locations in the Golden Gate neighborhood west of San Pablo Avenue, including residences, and analyze impacts at those locations rather than at the project boundary alone.
- Use Oakland adopted plans and standards, including Oakland's 2024 High Injury Network and Oakland's safety and transportation plans, as the applicable plan consistency baseline for impacts occurring on Oakland streets.

Legal Relevance under CEQA:

- Air Quality, Appendix G, Section III (a) through (d), including exposure of sensitive receptors to substantial pollutant concentrations
- Hazards and Hazardous Materials, Appendix G, Section IX
- Noise, Appendix G, Section XIII
- Transportation, Appendix G, Section XVII
- Cumulative impacts, CEQA Guidelines Section 15130

2) HAZARDOUS MATERIALS AND SOIL DISTURBANCE

This is a former life sciences and industrial campus with a documented contamination history. The NOP identifies open or closed cleanup cases involving chlorinated solvents and other contaminants of concern, including trichloroethylene (TCE), tetrachloroethylene (PCE), benzene, arsenic, and PCBs, and recorded land use covenants restricting certain sensitive uses on portions of the site.

Excavating and hauling that soil, over a construction period of roughly six years, adjacent to three schools and dense residential neighborhoods in both cities, is a serious undertaking. Vapor intrusion, fugitive dust carrying metals and PCBs, and truck spillage along haul routes are all foreseeable pathways by which site contamination reaches people who do not live on the site.

I request that the Draft EIR:

- Disclose the full regulatory status of every cleanup case and land use covenant affecting the project site, including the responsible oversight agency and the specific restrictions each covenant imposes.
- Analyze whether converting this site to a hospital, a labor and delivery unit, a neonatal intensive care unit, and medical offices is consistent with the existing land use covenants, and disclose what covenant amendments or agency approvals would be required.
- Require a soil and groundwater management plan prepared under active state oversight, included in the Draft EIR as an enforceable mitigation measure rather than deferred to a future permit.
- Evaluate vapor intrusion risk for both on site occupants and off site residences, and identify vapor control requirements.
- Specify haul routes for contaminated soil, require covered loads and truck wheel washing, and prohibit haul routing on 53rd Street, Stanford Avenue west of San Pablo Avenue, and other residential streets.
- Require perimeter and community air monitoring during all excavation and soil disturbance, with publicly posted results and defined action levels that trigger work stoppage.

- Require advance written notice to neighboring residents in both Emeryville and Oakland before excavation, soil hauling, or any activity with the potential to release contaminants.

Legal Relevance under CEQA:

- Hazards and Hazardous Materials, Appendix G, Section IX (a), (b), (d), and (e)
- Air Quality, Appendix G, Section III (b), (c), and (d)
- Deferred mitigation, CEQA Guidelines Section 15126.4(a)(1)(B)

3) AIR QUALITY

Six or more years of continuous heavy construction, including demolition, excavation, pile driving, and diesel equipment operation, will occur upwind and uphill of a residential neighborhood that already carries an elevated asthma burden. Once the hospital opens, the project adds roughly 20,000 daily vehicle trips, an ambulance operation, a helipad with approximately one round trip flight per day including nighttime hours, and a shuttle fleet of approximately 11 vehicles operating every five minutes during peak periods.

I request that the Draft EIR:

- Prepare a construction period health risk assessment that models diesel particulate matter, PM2.5, and toxic air contaminants at Oakland residential receptor locations, including locations west of San Pablo Avenue between 53rd Street and 59th Street, and not solely at the project fence line.
- Evaluate cumulative air quality impacts in combination with other development and transportation projects in the area, including Interstate 80 and San Pablo Avenue corridor traffic.
- Analyze asthma and respiratory outcomes specifically, given the documented asthma prevalence in North Oakland, rather than relying on a generalized cancer risk threshold alone.
- Require, as enforceable mitigation in the Draft EIR: Tier 4 Final or zero emission off road construction equipment, no idling enforcement, enhanced dust control, and real time air quality monitoring with publicly accessible data and defined response thresholds.
- Analyze operational emissions from ambulances, the helipad, the shuttle fleet, delivery vehicles, and queuing at drop off zones, including their effects along Oakland access routes.

Legal Relevance under CEQA:

- Air Quality, Appendix G, Section III (a), (b), (c), and (d)
- Greenhouse Gas Emissions, Appendix G, Section VIII (a) and (b)
- Cumulative impacts, CEQA Guidelines Section 15130

4) TRANSPORTATION: MARSHALL STREET AND STANFORD AVENUE

The intersection of Marshall Street and Stanford Avenue does not appear anywhere in the transportation analysis described to date, in the applicant's materials, or in the corridors the consultant has identified. It should be studied, and here is why.

Stanford Avenue is a primary east to west route connecting the project site to Oakland and to Alta Bates Summit Medical Center in Berkeley. It is on Oakland's 2024 High Injury Network, which comprises the 8

percent of Oakland streets that account for 60 percent of the city's severe and fatal collisions. Marshall Street and Stanford Avenue is a crossing used constantly by small children, older adults, dog walkers, and people traveling on foot to and from school, transit, and the shopping on San Pablo Avenue.

The existing conditions at this intersection are as follows:

- There is nothing on Stanford Avenue that causes drivers to slow down. There are no speed bumps, no speed cushions, no traffic circles, no bulb outs, and no other vertical or horizontal traffic calming along the long, straight, uninterrupted stretches of the street.
- The intersection itself is in a dilapidated condition, including degraded crosswalk markings and worn pavement, covered pedestrian signs, which further reduces driver yielding and pedestrian visibility.
- Speeding and racing occur regularly along this stretch, and sideshows have blocked the corridor entirely, which is incompatible with emergency vehicle access to and from a hospital.

Also the intersection of Stanford and San Pablo is of grave concern.

The existing conditions at this intersection are as follows:

- The intersection is posted no turn on red, and that restriction is routinely ignored.
- Drivers run the red light at this intersection constantly, not occasionally.
- There is nothing on Stanford Avenue that causes drivers to slow down. There are no speed bumps, no speed cushions, no traffic circles, no bulb outs, and no other vertical or horizontal traffic calming along the long, straight, uninterrupted stretches of the street.
- The intersection itself is in a dilapidated condition, including cross walk markers that are no longer visible, non-working pedestrian signals.
- Multiple crashes occur along Stanford which has resulted in injury and property damage.
- Speeding and racing occur regularly along this stretch, and sideshows have blocked the corridor entirely, which is incompatible with emergency vehicle access to and from a hospital.

Adding a 24-hour hospital campus with roughly 20,000 daily trips, ambulance traffic, and a continuous shuttle operation to a corridor with these conditions is a foreseeable safety impact, not a speculative one. A traffic study that omits the intersection entirely cannot support a finding that the impact is less than significant.

I request that the Draft EIR and the accompanying transportation analysis:

- Add Marshall Street and Stanford Avenue and ensure Stanford and San Pablo to the transportation study area, with existing and projected turning movement counts, pedestrian and bicycle counts, and a five-year collision history.
- Add Marshall and 59th Street as an area where cars might cut across and speed down residential streets.
- Document observed red light running and no turn on red violation rates at this intersection, and analyze how project generated volumes would change pedestrian exposure and conflict frequency.
- Document how many cars do not stop for pedestrians.
- Document how many cars are speeding 10 miles over the speed limit.

- Analyze pedestrian crossing conditions specifically for children, older adults, and people with mobility limitations, including crossing distance, signal timing, sight lines, and crosswalk condition.
- Evaluate the physical condition of the intersection, including crosswalk markings, signage, lighting, and pavement, as part of the baseline rather than assuming standard conditions.
- Identify feasible mitigation, including traffic calming on Stanford Avenue such as speed cushions, raised crosswalks, curb extensions, leading pedestrian intervals, hardened centerlines, signal timing changes, and automated enforcement, and evaluate a project funded contribution toward those improvements.

Legal Relevance under CEQA:

- Transportation, Appendix G, Section XVII (a) through (d), including substantially increasing hazards due to a geometric design feature or incompatible use, and inadequate emergency access
- Land Use and Planning, Appendix G, Section XI (b), conflict with an adopted plan or policy adopted for the purpose of avoiding or mitigating an environmental effect, including Oakland's High Injury Network and safety plans
- Public Services, Appendix G, Section XV (a), emergency response times

5) TRANSPORTATION: STANFORD AVENUE AND SAN PABLO AVENUE CORRIDORS

I raise these corridors again, having raised them previously, because they remain inadequately scoped. The applicant has not disclosed what share of the approximately 20,000 daily trips will use Stanford Avenue, San Pablo Avenue, or Market Street. Counts taken at the Powell Street interchange are not a valid stand in for conditions at Stanford Avenue and San Pablo Avenue. My own review of available volume data indicates the project could approach a doubling of volume at that intersection.

I request that the Draft EIR:

- Extend the study area to Stanford Avenue from San Pablo Avenue to Market Street and to Vallejo Street, San Pablo Avenue from Ashby Avenue to Stanford Avenue, and Market Street.
- Disclose the assumed trip distribution across Oakland corridors and the basis for those assumptions.
- Analyze the interaction between project traffic and the Alameda CTC San Pablo Avenue multimodal project, which reduces travel lanes along this corridor.
- Analyze the shuttle operation, approximately 11 vehicles every five minutes during peak hours and operating from 4:30 a.m. to 2:00 a.m., along its actual Oakland routes, including the effect on residential streets.
- Analyze parking spillover onto Oakland residential streets given 2,825 daily personnel and 2,044 proposed spaces.

Legal Relevance under CEQA:

- Transportation, Appendix G, Section XVII (a) through (d)
- Air Quality, Appendix G, Section III (b) and (d)
- Noise, Appendix G, Section XIII (a)

6) PEDESTRIAN AND BICYCLE SAFETY MUST BE ANALYZED AS A CEQA IMPACT

SB 743 removed automobile delay and level of service from CEQA and replaced it with vehicle miles traveled. It did not remove safety. I am concerned that pedestrian and bicycle safety analysis for this project will be placed in the non CEQA portion of the transportation study, where findings are informational and cannot be challenged.

I request that pedestrian and bicycle safety impacts, including those on Stanford Avenue, Marshall Street, San Pablo Avenue, 53rd Street, and the Horton Street and 53rd Street bicycle boulevards, be analyzed within the EIR as significance determinations under Appendix G Section XVII (c) and (d), with mitigation measures and alternatives, and as plan conflicts under Section XI (b). Please also analyze the proposed removal of the Horton Street traffic diverter as a project impact on bicycle and pedestrian circulation, including the resulting diversion of traffic onto Oakland streets.

7) NOISE

Please analyze construction noise and vibration, including pile driving, at Oakland receptor locations, and analyze helipad operations, including approximately one round trip flight per day with nighttime operations, along actual flight paths. Flight paths have not been disclosed. Please also analyze ambulance siren noise along Oakland access routes as an operational impact.

Legal Relevance under CEQA:

- Noise, Appendix G, Section XIII (a), (b), and (c)

8) NO DEFERRED MITIGATION

Finally, and importantly: please do not defer the construction traffic management plan, the haul route plan, the soil and groundwater management plan, the air monitoring plan, or the transportation demand management program to a condition of approval or a post approval permit. Under CEQA Guidelines Section 15126.4(a)(1)(B), mitigation may not be deferred to a future undefined plan. These plans should be included in the Draft EIR, with performance standards, so that the public can review and comment on them before the project is approved.

Thank you for your consideration. Please add me to the notification list for the Draft EIR and for all public hearings on this project. I intend to comment on the Draft EIR when it is released.

Respectfully submitted,

Bobbi Lopez
Lopezbobbi@gmail.com
Stanford Avenue

CC: Oakland Mayor Barbara Lee; Oakland Councilmember Zach Unger, District 1; Oakland Department of Transportation; Oakland Planning Dept.

Outlook

Subject: Notice of Preparation (NOP) Scoping Comments - Sutter Health Emeryville Medical Center (5300 Chiron Way)

From Bonnie Eslinger <bonnieeslinger@yahoo.com>
Date Mon 9/14/2026 7:54 AM
To Miroo Desai <mdesai@emeryville.org>; Jeff Johnson <pegasusgiraffe@yahoo.com>

September 13, 2026
To: Miroo Desai, Planning Manager
City of Emeryville, Planning Division
1333 Park Avenue, Emeryville, CA 94608
Via Email: mdesai@emeryville.org

Subject: Notice of Preparation (NOP) Scoping Comments - Sutter Health Emeryville Medical Center (5300 Chiron Way)

Dear Ms. Desai,
My name is Bonnie Eslinger and I am a 20-year resident of Emeryville.
While I support the idea of a hospital in Emeryville, the Sutter hospital proposed is too large and I do not believe the City of Emeryville/Emeryville City Council Members should amend the existing Chiron PUD/PDP and General Plan to accommodate Sutter's proposed hospital. It's my understanding that hospital use is not currently permitted under the applicable Office/Technology land-use designation and Sutter is also proposing a 330-foot building where the existing PUD/PDP permits a maximum height of 225 feet.
My husband and I participated in General Plan meetings some years ago and appreciated the comprehensive way the city looked at traffic, housing needs, commercial demands, appropriate uses, environmental concerns, etc. I am curious why the city leaders are now considering making a piecemeal change.
A 785,000-square-foot, 330-foot, 24-hour hospital will have significant traffic and environmental impacts to our small community. Those impacts need to be evaluated thoroughly and presented honestly to the community. That study should include all possible routes to the hospital and the surrounding feeder roads, including Powell, San Pablo and 40th Street. It also needs to include the expected parking deficit (I've been told the NOP identifies a potential on-site parking deficit of approximately 585 spaces) and the impacts of frustrated drivers circling our neighborhoods looking for free/available parking (and the impacts to local businesses that lose customers as a result). educe the project's scale. The EIR should also analyze whether the resulting traffic friction, double-parking, and neighborhood congestion will impede Emergency Vehicle Access (EVA) for ambulances and block vulnerable patients from accessing the facility.

Thank you,
Bonnie Eslinger
1275 62nd Street, Emeryville, 94608\
bonnieeslinger@yahoo.com

Bonnie Eslinger
415-535-0431

Outlook

Public Scoping Comments and Environmental Requests for Sutter Hospital Medical Center (PUD25-001)

From Brandon Soublet <brandon@brandonsoublet.com>
Date Mon 9/14/2026 10:54 AM
To Miroo Desai <mdesai@emeryville.org>
Cc assemblymember.mbonta@assembly.ca.gov <assemblymember.mbonta@assembly.ca.gov>; senator.arreguin@senate.ca.gov <senator.arreguin@senate.ca.gov>; dave.brown2@acgov.org <dave.brown2@acgov.org>; savannah.parket@acgov.org <savannah.parket@acgov.org>; Briana.brown2@acgov.org <Briana.brown2@acgov.org>

1 attachment (6 MB)
Scoping Letter - Emeryville compressed.pdf;

Miroo Desai, AICP, Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608
mdesai@emeryville.org

Subject: Public Scoping Comments and Environmental Requests for Sutter Hospital Medical Center (PUD25-001)

Dear Ms. Desai:

This letter serves as my formal scoping request for the Sutter Hospital Medical Center Environmental Impact Report. My concerns are centered around 53rd Street (and, by extension, Emery Bay Drive and Temescal Circle), construction, energy use, and emergency response.

53rd Street

53rd Street is home to Anna Yates, the city's only traditional TK-8 school, and the Emeryville Child Development Center. 53rd Street between San Pablo Avenue and Boyer Street has the highest concentration of children in our city by far. The situation outside the school is gridlocked for parents, traps neighbors' cars in their driveways, and, most importantly, is incredibly unsafe for children.

Every school day, three times a day, 53rd Street west of San Pablo Avenue descends into chaos. Parents double park and leave their vehicles to walk their children to the school entrance (see exhibits A and B) . Drivers park across, or even in, driveways (and since they are on the north side of the street, they are in Oakland), making it impossible for neighbors to leave their homes. Traffic (including cyclists) routinely uses the opposing vehicular lane to bypass bottlenecks, using the wrong side of the road until they can pass through the school zone (see exhibits C through F). Drivers make u-turns and three-point

turns mid-block rather than using the installed traffic circle near Boyer Street (see Exhibit G). Children are dropped off on the north side of 53rd Street (in Oakland) and jaywalk across this unpredictable traffic. The current situation is failing our neighbors, our parents, and our children.

According to the American Academy of Pediatrics, most children cannot safely cross the street without an adult present until they are 10 years old. Since the introduction of universal transitional kindergarten in California, there are children as young as four on the school site. The majority of students at a TK-8 school simply should not be walking alone, yet the Anna Yates site design makes it incredibly difficult for parents to safely get their children to the school gate.

Introduction of thousands of vehicle trips per day into this vital corridor could prove deadly. Drivers rushing to the hospital with an emergency are not going to cautiously drive 15 mph through a school zone, being careful to make sure children don't pop out from behind parked cars. Ambulances trying to access the hospital site would regularly find the street completely blocked in both directions, delaying critical care to their patients. The EIR and traffic study must determine the effect this project would have on child safety and emergency response times. In addition to measuring traffic at AM and PM peak hours, Task 2 of the SOW must be expanded to measure and model traffic at school pick up times (1-1:45pm and 3-4pm) to determine whether this highly vehicle-centric project represents an incompatible use with the presence of a school full of vulnerable children.

Poor signal timing coordination on San Pablo Avenue between 47th Street and 53rd Street means that traffic backs up into the intersection at 53rd Street (see Exhibit H). The EIR must study applicant-funded traffic safety measures, including restructuring the dropoff area on 53rd Street.

The block of 53rd Street between San Pablo Avenue and Boyer Street is not the only problematic stretch of road. As part of the project to improve Hollis Street, bus bump outs were installed to slow traffic and increase pedestrian safety. However, when AC Transit or Emery-Go-Round buses stop to pick up or drop off passengers, traffic backs up into the intersection of 53rd Street and Hollis Street (see exhibits I and J). Drivers unwilling to wait for the road to be clear drive in opposing lanes of traffic to bypass the bottlenecks (see Exhibit K). The EIR and associated traffic study must address the impact of bus dwell times and complete blockage of that key intersection on emergency vehicle access to the hospital and air quality in the area from idling vehicles.

The Hollis Street redesign also included marked parallel parking spaces between the bus pads on 53rd Street and 45th Street (see Exhibit L). Since the applicant will charge for their parking garage (which they've already admitted leaves them at a parking deficit), hospital visitors will naturally seek the free options in the area, creating more traffic gridlock and pollution from idling vehicles searching for parking.

This problem will also be felt down 53rd Street, where parking is largely unrestricted, and on Emery Bay Drive and Temescal Circle, which are private roads (see exhibits M through O). Unauthorized parkers will result in increased calls to Emeryville PD, who routinely instruct Emery Bay Village residents to immediately report suspicious or uninvited people. These two areas also happen to be adjacent to Anna Yates and ECDC, and are home to a significant number of seniors, meaning sensitive receptors will be exposed to elevated levels of particulates and other harmful substances from increased traffic. 53rd Street is also the lone entry and exit point for the 112 housing units in Emery Bay Village, so blockages trap residents in the neighborhood. The EIR should evaluate mitigations such as an applicant-funded

Residential Parking Permit program and private security patrols in these areas to prevent them from becoming hospital spillover.

Construction

Like much of Emeryville, this project site sits on a brownfield. While remediation has taken place in recent years, I am concerned that remediation did not reach the depths required by this project. A 330-foot tall hospital tower requires significantly deeper piles and foundations than the average building. The EIR must study the level to which soil at the project site might still be contaminated at the depths required for such a tall building. Additionally, the EIR must study the extent to which contaminants in the soil might shift from the project site to adjacent areas (especially nearby residential neighborhoods and protected wetlands) as a result of construction. Additionally, the EIR should evaluate using pre-drilled holes to minimize the impact of pile driving on potentially sensitive soil and on neighborhood noise.

Energy use

The applicant is proposing an all-electric hospital facility. While the goal of reducing fossil fuel use is commendable, a 785,000 square foot hospital cannot generate all of the electricity it needs on-site, especially given that the helipad precludes rooftop solar arrays. Additionally, there is an existing resource-intensive data center at 53rd Street and Hollis Street between the hospital site and Emery Bay Village. Per CEQA Appendix G Section V (Energy), the EIR must study the effects of an all-electric hospital of this magnitude on local power generation, transmission, and distribution.

Emergency response

A specialized facility of this scale requires specialized training and equipment for first responders. Emeryville's two fire stations are not equipped to respond to emergencies at a 330-foot tall 785,000-square-foot hospital with a helipad. The City of Emeryville and Alameda County should not have to shoulder the cost to train our firefighters for such an unusual use case. Additionally, any major emergency at such a facility would require a significant mutual aid response from other local fire departments. Under CEQA Appendix G Section XV (Public Services), the EIR must study the staffing, equipment, and facilities upgrades required for Alameda County Fire Department to serve such a large specialty medical campus without degrading response times for other city emergencies.

No project alternative

As a reasonable project alternative, the EIR should study the impact of the applicant bringing the existing Alta Bates hospital facility into seismic compliance rather than abandoning it for a new facility in Emeryville. The applicant has not shared with the community why this site was selected or whether renovating Alta Bates was seriously considered, despite proclaiming the need to fill the hospital desert between Oakland and Richmond. Choosing a project site that is even closer to their Oakland hospital than Alta Bates calls into question the efficiency of building in Emeryville to close that gap.

Thank you,
Brandon Soublet
Emery Bay Village resident

CC: Office of Assemblymember Mia Bonta
Office of Senator Jesse Arreguin
Office of County Supervisor Nikki Fortunato-Bas

Attachments:
PDF of this email with Exhibits A through O

Miroo Desai, AICP, Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608
mdesai@emeryville.org

Subject: Public Scoping Comments and Environmental Requests for Sutter Hospital Medical Center (PUD25-001)

Dear Ms. Desai:

This letter serves as my formal scoping request for the Sutter Hospital Medical Center Environmental Impact Report. My concerns are centered around 53rd Street (and, by extension, Emery Bay Drive and Temescal Circle), construction, energy use, and emergency response.

53rd Street

53rd Street is home to Anna Yates, the city's only traditional TK-8 school, and the Emeryville Child Development Center. 53rd Street between San Pablo Avenue and Boyer Street has the highest concentration of children in our city by far. The situation outside the school is gridlocked for parents, traps neighbors' cars in their driveways, and, most importantly, is incredibly unsafe for children.

Every school day, three times a day, 53rd Street west of San Pablo Avenue descends into chaos. Parents double park and leave their vehicles to walk their children to the school entrance (see exhibits A and B) . Drivers park across, or even in, neighbors' driveways, making it impossible for them to leave their homes. Traffic (including cyclists) routinely uses the opposing vehicular lane to bypass bottlenecks, using the wrong side of the road until they can pass through the school zone (see exhibits C through F). Drivers make u-turns and three-point turns mid-block rather than using the installed traffic circle near Boyer Street (see Exhibit G). Children are dropped off on the north side of 53rd Street and jaywalk across this unpredictable traffic. The current situation is failing our neighbors, our parents, and our children.

According to the American Academy of Pediatrics, most children cannot safely cross the street without an adult present until they are 10 years old[1]. Since the introduction of universal transitional kindergarten in California, there are children as young as four on the school site. The majority of students at a TK-8 school simply should not be walking alone, yet the Anna Yates site design makes it incredibly difficult for parents to safely get their children to the school gate.

Introduction of thousands of vehicle trips per day into this vital corridor could prove deadly. Drivers rushing to the hospital with an emergency are not going to cautiously drive 15 mph

[1] https://www.healthychildren.org/English/safety-prevention/on-the-go/Pages/safety-on-the-way-to-school.aspx

through a school zone, being careful to make sure children don't pop out from behind parked cars. Ambulances trying to access the hospital site would regularly find the street completely blocked in both directions, delaying critical care to their patients. The EIR and traffic study must determine the effect this project would have on child safety and emergency response times. In addition to measuring traffic at AM and PM peak hours, Task 2 of the SOW must be expanded to measure and model traffic at school pick up times (1-1:45pm and 3-4pm) to determine whether this highly vehicle-centric project represents an incompatible use with the presence of a school full of vulnerable children.

Poor signal timing coordination on San Pablo Avenue between 47th Street and 53rd Street means that traffic backs up into the intersection at 53rd Street (see Exhibit H). The EIR must study applicant-funded traffic safety measures, including restructuring the dropoff area on 53rd Street and improvements on San Pablo Avenue to decrease blockages.

The block of 53rd Street between San Pablo Avenue and Boyer Street is not the only problematic stretch of road. As part of the project to improve Hollis Street, bus bump outs were installed to slow traffic and increase pedestrian safety. However, when AC Transit or Emery-Go-Round buses stop to pick up or drop off passengers, traffic backs up into the intersection of 53rd Street and Hollis Street (see exhibits I and J). Drivers unwilling to wait for the road to be clear drive in opposing lanes of traffic to bypass the bottlenecks (see Exhibit K). The EIR and associated traffic study must address the impact of bus dwell times and complete blockage of that key intersection on emergency vehicle access to the hospital.

The Hollis Street redesign also included marked parallel parking spaces between the bus pads on 53rd Street and 45th Street (see Exhibit L). Since the applicant will charge for their parking garage (which they've already admitted leaves them at a parking deficit), hospital visitors will naturally seek the free options in the area, creating more traffic gridlock and pollution from idling vehicles searching for parking.

This problem will also be felt down 53rd Street, where parking is largely unrestricted, and on Emery Bay Drive and Temescal Circle, which are private roads (see exhibits M through O). Unauthorized parkers will result in increased calls to Emeryville PD, who routinely instruct Emery Bay Village residents to immediately report suspicious or uninvited people. These two areas also happen to be adjacent to Anna Yates and ECDC, and are home to a significant number of seniors, meaning sensitive receptors will be exposed to elevated levels of particulates and other harmful substances from increased traffic. 53rd Street is also the lone entry and exit point for the 112 housing units in Emery Bay Village, so blockages trap residents in the neighborhood. The EIR should evaluate mitigations such as an applicant-funded Residential Parking Permit program and private security patrols in these areas.

Construction

Like much of Emeryville, this project site sits on a brownfield. While remediation has taken place, I am concerned that remediation did not reach the depths required by this project. A

330-foot tall hospital tower requires significantly deeper piles and foundations than the average building. The EIR must study the level to which soil at the project site might still be contaminated at the depths required for such a tall building. Additionally, the EIR must study the extent to which contaminants in the soil might shift from the project site to adjacent areas (especially nearby residential neighborhoods and protected wetlands) as a result of construction. Additionally, the EIR should evaluate using pre-drilled holes to minimize the impact of pile driving on potentially sensitive soil and on neighborhood noise.

Energy use

The applicant is proposing an all-electric hospital facility. While the goal of reducing fossil fuel use is commendable, a 785,000 square foot hospital cannot generate all of the electricity it needs on-site, especially given that the helipad precludes rooftop solar arrays. Per CEQA Appendix G Section V (Energy), the EIR must study the effects of an all-electric hospital of this magnitude on local power generation, transmission, and distribution.

Emergency response

A specialized facility of this scale requires specialized training and equipment for first responders. Emeryville's fire stations are not equipped to respond to emergencies at a 330-foot tall 785,000-square-foot hospital with a helipad. The City of Emeryville and Alameda County should not have to shoulder the cost to train our firefighters for such an unusual use case. Additionally, any major emergency at such a facility would require a significant mutual aid response from other local fire departments. Under CEQA Appendix G Section XV (Public Services), the EIR must study the staffing, equipment, and facilities upgrades required for Alameda County Fire Department to serve such a large specialty medical campus without degrading response times for other city emergencies.

No project alternative

As a reasonable project alternative, the EIR should study the impact of the applicant bringing the existing Alta Bates hospital facility into seismic compliance rather than abandoning it for a new facility in Emeryville. The applicant has not shared with the community why this site was selected or whether renovating Alta Bates was seriously considered, despite proclaiming the need to fill the hospital desert between Oakland and Richmond. Choosing a project site that is even closer to their Oakland hospital than Alta Bates calls into question the efficiency of building in Emeryville to close that gap.

Attachments:
Exhibits A through O

EXHIBIT A: 53rd Street / Anna Yates Elementary School Gridlock and Safety Concerns
Date Captured: March 24, 2026 3:03pm
Location: 1114 53rd St, facing east

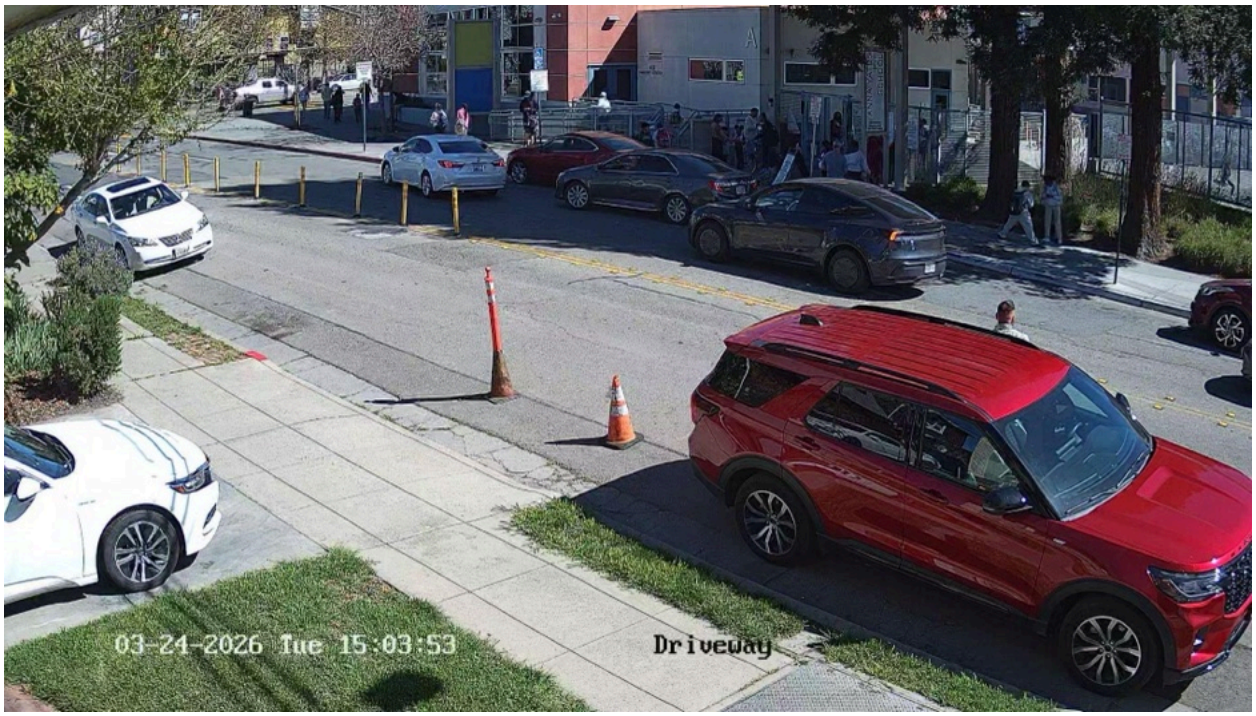


Photo used with express written permission from John Amador for scoping purposes only

Exhibit Description: The white sedan (top) is double parked, blocking both the traffic lane and a driver attempting to pull away from the curb. The white sedan is parked here for more than 3 minutes.

Legal Relevance under CEQA: The photograph and narrative above document the true baseline conditions of the 53rd Street residential and school corridor during peak operational hours. It demonstrates that current conditions at the school dropoff point are unsafe and promote driving illegally on the wrong side of the road. Under CEQA, this documentation constitutes substantial evidence of an existing structural constraint. The EIR is legally required to evaluate dedicated project alternatives—such as closing 53rd Street just east of Hollis Street to non-emergency vehicles and redesigning the school dropoff area—to permanently insulate this vulnerable student pedestrian zone from the projected 20,000 daily hospital vehicle trips.

EXHIBIT B: 53rd Street / Anna Yates Elementary School Gridlock and Safety Concerns
Date Captured: June 10, 2026 8:24am
Location: 53rd Street between Hollis Street and San Pablo Ave, facing west



Exhibit Description: Double-parked cars cause traffic to back up on 53rd Street beyond the Boyer Street intersection. This is a daily occurrence.

Legal Relevance under CEQA: The photograph and narrative above document the true baseline conditions of the 53rd Street residential and school corridor during peak operational hours. It demonstrates that current conditions at the school dropoff point are unsafe and promote driving illegally on the wrong side of the road. Under CEQA, this documentation constitutes substantial evidence of an existing structural constraint. The EIR is legally required to evaluate dedicated project alternatives—such as closing 53rd Street just east of Hollis Street to non-emergency

vehicles and redesigning the school dropoff area—to permanently insulate this vulnerable student pedestrian zone from the projected 20,000 daily hospital vehicle trips.

EXHIBIT C: 53rd Street / Anna Yates Elementary School Gridlock and Safety Concerns
Date Captured: June 8, 2026 8:27am
Location: 53rd Street between Hollis Street and San Pablo Ave, facing east



Exhibit Description: Two divers use the opposing traffic lane to bypass double-parked cars at the school dropoff point. Traffic backs up down the block. This is a daily occurrence.

Legal Relevance under CEQA: The photograph and narrative above document the true baseline conditions of the 53rd Street residential and school corridor during peak operational hours. It demonstrates that current conditions at the school dropoff point are unsafe and promote driving illegally on the wrong side of the road. Under CEQA, this documentation constitutes substantial evidence of an existing structural constraint. The EIR is legally required to evaluate dedicated

project alternatives—such as closing 53rd Street just east of Hollis Street to non-emergency vehicles and redesigning the school dropoff area—to permanently insulate this vulnerable student pedestrian zone from the projected 20,000 daily hospital vehicle trips.

EXHIBIT D: 53rd Street / Anna Yates Elementary School Gridlock and Safety Concerns
Date Captured: March 24, 2026 2:57pm
Location: 1114 53rd St, facing east



Photo used with express written permission from John Amador for scoping purposes only

Exhibit Description: A driver (black SUV) uses the opposing lanes of traffic to pass a double-parked car (black sedan). The driver is not in the sedan and left it parked in the traffic lane for 2 minutes.

Legal Relevance under CEQA: The photograph and narrative above document the true baseline conditions of the 53rd Street residential and school corridor during peak operational hours. It demonstrates that current conditions at the school dropoff point are unsafe and promote driving illegally on the wrong side of the road. Under CEQA, this documentation constitutes substantial evidence of an existing structural constraint. The EIR is legally required to evaluate dedicated project alternatives—such as closing 53rd Street just east of Hollis Street to non-emergency vehicles and redesigning the school dropoff area—to permanently insulate this vulnerable student pedestrian zone from the projected 20,000 daily hospital vehicle trips.

EXHIBIT E: 53rd Street / Anna Yates Elementary School Gridlock and Safety Concerns
Date Captured: April 27, 2026 8:26am
Location: 1114 53rd St, facing east



Photo used with express written permission from John Amador for scoping purposes only

Exhibit Description: A cyclist uses the opposing lane of traffic to avoid double-parked cars.

Legal Relevance under CEQA: The photograph and narrative above document the true baseline conditions of the 53rd Street residential and school corridor during peak operational hours. It demonstrates that current conditions at the school dropoff point are unsafe and promote driving illegally on the wrong side of the road. Under CEQA, this documentation constitutes substantial evidence of an existing structural constraint. The EIR is legally required to evaluate dedicated project alternatives—such as closing 53rd Street just east of Hollis Street to non-emergency vehicles and redesigning the school dropoff area—to permanently insulate this vulnerable student pedestrian zone from the projected 20,000 daily hospital vehicle trips.

EXHIBIT F: 53rd Street / Anna Yates Elementary School Gridlock and Safety Concerns
Date Captured: April 2, 2026 3:04pm
Location: 1114 53rd St, facing west

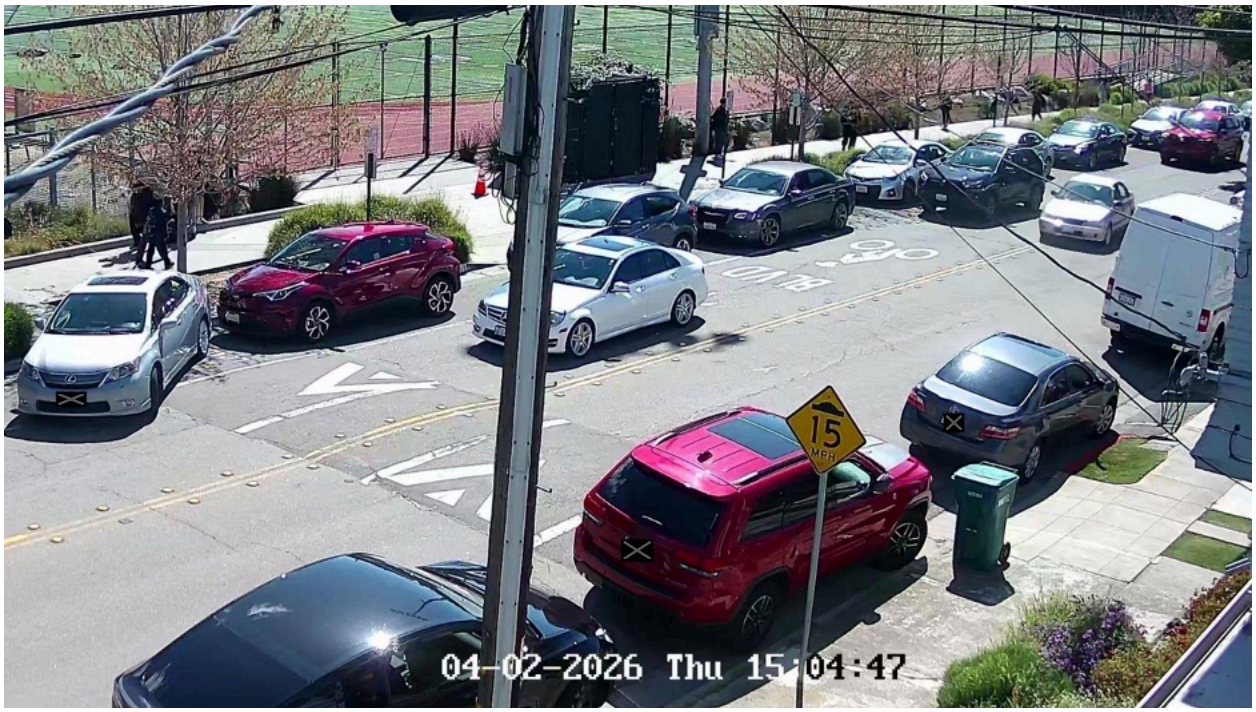


Photo used with express written permission from John Amador for scoping purposes only

Exhibit Description: The black SUV (top-right) is double-parked in the eastbound lane for more than 8 minutes. In this time, 12 cars use the opposing traffic lane to pass it.

Legal Relevance under CEQA: The photograph and narrative above document the true baseline conditions of the 53rd Street residential and school corridor during peak operational hours. It demonstrates that current conditions at the school dropoff point are unsafe and promote driving illegally on the wrong side of the road. Under CEQA, this documentation constitutes substantial evidence of an existing structural constraint. The EIR is legally required to evaluate dedicated project alternatives—such as closing 53rd Street just east of Hollis Street to non-emergency vehicles and redesigning the school dropoff area—to permanently insulate this vulnerable student pedestrian zone from the projected 20,000 daily hospital vehicle trips.

EXHIBIT G: 53rd Street / Anna Yates Elementary School Gridlock and Safety Concerns
Date Captured: March 24, 2026 3:05pm
Location: 1114 53rd St, facing west



Photo used with express written permission from John Amador for scoping purposes only

Exhibit Description: A driver (red SUV) makes an illegal three-point turn in the middle of the street. At right, an Amazon delivery van parks blocking the westbound lane.

Legal Relevance under CEQA: The photograph and narrative above document the true baseline conditions of the 53rd Street residential and school corridor during peak operational hours. It demonstrates that current conditions at the school dropoff point are unsafe and promote driving illegally on the wrong side of the road. Under CEQA, this documentation constitutes substantial evidence of an existing structural constraint. The EIR is legally required to evaluate dedicated project alternatives—such as closing 53rd Street just east of Hollis Street to non-emergency vehicles and redesigning the school dropoff area—to permanently insulate this vulnerable student pedestrian zone from the projected 20,000 daily hospital vehicle trips.

EXHIBIT H: 53rd Street / Anna Yates Elementary School Gridlock and Safety Concerns
Date Captured: June 10, 2026 8:32am
Location: San Pablo Ave. at 53rd St., facing west



Exhibit Description: Southbound traffic backs up into the intersection of 53rd St. and San Pablo Ave. due to poorly coordinated signal timing between this intersection and the intersection of 47th St./Steve Dain Dr. and San Pablo Ave.

Legal Relevance under CEQA: This photographic and observational evidence constitutes substantial evidence under CEQA Guidelines Section 15384, establishing a severe operational and safety hazard within the existing baseline infrastructure that the Lead Agency must directly analyze.

This disclosure directly triggers the mandatory analysis required under CEQA Appendix G, Section XVI (Transportation), Checklist Question (a), which evaluates whether a project will conflict with a program, plan, ordinance, or policy addressing the circulation system, and Question (c), which addresses substantial increases in hazards due to geometric design features or incompatible uses. San Pablo Avenue (State Route 123) is a major regional arterial under Caltrans jurisdiction, operating under predefined signal-timing programs. As documented,

the sub-optimal coordination between the 53rd Street and 47th Street signals creates an existing structural bottleneck where downstream queues regularly spill backward, paralyzing the upstream intersection grid.

The introduction of thousands of daily project-related vehicular trips will intersect dynamically with this failing baseline condition. Adding massive hospital traffic volumes to an uncoordinated arterial segment represents a direct intensification of an existing circulation hazard. When a project's traffic is injected into an intersection already suffering from queue spillback, it triggers localized gridlock, forces erratic lane-merging behavior, and blocks critical cross-traffic paths.

Crucially, this localized failure has severe secondary environmental implications under Section XVII (Tribal Cultural Resources / Public Services) and Section XVI. Because 53rd Street is an active corridor, blocking this intersection directly delays emergency vehicle response times (Fire/EMS) attempting to traverse San Pablo Avenue or access adjacent neighborhoods.

I request that Task 3 (VISSIM Operations Analysis) of the scope of work be expanded to perform continuous queue-length modeling along San Pablo Avenue between 45th and 54th Streets. I request explicit simulation of the uncoordinated signal spillback between 53rd and 47th Streets so that localized gridlock and emergency access delays are not masked by averaged Level of Service calculations. If significant impacts are found, the EIR must evaluate mandatory, applicant-funded structural remedies, including a binding requirement for the applicant to fund Caltrans Corridor System Management Plan (CSMP) upgrades, execute automated signal-timing optimization, or install adaptive, real-time vehicle-sensing loop detectors across both intersections to prevent gridlock spillback.

EXHIBIT I: Physical Incompatibility of Existing Traffic Calming on Access Corridors
Date Captured: June 8, 2026 9:00am
Location: SW corner of Hollis Street at 53rd Street, facing east



Exhibit Description: An Emery-Go-Round bus stops to take passengers at a newly constructed bus pad. Traffic backs up into the intersection. This happens multiple times per day at rush hour.

Legal Relevance under CEQA: This evidence documents that the local access infrastructure has been intentionally modified by the City to restrict rapid vehicle circulation in favor of multi-modal safety.[2] The EIR must explicitly evaluate how the addition of 1,500–1,800 peak-hour hospital vehicle trips can legally or physically reconcile with a roadway system that has been systematically narrowed to prevent high-volume vehicle flow. I request that Task 3A (VISSIM Model Calibration) explicitly incorporate bus dwell times at in-lane bus pads along Hollis Street.

[2] https://www.emeryville.org/Government/Departments/Public-Works/Sustainable-Streetscapes-Annual-Paving

EXHIBIT J: Physical Incompatibility of Existing Traffic Calming on Access Corridors
Date Captured: June 16, 2026 5:17pm
Location: Hollis Street at 53rd Street intersection, facing north



Exhibit Description: An AC Transit bus stops to alight passengers. Traffic backs up into the intersection. This happens multiple times per day at rush hour.

Legal Relevance under CEQA: This evidence documents that the local access infrastructure has been intentionally modified by the City to restrict rapid vehicle circulation in favor of multi-modal safety.[3] The EIR must explicitly evaluate how the addition of 1,500–1,800 peak-hour hospital vehicle trips can legally or physically reconcile with a roadway system that has been systematically narrowed to prevent high-volume vehicle flow.

The EIR must evaluate the physical safety hazards of hospital-generated traffic attempting opposing-lane bypasses around stopped AC Transit and Emery-Go-Round buses. I request that

[3]https://www.emeryville.org/Government/Departments/Public-Works/Sustainable-Streetscapes-Annual-Paving

Task 3A (VISSIM Model Calibration) explicitly incorporate bus dwell times at in-lane bus pads along Hollis Street.

EXHIBIT K: Physical Incompatibility of Existing Traffic Calming on Access Corridors
Date Captured: June 16, 2026 5:33pm
Location: Hollis Street at 53rd Street intersection, facing south



Exhibit Description: An Emery-Go-Round bus stops to take passengers at a newly constructed bus pad. Two drivers use opposing lanes to bypass the stopped bus, narrowly missing an oncoming vehicle. This happens multiple times per day at rush hour.

Legal Relevance under CEQA: This evidence documents that the local access infrastructure has been intentionally modified by the City to restrict rapid vehicle circulation in favor of multi-modal safety.[4] The EIR must explicitly evaluate how the addition of 1,500–1,800 peak-hour hospital vehicle trips can legally or physically reconcile with a roadway system that has been intentionally and systematically narrowed to prevent high-volume vehicle flow. I request that Task 3A (VISSIM Model Calibration) explicitly incorporate bus dwell times at in-lane bus pads along Hollis Street.

[4]https://www.emeryville.org/Government/Departments/Public-Works/Sustainable-Streetscapes-Annual-Paving

EXHIBIT L: Physical Incompatibility of Existing Traffic Calming on Access Corridors
Date Captured: June 29, 2026 10:30am
Location: Hollis St. south of 53rd St., facing south



Exhibit Description: Hollis St has unrestricted parallel parking spaces between 53rd St and 45th St. If the applicant implements paid parking, medical campus visitors will seek free parking on adjacent neighborhood roads. People attempting to parallel park will block the southbound one traffic lane, causing backups into the intersection at 53rd St.

Legal Relevance under CEQA: This photographic exhibit establishes substantial evidence under CEQA Guidelines Section 15384 regarding secondary parking displacement and vehicle-queuing hazards. Under CEQA Appendix G, Section XVI (Transportation), while parking deficits themselves are not always a standalone environmental impact, parking displacement that causes physical traffic hazards, lane blockages, or intersection gridlock must be fully analyzed and mitigated.

Hollis Street features unrestricted parallel parking spaces between 53rd Street and 45th Street. The introduction of paid parking at the applicant's 1,992-space parking structure will inevitably drive cost-sensitive medical campus visitors, contractors, and employees to seek free, unrestricted street parking on this adjacent residential/commercial corridor. Vehicles hunting for parking spaces and executing parallel parking maneuvers on a heavily constrained corridor will physically block the single southbound traffic lane, causing severe vehicle spillback and queuing directly into the high-volume intersection at 53rd Street. The EIR must include a Parking Displacement and Spillover Analysis that models how the hospital's parking pricing structures will physically alter circulation on Hollis Street and 53rd Street, and must evaluate structural mitigations, such as applicant-funded Residential Parking Permit (RPP) programs or physical lane reconfiguration.

EXHIBIT M: Unrestricted Parking Baselines and Neighborhood Security Vulnerabilities
Date Captured: June 8, 2026 8:52am
Location: Emery Bay Drive at 53rd Street (east entrance)



Exhibit Description: Emery Bay Village is a private common-interest development featuring open, unrestricted vehicular access. If the applicant implements paid garage parking, medical campus visitors and staff seeking free parking will flood these private loops, converting a residential HOA corridor into an unauthorized hospital overflow facility.

Legal Relevance under CEQA: This spatial documentation provides direct substantial evidence under CEQA Guidelines Section 15384 of an unmitigated physical Land Use Incompatibility (CEQA Appendix G, Section XI) between a regional commercial/institutional medical center and an established residential community. Pursuant to the *Emery Bay Village CC&Rs (Instrument No. 2002220120)*, these drive aisles are private Common Area parcels, not public municipal right-of-way.

The EIR cannot treat private residential roads as a functional relief valve for project parking deficits. To protect private property rights, the HOA may be forced to construct physical security infrastructure—such as automated access gates, perimeter fencing, guard booths, and security

lighting. Under CEQA Guidelines Section 15126.4, the lead agency is legally required to evaluate the secondary environmental impacts of these mandatory physical security modifications, including vehicle queuing spillback onto 53rd Street caused by cars waiting at private security gates; nighttime light pollution, spillover, and glare affecting adjacent residences from security lighting; and aesthetic degradation and physical construction impacts along the 53rd Street frontage. The EIR should explore mitigations including applicant-funded security improvements and private security patrols.

EXHIBIT N: Unrestricted Parking Baselines and Neighborhood Security Vulnerabilities
Date Captured: June 8, 2026 8:55am
Location: Emery Bay Drive at 53rd Street (west entrance)



Exhibit Description: The internal circulation loops of Emery Bay Village are private drive aisles that serve as designated Emergency Fire Lanes and access points for 112 residential units.

Legal Relevance under CEQA: This documentation establishes substantial evidence under CEQA Guidelines Section 15384 regarding severe Emergency Access Hazards (CEQA Appendix G, Section XVI(d)) and Public Services Impacts (Section XV).
The introduction of hospital-related spillover parking along these private loops will physically obstruct designated fire lanes and hammer turnaround radii for emergency response vehicles. In the event of a structural fire or medical emergency within Emery Bay Village, overflow parking will delay Alameda County Fire Department (ACFD) apparatus deployment.

Furthermore, high-frequency turnaround maneuvers by non-residential drivers will cause accelerated physical deterioration of private asphalt paving and concrete curbs engineered strictly for low-volume residential traffic. The Draft EIR must model fire truck turnaround sweeps (AutoTURN analysis) within Emery Bay Drive under baseline vs. spillover conditions and

mandate applicant-funded physical access controls or enforcement mechanisms to maintain unobstructed emergency clearance. It must also study the cost to the Emery Bay Village HOA of increased physical degradation of this private roadway infrastructure.

EXHIBIT O: Neighborhood Security Vulnerabilities
Date Captured: June 8, 2026 9:07am
Location: Emery Bay Drive



Exhibit Description: Emery Bay Village features open green spaces and direct, low-set rear entryways to ground-level residential units. These private residential structures directly border the proposed hospital transportation influence zone.

Legal Relevance under CEQA: This exhibit establishes direct substantial evidence under CEQA Guidelines Section 15384 establishing the immediate proximity of sensitive receptors—including senior citizens and young families—to project-generated operational disturbances.
Allowing hospital visitors to enter, park, and idle within these private residential enclaves introduces direct physical environmental impacts under CEQA Appendix G, Section III (Air Quality) and Section XIII (Noise):

1. Micro-Scale Air Contaminants: Idling vehicles searching for parking will emit toxic air contaminants, fine particulate matter, and diesel exhaust directly outside residential windows and fresh-air intake vents.

2. Operational Noise Intrusion: Late-night vehicle door slams, headlight glare, engine idling, and foot traffic along private residential walkways will exceed local ambient noise standards, disrupting sleep and peace for resident seniors.

The EIR must execute a discrete Health Risk Assessment (HRA) and localized noise impact simulation for the Emery Bay Village interior loops rather than relying on generalized regional baseline averages.

Outlook

Notice Of Preparation for the Sutter project (NOP) Comment

From Richard Rhinehart <rmccaver@gmail.com>
Date Fri 9/4/2026 9:01 AM
To Miroo Desai <mdesai@emeryville.org>; April Foran <april.foran@emeryville.org>

Hello:

My colleague Brian Donahue asks that I submit this comment regarding the Sutter project to you for consideration. Thank you.

Brian Donahue
4333 Holden Street
Emeryville, CA
sophbeau@yahoo.com

RE:
Request for Sutter NOP Comments-

Emeryville's General Plan requires three acres of new park per 1000 new residents and 0.25 acres of parkland per 1,000 new employees. The Sutter project will be adding many new employees and possibly new residents and therefore it must commit to provide the necessary acreage of new park land to offset their environmental impact as delineated by the General Plan. These numbers (3 acres for 1000 new residents and .25 acres per new employees) are also delineated in the American Planning Association's core dictates. Because it has been vetted by the premier planning group in the United States (the APA) and because it has been vetted by the people of the City of Emeryville this needs to be identified by an EIR. To not provide the required park land identified in the General Plan that will be associated with this project would be to create an unmitigated environmental impact; namely all the negative effects identified as being accrued to too many people in too small of a space that park land universally has shown to ameliorate and therefore mitigate.

Outlook

Emeryville Sutter Project Comment

From Richard Rhinehart <rmccaver@gmail.com>
Date Thu 8/27/2026 4:52 PM
To Miroo Desai <mdesai@emeryville.org>

Dear Ms. Desai:

I am reaching out to you on behalf of my colleague, Brian Donahue, who is unable to communicate with you directly. Please forward this comment to the appropriate party. Thank you for your kind assistance!

RE: NOP Comments for the Emeryville Sutter Project

Transportation Concerns

The preparations of documents associated with this project must acknowledge Emeryville's existing Alternative Transportation Plan (ATP) which defers to the National Association of City Transportation Officials (NACTO) guidelines vis a vis bike boulevards. Specifically, a bike boulevard is required to have no more than 3000 vehicle trips per day (VTD) on it. To the extent that this project pushes any bike boulevard vehicle traffic over the 3000 VTP threshold (including but not limited to the Horton Street Bike Boulevard), mitigation measures must comply with the ATP/ NACTO guidelines and guarantee a timely traffic calming program be implemented that takes the number down to less than 3000 VTD should initial design not be 100% effective.

Further, it must be explained specifically how the mitigations will work and the pathway to compliance shown (in the event of failure). Also, there must be provisions made to have the general public be a part of the policing of the mitigation monitoring plan owing to the fact that the City of Emeryville has not traditionally placed safe biking at the center of it's transportation planning (City Hall proclamations to the contrary notwithstanding). It is taken as a given that any mitigation monitoring program should be rigorous enough to withstand public scrutiny. The process should allow for ANY member of the public (even unpopular people) to register complaints/ make inquiries about the VTP threshold. By "allow" I mean complaints and inquiries received need to be taken seriously and investigated in good faith. A program to assure this must be shown.

Lastly, Holden Street must be included as a study corridor. Already, before the Sutter project completion, Holden Street is used as a cut through path by vehicles hoping to beat traffic on Horton and Hollis streets. Because this problem will only be exacerbated by the Sutter generated traffic, Holden Street must be included in the study.

Brian Donahue
4333 Holden Street
Emeryville, CA
94608
sophbeau@yahoo.com

(510) 717-1281

Outlook

Sutter opposition

From carol silverman <carol.janet.s@gmail.com>
Date Mon 9/14/2026 5:01 PM
To Miroo Desai <mdesai@emeryville.org>

I write in strong opposition to the Sutter proposal as it now stands.

Yes the immediate east bay needs a hospital - but the siting makes little sense and it is unclear to me what benefits Emeryville gets from the hospital, save perhaps some small business commerce.

The final straw for me was the fact that they have no interest in providing any community benefits. I cannot speak to the environmental impact, although what I have read from people more learned than I argues that the impact would be severe given contamination of the site along with the extra traffic.

However, the transportation system simply cannot accommodate this - a problem that will get even more severe when a lane is removed from San Pablo. The site is not directly on major arteries or transportation links. It would seem that locating near the west oakland bart (or any bart) would make more sense.

Carol Silverman
1271 62nd Street
Emeryville

Cathy Leonard
845 - 58th Street
Oakland, CA 94608-1403
(510) 927-1574

September 14, 2026

VIA EMAIL *mdesai@emeryville.org*

Miroo Desai, Planning Manager
Planning Division
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

RE: Notice of Proposal Response: Sutter Health's Proposal to Build Regional Hospital

Dear Ms. Desai,

I am writing on behalf of myself and my family and submitting this formal response to the Notice of Preparation (NOP) for the project's Environmental Impact Report (EIR) and non-CEQA transportation analysis.

I am Board Chair of the Golden Gate Community Association *Golden Gate Community Association*. I am also a member of Emeryville Neighbors United, a group of Emeryville and Oakland residents who formed in response to Sutter Health's medical campus proposal.

I am a lifelong Oakland resident and live in the Santa Fe neighborhood *Santa Fe, Oakland, California - Wikipedia*. My family has owned three properties in the Santa Fe neighborhood since the mid 1950s and we believe our lives will be adversely impacted by construction trucks travelling to and from the Sutter site and increased traffic of 20,000 daily vehicle trips a day. Our neighborhood is already impacted by overhead BART tracks and maximum level vehicle trips along Martin Luther King Jr. Way. Our properties are located immediately west of Martin Luther King Jr. Way.

1) TRANSPORTATION: TRAFFIC CORRIDORS

The Draft EIR must evaluate the potential for Sutter Health-related ambulance, employee, patient, visitor, rideshare, delivery, and construction traffic to adversely affect traffic volumes, traffic flow, and the frequency of bottlenecks within the traffic corridors listed below. The Draft EIR should also evaluate the traffic-related secondary environmental impacts, including higher vehicle emissions, increased noise levels,

vehicle to vehicle conflicts, pedestrian and bicyclist conflicts, traffic safety hazards, constraints on emergency access, and cumulative impacts when combined with other development and transportation projects in the area.

Given the geographic and physical constraints of this small residential Oakland corridor, the introduction of an estimated 20,000 hospital-related vehicle trips per day onto a roadway that can become gridlocked by a single stopped truck presents a severe and foreseeable operational hazard. The EIR cannot rely solely on generalized, macro-level traffic models that assume continuous and uninterrupted vehicle flow. Instead, the analysis should include a granular corridor blockage simulation to evaluate how the routine, day-to-day street obstructions on 53rd Street described below would interact with hospital-related traffic and affect corridor operations.

- The Santa Fe Neighborhood: Martin Luther King Jr. Way - 52nd to the Berkeley border (13 blocks)

  Martin Luther King Jr. Way (MLK Jr. Way) functions as a primary North-South arterial connecting South Berkeley to North Oakland and acts as a direct feeder to State Route 24 at the southern border. UCSF Benioff Children's Hospital's 11-acre hospital is right across the BART tracks along 52nd Street and along MLK Jr. Way. There are also existing traffic impacts from Highway 580/980.

  - MLK Jr. Way Paving Plan. A road diet is planned for December 2026 from 52nd Street to the Berkeley border at Stanford along MLK Jr. Way. Traffic lanes will be reduced from 3 lanes of traffic in each direction to 2 lanes. *Martin Luther King Jr Way Complete Streets Paving Project | City of Oakland, CA*

    According to Fehr & Peers' 2002 traffic analyses, "The street (MLK Jr. Way) would have capacity for future traffic growth—up to 3000 new daily vehicles — before reaching maximum capacity. Peak hour volumes on the corridor currently exceed the street's capacity during AM and PM peak hours, causing back-ups near the CA-24 highway ramps. Some queue lengths will increase during the peak hour with a 4-lane design of MLK, some queue lengths at red lights will increase during peak hours at the intersections of 52nd Street, 53rd Street, and 55th Street, but these queues are (sic) already exceed their capacity during peak hour on MLK Jr Way today."

    (*Note: the analysis fails to include 59th Street and the Stanford/Adeline which are controlled intersections with traffic currently stacking*). *Fehr & Peers' 2002 traffic analyses mlk-jr-way_road-diet-memorandum_final.pdf*

In 2022, this MLK Jr. Way served 10,000 - 15,00 vehicles a day and the average daily traffic on MLK from the northern border (52nd Street) to the southern border was 27,256 vehicles. The numbers have only increased since that time. There were 65 collisions in the past five years (2017-2021), and vulnerable road users were most affected. *Fehr & Peers' 2002 traffic analyses*. The influx of more drivers through the MLK exchange has seen an increase in vehicular accidents as evidenced

The analysis provided by Fehr & Peers' accounts for up to 3,000 new daily vehicles "before reaching maximum capacity." The addition of Sutter Health's projection of 20,000 new daily vehicles would far exceed the maximum capacity for MLK Jr. Way.

The EIR cannot rely solely on generalized, macro-level traffic models that assume continuous and uninterrupted vehicle flow. Instead, the analysis should include a granular corridor blockage simulation to evaluate how the routine, day-to-day street traffic along MLK Jr. Way from 52nd Street to the Berkeley border would interact with hospital-related traffic and affect corridor operations. The analysis should also include 52nd Street, 53rd Street, 55th Street, and the MLK/Stanford/Adeline corridor. With the exception of MLK Jr. Way, all of the above noted streets are narrow.



MLK Paving Project Map



Santa Fe neighborhood with Children's Hospital in the background. View of MLK Jr Way at 52nd Street.



Traffic on MLK Jr. Way heading south to 52nd Street.



52nd Street looking west towards the Santa Fe neighborhood. Westward traffic leaving from the direction of State Route 24 (52nd Street exit). Overheard BART track at MLK Jr. Way.



Santa Fe neighborhood. Looking west from MLK Jr. Way down narrow 53rd Street.



View along MLK Jr. Way (traffic heading south) looking west down 55th Street intersection, the site of many accidents.



On MLK Jr. Way at 55th Street looking north towards the Berkeley border. This controlled intersection is the site of many accidents.



Intersection of MLK Jr Way, Stanford, and Adeline. Intersection marks the City of Berkeley border.

Legal Relevance under CEQA:

The EIR must analyze how the project's substantial trip generation interacts with the Martin Luther King Jr. Way corridor from 52nd Street to the Stanford/Adeline border under:

- Transportation CEQA Appendix G, Section XVI, (a) to (f)
- Air Quality CEQA Appendix G, Section I (b) and (c)
- Greenhouse Gas Emissions CEQA Appendix G, Section VII (a) and (b)
- Hazards and Hazardous Materials CEQA Appendix G, Section VIII (a) and (b)
- Noise CEQA Appendix G, Section XII (a) and (b)
- Public Services Response Times CEQA Appendix G, Section XIV (a)

- Temescal Neighborhood along Telegraph Avenue

  State Route 4 is an east-west state highway in Oakland. The entrance and exits are on Telegraph Avenue at 56th (entrance) and 57th Street (exit). This freeway sees vehicular traffic east and west from 55th and 56th Streets. 57th Street is blocked from traffic travelling west this steers more traffic onto 55th Street at Telegraph. This corridor is particularly busy. An additional 20,000 new daily vehicles from Sutter Health would greatly impact all of these narrow streets.

- 

  Entrance to State Route 4 on Telegraph at 56th Street. The exit from State Route 4 is one block to the left.



State Route 4 exiting west at Telegraph and 57th Street. 57th Street does not have through traffic, sending vehicles left to 55th Street.



Looking west on 55th Street at Telegraph. Traffic would be coming from the right after exiting State Route 4.



Traffic exiting State Route 4 in the Temescal neighborhood on 52nd Street just west of Shattuck Avenue. Traffic exiting to go to Sutter Health would turn left on Shattuck a few hundred feet and then turn west on 55th Street into the Bushrod and Santa Fe neighborhoods.

Legal Relevance under CEQA:

The EIR must analyze how the project's substantial trip generation interacts with access and use of the Telegraph Avenue Corridor from 52nd Street to 57th Street under:

- Transportation CEQA Appendix G, Section XVI, (a) to (f)
- Air Quality CEQA Appendix G, Section I (a) (b), (c), (d), (e)
- Greenhouse Gas Emissions CEQA Appendix G, Section VII (a) and (b)
- Noise CEQA Appendix G, Section XII (a) and (b)
- Public Services Response Times CEQA Appendix G, Section XIV (a)

2) AIR QUALITY

Oakland residents in Temescal, Bushrod, and Santa Fe neighborhoods, particularly along Telegraph and Shattuck Avenues, MLK Jr. Way from 52nd Street to the Berkeley border, west on 52nd, 53rd, and 55th Streets and Stanford, will be the most affected by pollution related to on-site construction activities as well as truck traffic, worker trips, equipment exhaust, roadway congestion, idling, and associated particulate matter.

The EIR must analyze whether heavy construction planned for 6+ years at the project site will:

• Violate applicable air-quality standards
• Result in a cumulatively considerable net increase of criteria pollutants
• Expose sensitive receptors to substantial pollutant concentrations
• Create other localized air-quality effects associated with increased vehicle activity
Legal Relevance under CEQA:
The EIR must analyze the project's substantial construction activities under:
• Air Quality CEQA Appendix G, Section I, (a) (b), (c), (d), (e).

3) NOISE & VIBRATIONS

Oakland residents throughout Santa Fe, particularly along the MLK Jr. Way corridor, will be exposed to more than six years of excessive project-related construction noise from huge trucks travelling from the freeways and highways and possibly depositing dust and other by-products. These noise sources can adversely affect the nervous system, cardiovascular health, sleep quality, and cognitive performance. The Santa Fe and Bushrod neighborhoods are already affected by overhead BART tracks separating our neighborhoods.

The EIR scope should evaluate the anticipated noise and vibration levels and assess how they would:

• Violate applicable noise standards.
• Result in a cumulatively considerable increase in noise and vibration pollution.
• Extend along construction truck routes, affecting sensitive receptors and other residents who
live, work, or spend time along those routes.
• Create other localized noise impacts associated with project-related construction activities.
Legal Relevance under CEQA:
The EIR must analyze how the project's construction activities impact under:
• NOISE CEQA Appendix G, Section XII (a) (b), (c), (d), (e), (f)

Sincerely,

Cathy Leonard, Santa Fe resident

Dear Planning Commissioners,

I'm a resident at Emery Bay Village on 53rd Street, the residential complex directly adjacent to Emeryville's 3 schools and located 1 block over from the proposed Sutter site. Together, Emery Bay Village residents and students from the 3 schools number more than 800 people – constituting the largest, most directly impacted group of Emeryville stakeholders within a block of the proposed Sutter site – during construction and beyond.

53rd Street may be one of the most consequential corridors for the City and for Sutter in terms of safe passage to school for students. Just one block east of the proposed Sutter site, 53rd Street between Hollis and San Pablo threads through Emery Bay Village (one of Emeryville's first condo developments), Spur Alley (which includes a youth gymnastics center), Emeryville Child Development Center (which includes an outdoor playground for preschoolers), Anna Yates TK-8, and Emery High School. With 3 schools all packed in between Hollis and San Pablo, 53rd Street contains the highest concentration of students in Emeryville within a block.

I hope everyone – planning commissioners, council members, the City, Sutter – will agree that safe passage for school children is a non-negotiable condition, along with zero-disruption on the playground and in the classroom. Any project approval should be conditioned upon the project alternative, mitigation or site plan that produces zero or least adverse impacts to students along 53rd Street between Hollis and San Pablo. With the Sutter site to introduce near the schools over 20,000 daily trips and an influx of foot traffic of over 12,000 people – which is double the population of Emeryville – such non-negotiable conditions are more important than ever.

I'm not (yet) versed in the finer points of CEQA/EIR, so the considerations below are my best attempts at flagging what I think are essential to ensuring safe routes to school and zero disruption to the playground and classroom — but I likely don't know everything that should be studied.

1. Prohibit construction trucks from the school corridor (53rd Street between Hollis and San Pablo).
2. Prohibit shuttle buses from the school corridor (53rd Street between Hollis and San Pablo).
3. Prohibit ambulance routes from the school corridor (53rd Street between Hollis and San Pablo), and from Hollis between 45th and 53rd more broadly.
4. Evaluate alternative shuttle depot locations to replace the current proposal at Hollis Green Park on 53rd Street, to reduce added traffic on 53rd Street and Hollis — both key connecting paths for students, and Hollis is also a primary route for Emery-Go-Round and AC Transit buses.
5. Expand the transportation analysis to include an official student pedestrian study mapping common walking routes to/from schools.

If the Planning Commission shares this interest in protecting student safety, I'd welcome your help directing staff resources and asking the right questions to ensure the EIR studies the full range of impacts to student safety along this corridor — including any additional alternatives or mitigations that may not be evident to a non-expert:

- What are all the potential CEQA-relevant impacts to students — in public/pedestrian safety (due to increased traffic and the shuttle depot), noise (construction, ambulances, helicopter, etc.), and health (air quality, dust, construction impacts, etc.)? Does the project's current scope address these, or are there potential blind spots?
- Which site plan, alternatives, or mitigation measures best protect the interests of students? Project approval should hinge on the version that produces zero or the least impact to students.
- Traffic congestion is no longer considered a significant impact under CEQA as of 2020, with the passage of SB 743. Given how considerable public concern is around this issue, what metrics will the EIR and City use instead to evaluate traffic impacts for mitigation purposes and for the terms of any community benefits agreement.

Key school corridor observations: Sharing some on-the-ground observations that were shared with me during an informal 15-minute discussion with the traffic personnel regularly stationed outside the school during peak hours. Key takeaways:

- By foot: Students begin arriving on foot around 8:00 a.m. from multiple directions all over the city, including: The Emery apartments on Hubbard Street, apartments near 65th Street, apartments on Christie, from San Pablo corridor.
- By bus: Students arrive by Emery Go Round (53rd & Hollis).
- 53rd Street key walking route for students: Many will walk through 53rd Street on the sidewalk adjacent to Emery Bay Village as part of their route to/from school.
- After school: After 3:00 p.m. bell, many students remain in the area for after-school programs.
- San Pablo Avenue challenges: 4 way; vehicles back up at the San Pablo light (runs on a different signal schedule in AM).
- Oakland jurisdiction: Parts of 53rd near school fall within Oakland's jurisdiction; may limit enforcement of certain citations.

Planning approvals: Designate entire 53rd Street school corridor radius as Pedestrian Priority Zone:

- Every school day, students from 3 schools converge on one block to get to school, but 53rd Street is not yet a pedestrian priority zone in the General Plan (Figure 5-3; see next page). Currently, there's an interesting gap. While the school section itself is zoned as pedestrian priority, the street that most students use to get to school is not.
- When addressing project consistency in future reviews, City to evaluate amending the General Plan to apply Pedestrian Priority Zone designation to the entire 53rd Street between Hollis & San Pablo radius. Between Hollis & San Pablo, 53rd Street connects through Emery Bay Village multi-family housing, Spur Alley (including a youth gymnastics center), a preschool, an elementary school, a middle school, and a high school.

Thank you,
C. Zheng
Emery Bay Village

ABOUT EMERY BAY VILLAGE (EBV)

Residential complex on 53rd Street (between Hollis & San Pablo) located 1 block east of proposed Sutter Health project

- Residential complex of 100+ condos across 40+ buildings.
- **One of the city's largest tree canopies:** Emery Bay Village is home to one of the largest tree canopies in the city and a natural habitat to birds & wildlife. ***(Action: EIR request)***
- Between Hollis & San Pablo, 53rd Street runs through Emery Bay Village, Spur Alley (incl youth gymnastics center), and multiple schools (Emeryville Child Development Center, Anna Yates K-8, Emery High School). ***(Action: General Plan amendment request)***

KEY SCHOOL CORRIDOR OBSERVATIONS (TRAFFIC OFFICER)

On-the-ground observations were shared with me during an informal 15-minute discussion with the traffic officer regularly stationed outside the school during peak hours. Personal key takeaways (some may have EIR or Sutter planning impacts):

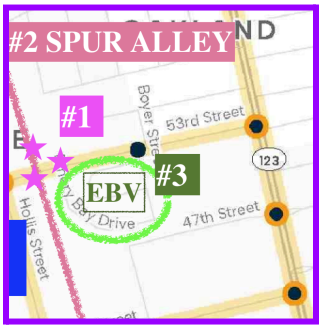
- **By foot:** Students begin arriving on foot around 8:00 a.m. from multiple directions all over the city, including: *The Emery* apartments on *Hubbard Street*, apartments near *65th Street*, apartments on *Christie*, from *San Pablo corridor*.
- **By bus:** Students arrive by Emery Go Round (53rd & Hollis).
- **53rd Street key walking route for students:** Many will walk through 53rd Street on the sidewalk adjacent to Emery Bay Village as part of their route to/from school.
- **After school:** After 3:00 p.m. bell, many students remain in the area for after-school programs.
- **San Pablo Avenue challenges:** 4 way; vehicles back up at the San Pablo light (runs on a different signal schedule in AM).
- **Oakland jurisdiction:** Parts of 53rd near school fall within Oakland's jurisdiction; may limit enforcement of certain citations.

CITY GENERAL PLAN

Figure 5-3: Current Designated Pedestrian Priority Zones



CEQA & CITY REQUESTS



1. **Expand traffic study beyond current scope's preliminary set of 79 study locations.** Add ≥ 3 overlooked access points along 53rd Street impacting Emery Bay Village, Spur Alley, and the school sites.
2. **Expand traffic study (Spur Alley corridor):** Spur Alley does not appear to be reflected in EIR scope of work. Spur Alley, located next to Emery Bay Village, is likely the closest side street to Hollis and Sutter Health. Spur Alley stretches over multiple blocks from 45th Street to Stanford, across multiple businesses, including a kid's gymnasium center.
3. **Ecological impact study (Emery Bay Village):** Require ecological impact study to be conducted for Emery Bay Village (e.g. impacts to tree canopy and wildlife habitat resulting from potential construction, air quality, acoustic impacts e.g. ambulances).
4. **Student pedestrian impact:** Expand the transportation analysis to include official student pedestrian study that maps common walking routes to/from schools, and evaluates project-related impacts.
5. **Zoning designation for 53rd Street radius:** Amend General Plan to apply Pedestrian Priority Zone designation to entire 53rd Street between Hollis & San Pablo radius. Between Hollis & San Pablo, 53rd Street connects through Emery Bay Village multi-family housing, Spur Alley (including a youth gymnastics center), a preschool, an elementary school, a middle school, and a high school. ***(see public comment annotation in red; Figure 5-3 of City's General Plan)***

KEY PRIORITY: SAFE ROUTES TO SCHOOL TO EMERYVILLE

City to explore conditioning project approval with the expansion of **a maximal and permanent Safe Routes to School Program & Operation fully funded by the developer**. A Safe Routes to School Operation is ever more important in the years ahead. A number of community benefit improvements can fall under this program (infrastructure, personnel, funding). **One starting point:** Fund for Safe Routes to School staffing in Emeryville. This job has been a gap, as reported by City's Active Transportation Plan annual progress report.

Daniela Mavrici, Ph.D.

5831 Marshall St.

Oakland, CA 94608

Email: dmavrici@gmail.com

September 14, 2026

To: Miroo Desai, AICP

Planning Manager, City of Emeryville

1333 Park Avenue

Emeryville, CA 94608

mdesai@emeryville.org

SUBJECT: Scoping Comments on the Environmental Impact Report (EIR) – Sutter Emeryville Medical Center Project (Traffic, Pedestrian Safety, and Helipad Operations)

Dear Ms. Desai,

My name is Daniela Mavrici, and I am writing as a long-time resident of 5831 Marshall Street (at the intersection with Stanford Avenue), where I have lived since 2013. As a parent of two young children (ages 7 and 12), I am submitting these formal scoping comments regarding the Environmental Impact Report (EIR) and associated non-CEQA transportation analysis for the proposed Sutter Emeryville Medical Center Project.

Our family is deeply concerned about the potential for significant increases in vehicular traffic, pedestrian hazards, and acoustic impacts on our immediate residential neighborhood. Specifically, we request that the EIR comprehensively evaluate two critical areas of concern: **vehicular cut-through traffic** and **proposed helicopter/helipad operations**.

1. Vehicular Traffic, Cut-Through Control, and Pedestrian Safety

Marshall Street is currently a quiet residential street. However, given its position just west of San Pablo Avenue, there is a high risk that drivers seeking to bypass main artery congestion will use Marshall Street and Stanford Avenue as shortcuts.

This shift from a residential neighborhood street to a high-volume cut-through corridor directly threatens our quality of life and compromises the safety of local children who regularly walk and bike in the area. We request that the EIR address:

- **Cut-Through Traffic Mitigation:** Analyze projected traffic diversion onto residential side streets, specifically Marshall Street north of Stanford Avenue, resulting from project-generated congestion on San Pablo Avenue.
- **Local Access & Traffic Calming:** Evaluate traffic-calming measures and local-access-only restrictions (e.g., turn restrictions or traffic-diverting infrastructure) along Marshall Street, north of Stanford Avenue, to prevent cut-through vehicles.
- **Pedestrian & Bicycle Safety:** Assess potential conflicts between project-related traffic and active transportation routes used by children along Stanford Avenue and Marshall Street.

2. Helipad Operations: Noise, Flight Paths, and Safety Impacts

We understand that the project scope may include an emergency helipad. Because helicopter landings and takeoffs generate severe low-frequency noise, vibration, and safety considerations, the EIR must rigorously analyze the direct, indirect, and cumulative impacts of flight operations on nearby homes.

Specifically, we request that the EIR evaluate the following under CEQA:

- **Acoustic & Vibration Impacts:** Conduct a comprehensive noise study mapping CNEL/Ldn noise contours for emergency helicopter approaches and departures, specifically evaluating ambient noise increases, nighttime disruption, and low-frequency vibration at residential structures along Marshall Street and Stanford Avenue.
- **Flight Path & Approach Corridors:** Analyze designated approach and departure corridors to ensure flight paths avoid low-altitude transit directly over residential blocks and local schools/parks.
- **Safety & Hazard Assessment:** Evaluate safety risks associated with emergency medical flights in high-density urban settings, including emergency landing contingencies and downwash turbulence effects on nearby streets and pedestrians.
- **Operational Limits & Mitigation:** Study feasibility of operational constraints, such as limiting non-emergency transport flights, establishing strict glide-slope parameters, and incorporating noise-barrier architecture on the landing structure.

Thank you for considering these critical community concerns during the scoping process. Please include this letter in the official public record for the Sutter Emeryville Medical Center EIR.

Sincerely,

Daniela Mavrici, Ph.D.

5831 Marshall St., Oakland, CA 94608

dmavrici@gmail.com

Outlook

major traffic problems related to Sutter planned campus in Emeryville

From devaki merrill merrill <devakimerrill@gmail.com>
Date Sun 9/13/2026 3:26 PM
To Miroo Desai <mdesai@emeryville.org>

Hello.Miroo,

I live on Fremont St. near 59th St. The other end of my block is at Powell St./StanfordAve., which I experience as one entiity as they are only 35 feet apart at this point and become one street when Powell becomes Stanford about 40 feet east. The corner of Fremont and Powell is Extremely dangerous for every form of movement trying to enter or cross the intersection (bikes, automobiles, pedestrians (both adults and children), as it is IMPOSSIBLE to see oncoming traffic from the next MAJOR intersection with San Pablo Ave., 1 1/2 blocks east and at a curve which prevents visibility of oncoming traffic.
This is a major problem for the neighborhood already, which has an abundance of senior citizens who often find it very hard to race ahead of oncoming traffic they missed seeing.

Fremont St. and other local streets, both N/S and E/W, have historically been (and still are) used as overflow street parking for businesses along Hollis St., of which there are many. This is mostly a daytime problem currently, although with visitors to hospital patients it could become a nightmare. Most of these houses are occupied by couples who have 2 cars but whose driveways are one-car wide, so it's a shuffle for them and they usually park one of their cars on the street. On Oakland's Clean the Street days parking already gets tough, and will become drastically worse with hundreds (thousands?) of more cars vying for space.

Then of course there is the issue of increased air and noise pollution for those of us, Emeryville and Oakland residents, who are currently happily living nearby. The 8-80 freeway traffic already wakes me up at night! Has there been an EIR study of air and noise changes expected with the additional traffic on city streets?

Many thanks for looking into these comments and figuring out how to mitigate them. Please update me about any planned mitigations.

And a question for which you may not have an answer: Why is Emeryville accepting this project when it will leave the town in worse financial shape than it is currently in? Or is it out of Emeryville's hands already?

Sincerely yours,

Judy Merrill
5853 Fremont St.
Oakland 94608

Planning Division
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

RE: Public Scoping Comments and Environmental Requests for Sutter Hospital Medical Center (PUD25-001)

To the Emeryville Planning Division, Planning Commission, and City Council:

We are writing to express our concerns about the impacts of the Sutter Emeryville Medical Center on adjacent North Oakland neighborhoods. Our roads have been used as cut-throughs from points east to Emeryville for the nearly four decades we have lived here (and we are sure longer). We are very skeptical that current traffic projections for this project accurately reflect the realities of our streets. This document serves as a formal scoping request for the project's Environmental Impact Report and for the project's non-CEQA transportation analysis.

1) **Traffic Volumes in Golden Gate Neighborhood**

During the Planning Commission meeting on June 25, the applicant's traffic consultant stated "the feasibility traffic study considered about 5% of the total project traffic using 53rd St. to the east of Hollis; the analysis assumes that most of the traffic would use Hollis from Powell or from 40th St. to Hollis or Horton St."[1] As 37-year residents of 54th and Gaskill in North Oakland, we do not think the 5% estimate is realistic.

The Golden Gate neighborhood is already used as a cut-through from CA-24 to points west, including the entire city of Emeryville. The intersections of Martin Luther King Jr. Way (MLK) at 52nd, 53rd, and 55th streets are already under particular strain given the expansion of the UCSF Benioff Children's Hospital. We fear that adding even 5% of the projected 20,000 daily vehicle trips (which, again, we find unrealistic given decades of lived experience, and given that the City of Oakland is currently bidding out a construction contract for narrowing MLK) would create a traffic environment that is neither safe nor beneficial for any of its users.

In fact, with respect to the Martin Luther King Jr. Way Complete Streets Paving Project, OakDOT asserts the following based on analysis by Fehr & Peers, the traffic consultant retained by Urban Planning Partners (UPP) for this project:

"*Peak hour volumes on the corridor currently exceed the street's capacity during AM and PM peak hours, causing back-ups near the CA-24 highway ramps. Some queue lengths will increase during the peak hour with a 4-lane design of MLK, some queue lengths at red lights will*

[1] https://www.youtube.com/live/J5hT26BStW0?si=TTlRuVh9iymlRsbu&t=6482

increase during peak hours at the intersections of 52nd Street, 53rd Street, and 55th Street, but these queues are already exceed (sic) their capacity during peak hour on MLK Jr. Way today."[2]

Apparently UPP's traffic consultant thinks that because the intersections already exceed capacity, it's no big deal to add additional cars. We respectfully disagree.

2) **Confusing, non-standard street grid alignments on narrow local roads**

The Golden Gate and Longfellow neighborhoods have a number of difficult intersections that confuse even local residents. There are multiple multi-leg asymmetric intersections and skewed angled intersections (shown in Exhibits A and B) because Adeline St. cuts diagonally across the standard street grid. This creates complex, overlapping turning tracks and highly unconventional conflict points for vehicles, cyclists, and pedestrians. The intersection of 53rd St, Lowell St., and Adeline St., (shown in Exhibit A) is particularly chaotic, causing traffic traveling west on 53rd St. (toward the proposed hospital) to stop at Adeline St., make a right turn, then immediately make a left turn through the intersection of Adeline St., Lowell St., and 53rd St. (an intersection that is uncontrolled when traveling westbound). While westbound traffic on 53rd St. stops only once at this confusing intersection, 53rd St. traffic traveling east, north, or south from Lowell St. have to make two stops, then navigate free-flowing traffic on Adeline St. to continue their journey. This problematic intersection is made worse by the fact that delivery trucks, food delivery drivers, and dumpsters routinely occupy the bike lane, completely obliterating sight lines (shown in Exhibit F).

The streets in the Golden Gate neighborhood are barely wide enough to accommodate current traffic flows. In particular, 53rd St. between Gaskill St. and San Pablo Ave. frequently sees conflicts between eastbound and westbound vehicles. When large vehicles stop, free-flowing two-way passage is impossible (shown in Exhibit C). Current conditions create a physical bottleneck that would significantly impact emergency vehicle response times between North Oakland and the hospital site. 47th St. used to be an additional traffic relief valve for cars traveling from points east, but the City of Emeryville decided to install a traffic diverter that prohibits through traffic to cross San Pablo Ave. (shown in Exhibit D). As a result, the only through street (meaning a street where traffic has to pass through only one intersection to cross San Pablo Ave.) between Stanford Ave. and 40th St. is 53rd St. It can barely handle current traffic levels. It certainly cannot handle additional hospital traffic.

3) **Exposure of vulnerable populations to hospital cut-through traffic**

This project must seriously study if these roads can realistically accommodate additional traffic, especially from such a large-scale project.

Modern consumer navigation and mapping technologies provide drivers with real-time updates to get them to their destination as quickly as possible. If a particular block of 53rd St., Stanford Ave., or 40th St. is congested, dynamic mapping and routing apps will direct traffic to other parts

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[2] https://www.oaklandca.gov/files/assets/city/v/1/transportation/documents/projects/mlk-jr-way/complete-streets-paving-project/mlk-jr-way_road-diet-memorandum_final.pdf

of our neighborhood to bypass it. This will force traffic onto other local streets that serve as primary paths to our senior center, our language immersion schools, our library, various daycares, fitness gyms, and local parks (shown in Exhibit E). Significant hospital traffic is not compatible with the very pedestrian nature of many of these neighborhood institutions.

Because of this significant cut-through traffic issue, we formally request that the Draft EIR and traffic analysis perform the same analysis on the following Oakland intersections (as outlined in Tasks 2 and 3 in the scope of work) as it does for the 79 specified Emeryville intersections:

- 53rd St. @ San Pablo Ave. (offset T-intersection)
- 53rd St. @ 48th St. (skewed intersection)
- 53rd St. @ Gaskill St. (skewed intersection)
- 53rd St. @ Lowell St. & Adeline St. (multi-leg asymmetric intersection)
- 53rd St. @ Market St.
- 53rd St. @ Genoa St.
- 53rd St. @ Martin Luther King Jr., Way
- 54th St. @ San Pablo Ave. (offset, non-through intersection; traffic cannot continuously flow on 54th St. across San Pablo Ave.)
- 54th St. @ Gaskill St.
- 54th St. @ Lowell St.
- 54th St. @ Adeline St. (offset skewed intersection)
- 54th St. @ Market St.
- 54th St. @ Genoa St.
- 54th St. @ Martin Luther King Jr., Way

4) Pavement conditions and impact to OakDOT expenditures

The Draft EIR must comprehensively analyze and model the physical deterioration of roadway pavements in adjacent Oakland jurisdictions resulting from the project's construction and operational traffic. Under CEQA, a lead agency must evaluate direct and reasonably foreseeable indirect physical changes to the environment caused by a project. The introduction of heavy vehicle traffic, ambulances, commercial delivery trucks, and hundreds of daily commuter trips will cause drivers to bypass regional highways and funnel directly through residential cut-throughs in the Golden Gate neighborhood, including 52nd, 53rd, 54th, and 55th streets.

Residential roadways are structurally engineered for significantly lower vehicle-weight baselines and lower multi-axle traffic volumes than major arterials. The addition of a share of the projected 20,000 daily vehicle trips will dramatically accelerate pavement fatigue along these narrow local streets.

Because the project is located outside of Oakland city limits, this cross-jurisdictional spillover shifts a profound operational and financial burden onto the City of Oakland. It directly strains OakDOT's Pavement Management Program and Public Works maintenance budgets, which operate under strict fiscal constraints and resource-allocation models. This project creates an inequitable environment where the applicant reaps the fiscal benefits of the development, while Oakland's local infrastructure assets are degraded, forcing OakDOT to prematurely expend

local tax and bond revenues to repair structural road damage caused by a non-Oakland medical campus.

Accordingly, we request that the Draft EIR include the following studies and mitigations:

1. Pavement Life-Cycle Impact Analysis: Use a recognized pavement design life-cycle model to quantify how the projected traffic will decrease the lifespan of pavement on 53rd St., 54th St., 55th St., and surrounding North Oakland corridors.
2. Heavy Vehicle Load Modeling: Explicitly isolate and model the structural impact of heavy-duty multi-axle vehicles—including emergency ambulances, medical waste disposal logistics vehicles, and facility delivery trucks—rather than relying solely on average passenger vehicle weights.
3. Inter-Agency Mitigation Framework: Establish a binding mitigation measure requiring the applicant to enter into an infrastructure maintenance agreement or provide proportional "fair-share" financial contributions directly to OakDOT. These funds must be explicitly earmarked for the accelerated rehabilitation, resurfacing, and maintenance of the specific Oakland neighborhood streets impacted by hospital-bound cut-through traffic.

5) Overall impact on various pending and ongoing projects to North Oakland

Given all of these considerations, pursuant to CEQA Guidelines Section 15130, we request that the EIR conduct a formal Cumulative Traffic Impact Analysis that models the combined, interlocking gridlock of the Sutter Emeryville Medical Center project, the ongoing UCSF Benioff Children's Hospital expansion, and Martin Luther King Jr., Way Complete Streets Paving Project and their effects on Oakland. North Oakland streets cannot simply be treated as parking and access roads for medical facilities. We walk here. We bike here. We shop here. We raise families here. We go to the Senior Centers here. This EIR must take into account the real, specific concerns of North Oakland residents.

Sincerely,

Diana and Byron Soublet

37-Year Residents of the Golden Gate Neighborhood

dsoublet@yahoo.com / soublet@sbcglobal.net

Exhibits:

EXHIBIT A: Confusing and dangerous intersections
Date Captured: June 22, 2026 7:42am
Location: Adeline St. at 53rd. St. and Lowell St., facing west



Exhibit Description: This intersection is particularly chaotic, causing traffic traveling west on 53rd St. (toward the proposed hospital) to stop at Adeline St., make a right turn, then immediately make a left turn through the intersection of Adeline St., Lowell St., and 53rd St. (an intersection that is uncontrolled when traveling westbound). While westbound traffic on 53rd St. stops only once at this confusing intersection, cars traveling east, north, or south from Lowell St. or 53rd St. have to make two stops, then navigate free-flowing traffic on Adeline St. to continue their journey.

Legal Relevance under CEQA: This evidence documents a highly erratic, non-standard intersection alignment operating under failing baseline conditions, directly triggering a mandatory analysis under CEQA Appendix G, Section XVI (Transportation), Checklist Question (c), which requires an evaluation of whether a project will *"substantially increase hazards due to a geometric design feature... or incompatible uses."*

Introducing high-volume project traffic—navigated by transient hospital visitors, out-of-area delivery logistics providers, and emergency vehicles unfamiliar with this irregular intersection layout—represents a direct intensification of a geometric hazard and an incompatible use. The EIR must execute a discrete peak-hour intersection capacity simulation for this specific multi-leg intersection and evaluate developer-funded geometric modifications.

Furthermore, because this intersection sits within the City of Oakland just one block from the Emeryville border, the Lead Agency (City of Emeryville) cannot omit it from the EIR under the guise of municipal borders. Under established California environmental law (*City of San Diego v. Board of Trustees of California State University* (2015) 61 Cal.4th 930), a lead agency's obligation to evaluate and mitigate significant environmental impacts extends beyond its own territorial boundaries.

The Draft EIR cannot rely on generalized or aggregated traffic models. It must execute the same level of analysis and micro-simulations for the 53rd St. corridor in Oakland that it does for the 79 Emeryville intersections specified in the scope of work. Should the modeling confirm that project traffic exacerbates this baseline safety risk, the EIR must coordinate with OakDOT to implement binding, multi-jurisdictional mitigation measures, such as developer-funded high-visibility crosswalks and raised bike lanes, daylighting enforcement to restore sightlines, or physical traffic-calming diverters.

EXHIBIT B: Confusing and dangerous intersections
Date Captured: June 22, 2026 7:30am
Location: 53rd St. at 48th St., facing southeast



Exhibit Description: The intersection of 53rd. St and 48th St. in Oakland is a skewed angle intersection. Sight lines are impaired by parked cars on either side of the street. Additionally, there are no crosswalks and no obvious pedestrian paths. Introducing additional cut-through hospital traffic, especially drivers who are not familiar with the area and traffic patterns will exacerbate a dangerous environment for all modes.

Legal Relevance under CEQA: This photographic evidence constitutes substantial evidence under CEQA Guidelines Section 15384, documenting a pre-existing, hazardous baseline condition characterized by substandard geometric design, impaired motorist sightlines, and a complete lack of pedestrian safety infrastructure.

This disclosure directly triggers the mandatory analysis required under CEQA Appendix G, Section XVI (Transportation), Checklist Question (c), which requires the lead agency to determine whether a project will *"substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses."* The introduction of an estimated 20,000 daily project-related vehicle trips—navigated by transient hospital

patients, emergency medical operators, and delivery logistics drivers unfamiliar with local street configurations—will dynamically shift traffic onto this sub-arterial residential grid via real-time GPS rerouting algorithms. Forcing high-volume commercial and commuter traffic through a highly skewed, non-standard intersection layout that lacks basic pedestrian crossings represents a severe "incompatible use" and a direct intensification of a geometric hazard.

EXHIBIT C: Narrow, easily blocked streets
Date Captured: July 2, 2026 10:51am
Location: 1092 53rd St., facing west



Exhibit Description: A California Waste Solutions truck stopped to empty residents' recycling carts. With cars parked on either side of the street, traffic cannot pass in either direction.

Legal Relevance under CEQA: This photographic documentation provides direct substantial evidence under CEQA Guidelines Section 15384 of an existing physical constraint within the baseline transportation grid that the EIR must fully evaluate. Under CEQA Appendix G, Section XVI (Transportation), Checklist Question (a) (conflict with a program, plan, or policy) and Question (c) (geometric hazards), and Section XV (Public Services), the lead agency must analyze how the project's massive trip generation interacts with narrow residential access corridors.

53rd St. functions as the primary east-west cross-town connection between MLK Jr. Way, Market St, Adeline St, San Pablo Ave and Hollis St, yet its physical geometry is highly constrained. As documented in this exhibit, routine services—such as weekly waste management collections, delivery vehicles, or street maintenance—completely block vehicular flow in both directions due to on-street parking on narrow roadways.

The introduction of an estimated 1,500 to 1,800 peak-hour hospital vehicle trips onto a corridor that physically gridlocks from a single stopped truck creates a severe, foreseeable operational hazard. The EIR cannot rely on generalized, macro-level traffic models that assume continuous, uninterrupted vehicle flow. Instead, the analysis must execute a Granular Corridor Blockage

Simulation to model how routine, daily street obstructions on 53rd St. will interact with hospital-bound traffic. Most critically, the EIR must analyze how these inevitable bottlenecks will physically delay Emergency Vehicle Access (Fire/EMS response times) traversing between North Oakland and the Sutter Health Campus, and must evaluate mandatory mitigations such as structural street widening.

EXHIBIT D: Diversion of traffic to 53rd St.
Date Captured: June 30, 2026 7:37am
Location: 47th St. at Salem St., facing west



Exhibit Description: The intersection of 47th St. and Salem St. A traffic diverter forces westbound traffic on 47th St. onto Salem St., then on to 48th St. Westbound traffic on 47th St. cannot cross San Pablo Ave. and eastbound traffic cannot reach Salem St. The installation of this diverter made 53rd St. the only through street across San Pablo Ave. between 40th St. and Stanford Ave.

Legal Relevance under CEQA: This geographic and structural documentation provides substantial evidence of a severe structural bottleneck in the existing baseline grid that the Lead Agency's environmental analysis must address under CEQA Guidelines Section 15125.

Because parallel alternative routes like 47th St. are physically blocked to cross-town traffic, macro-level mathematical traffic models that assume an equal spatial distribution of trips across a standard grid are fundamentally flawed and legally deficient. Real-time GPS routing algorithms will systematically concentrate project-bound cut-through traffic on 53rd St. This directly triggers a mandatory analysis under CEQA Appendix G, Section XVI (Transportation),

Checklist Question (a) and Question (c). The EIR must explicitly model the localized cumulative volume pressure forced onto the 53rd St. corridor due to these pre-existing physical grid diversions and evaluate binding traffic-calming or multi-jurisdictional circulation mitigations.

EXHIBIT E: Map of vulnerable populations around project site

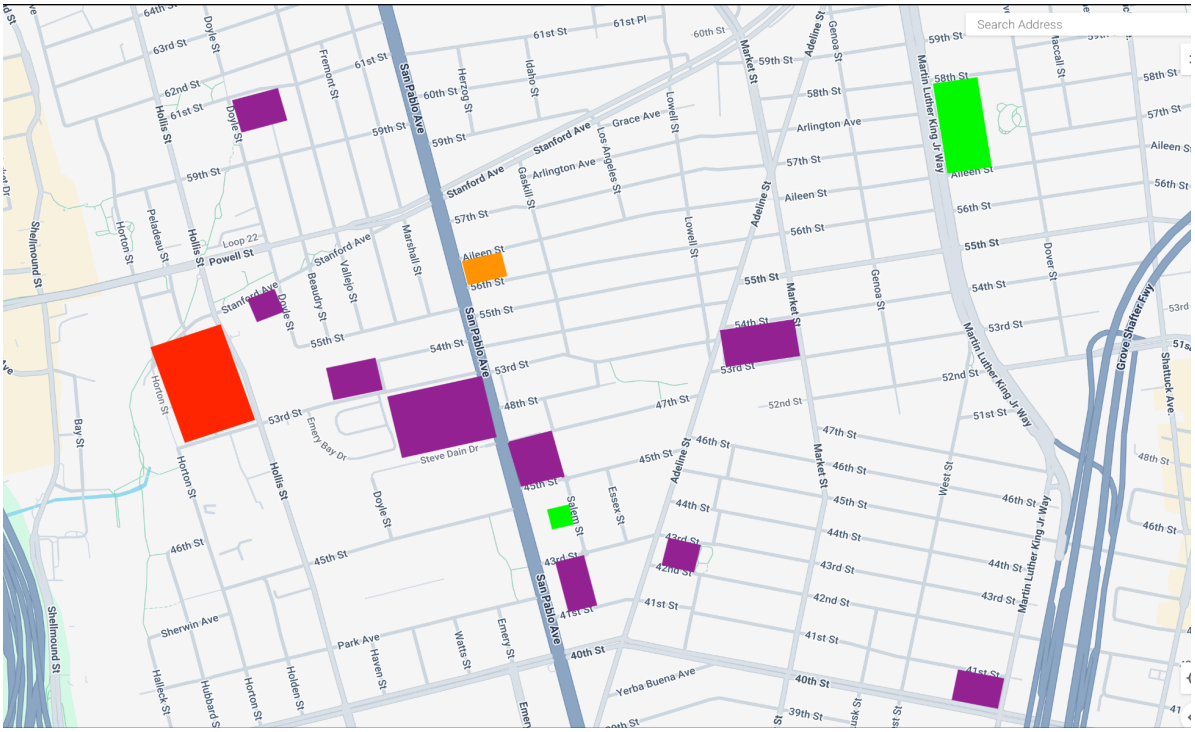


Exhibit Description: A map of vulnerable populations between Martin Luther King Jr. Way and the Sutter project site (in red). Schools are shown in purple, senior centers in green, and Golden Gate Library in orange.

Legal relevance under CEQA: This spatial mapping documentation provides direct substantial evidence under CEQA Guidelines Section 15384 establishing the locations of high-density sensitive human receptors within the project's immediate zone of operational influence. The lead agency is notified that the presence of these specific institutional assets—including schools (purple), the Emeryville and North Oakland Senior Centers (green), and the Golden Gate Public Library (orange)—directly dictates the threshold of significance for non-exempt Air Quality, Noise, and Transportation Safety hazards under CEQA Appendix G.

The EIR cannot evaluate the project's addition of 20,000 daily vehicle trips through generalized, macro-level citywide averages. Under Section III (Air Quality), Checklist Question (c), the lead agency is legally required to analyze whether the project will expose sensitive receptors to substantial pollutant concentrations. Because children and the elderly are highly susceptible to respiratory and physiological harm, the EIR must execute a localized Health Risk Assessment and micro-scale carbon monoxide and particulate matter hotspot modeling at these sensitive receptor sites to measure the impact of idling, gridlocked hospital traffic directly outside these facilities.

Furthermore, under Section XVI (Transportation), Checklist Question (c) (increased hazards due to incompatible uses) and Section XIII (Noise), the mapping of these assets establishes that the project introduces an incompatible operational use (a massive regional medical campus) into a

low-speed, high-pedestrian community hub. The EIR must explicitly analyze the cumulative pedestrian-vehicle conflict risks for vulnerable populations (young children and mobility-impaired seniors) crossing 53rd St. and San Pablo Ave, and evaluate structural, developer-funded mitigations—such as signalized pedestrian crossings and physical traffic-calming buffers—directly protecting these mapped locations.

EXHIBIT F: Poor sight lines at irregular intersections
Date Captured: September 2, 2026 11:39am
Location: 53rd St. at Lowell St., facing east



Exhibit description: Dumpsters almost completely obscure a driver's sight line on Adeline at the intersection with 53rd St. Sight lines are even worse at times when there are high-cube delivery trucks parked where the dumpsters are located. Since traffic on Adeline St. does not stop at the intersection with 53rd St., this cyclist (circled, but barely visible) would not be required to stop at the intersection, risking vehicular collision.

Legal relevance under CEQA: This photographic evidence constitutes direct substantial evidence under CEQA Guidelines Section 15384, establishing that the multi-leg intersection of 53rd St., Lowell St., and Adeline St. currently operates under severe physical sightline obstructions. Under CEQA Appendix G, Section XVI (Transportation), Checklist Question (c), the lead agency must evaluate whether the project will "substantially increase hazards due to a geometric design feature or incompatible uses".
Adding thousands of daily project trips—operated by drivers, emergency personnel, and delivery vehicles unfamiliar with this layout—will funnel high-volume traffic directly through an

existing blind spot. Forcing non-local traffic through a complex, semi-controlled intersection where sightlines are physically blocked by routine curbside dumpsters and delivery trucks creates an incompatible use and intensifies a geometric hazard.

Outlook

Sutter Hospital Medical Center EIR

From Dylan Kievit <dylan.kievit@gmail.com>
Date Mon 9/14/2026 4:55 PM
To Miroo Desai <mdesai@emeryville.org>

Hello Ms. Desai,

I am writing to request that 53rd St. between San Pablo Ave. and Adeline be analyzed by the EIR, especially during morning and afternoon commute/pickup/dinner time. This narrow road is already congested, with frequent full blockage due to pickup and dropoff at a daycare, as well as package and food deliveries. It includes an unmarked crossing to Temescal Creek Park which is frequently used by children, families, and folks walking their pets. Additionally, the 53rd St & San Pablo intersection is so narrow on the east side that it routinely comes to a standstill when there is two way traffic and cars parked on both sides of the street. I don't understand why this was excluded in the initial study corridor as it is a direct crossing from MLK Jr Way.

Please reconsider the scoping of this EIR.

Thanks,

Dylan Kievit
988 53rd St
Oakland, CA 94608

Outlook

Sutter NOP Comments

From Eleanor Wohlfeiler <ewohlfeiler@gmail.com>
Date Mon 9/14/2026 11:37 AM
To Miroo Desai <mdesai@emeryville.org>
Cc Unger, Zachary <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>

Miroo Desai, AICP,
Planning Manager, City of Emeryville,
1333 Park Avenue,
Emeryville, CA 94608

CC: Councilmember Zac Unger
Councilmember Rowena Brown
Councilmember Ben Bartlett
Councilmember Terry Taplin
William Gilchrist, City of Oakland
Josh Rowan, City of Oakland
Jordan Klein, City of Berkeley,
Jamie Parks, City of Berkeley

September 14, 2026

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I have read through the Notice of Preparation for EIR. I'm not an expert in city planning but understand this EIR will be quite comprehensive. I write to respectfully request that the scope of the EIR includes a more robust transportation analysis.

We all hope that, twenty years from now, this area will be vibrant, accessible & equitable for all. And the way we can achieve that is to plan for it today. Thank you for the work you're doing to ensure this new hospital campus will not just meet current standards but will raise the bar and elevate our community.

Transportation Analysis: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor

ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and neighboring Oakland and Berkeley.

Requests:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute or further bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.
b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the likelihood of traffic violence causing injuries and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.
   Please also evaluate the pollution (air, noise and other) caused by increased car traffic.
c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.
d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.

e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:
    i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.
    ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.
f. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:
    i. 40th Street: Broadway to Shellmound
    ii. 53rd Street: Adeline to Horton
    iii. 55th Street: Telegraph Avenue to Doyle Street
    iv. Adeline Street: West Grand to Ashby BART
    v. Alcatraz Avenue: Adeline to San Pablo
    vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
    vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
    viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,

Eleanor Wohlfeiler
1179 64th Street
Oakland 94608

GECO
Grassetti Environmental Consulting

Ms. Miroo Desai, AICP
Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608
mdesai@emeryville.org

September 14, 2026

SUBJECT: Emery Bay Village - Sutter Health Campus NOP Responses

Dear Ms. Desai,

Grassetti Environmental Consulting (GECo) has prepared these comments on behalf of the Board of Directors of the Emery Bay Village Homeowners Association (Emery Bay Village), in response to the Notice of Preparation for the Environmental Impact Report on the proposed Sutter Hospital Medical Center in Emeryville. Emery Bay Village is a residential complex located on 53rd Street between Hollis Street and San Pablo Avenue, comprising 112 units across over 40 buildings and home to hundreds of residents. Emery Bay Village constitutes a key stakeholder group. Situated approximately one to two blocks east of the proposed Sutter site, 53rd Street between Hollis Street and San Pablo Avenue runs through Emery Bay Village, the Emeryville Child Development Center, Anna Yates TK-8, and Emery High School. *(See attached satellite image showing the project site, Emery Bay Village and nearby schools)*.

Because of the size and scale of the project, and its location near numerous sensitive receptors, the EIR analyses will need to be detailed and the mitigation measures comprehensive. This is clearly a Project of Regional Concern as defined in CEQA Guidelines Section 15206, and should be evaluated as such. Further, due to the project's size and scale, a Water Supply Assessment is required for the project per California Public Resources Code section 21151.9 and Water Code sections 10910–10912.

The primary impacts that Emery Bay Village would experience are likely traffic related, congestion, safety / emergency access, noise, air toxics, dust. On p. 29 of the project figures, 53rd Street is shown as one of the major circulation routes for the project traffic. The ambulance circulation figure shows 53rd Street as a "secondary" ambulance route.

These impacts would occur both during construction and during operation after the construction ends. Under CEQA parking and traffic congestion, themselves, are not potentially significant impacts, however traffic hazards / access / emergency response hinderance, etc. are still CEQA impacts, as are noise and air

quality. In addition to traffic noise, repeated single-event helicopter noise could be a major disruptor, especially at night.

Therefore, Emery Bay Village is requesting detailed analyses of each of these topics as described below.

Traffic

Emery Bay Village requests that the selected shuttle location, ambulance circulation, shuttle circulation, service vehicles circulation, construction truck circulation, passenger drop-off/pick-up circulation, and other site plans be the least adverse to Emery Bay Village and the three schools on 53rd Street. Locating a 24/7 shuttle depot and all its associated bus traffic closer to Emery Bay Village and the three schools could result in conflicts and safety hazards to students walking to school, cyclists who use 53rd Street, and residents at Emery Bay Village. Note that there's already substantial traffic and pedestrian use along the segment of 53rd Street between San Pablo Avenue and Hollis Street, and vehicular access already is impeded by cars waiting to drop off and pick up students from the three schools on 53rd Street at those hours.

Emery Bay Village requests that the EIR study an access plan where the designated access to the site from San Pablo Avenue is Stanford/Powell/Hollis, never 53rd Street. The EIR should study corridors that avoid 53rd Street between Hollis Street and San Pablo Avenue. In addition, the traffic study of 53rd Street must include specific analyses of the project's impacts at the schools' pick-up and drop-off periods, and not just the standard peak-hour traffic periods.

In order to mitigate the project traffic's potential for substantial conflict with the schools' vehicular, pedestrian, and cyclist activities, and to avoid safety hazards / and disruption of emergency access for the three schools and Emery Bay Village residents, the EIR shall include the following mitigation measures:

- Construction trucks, shuttle buses, ambulances, hospital and service vehicles shall be excluded from 53rd Street between Hollis Street and San Pablo Avenue – even for limited access or secondary access. 53rd Street between Hollis Street and San Pablo Avenue must be protected from excess traffic and emergency vehicles because it is a key walking path for students.
- If secondary access routes are needed, other streets should be designated that avoid the school corridor along 53rd Street.
- Infrastructural and other relevant designs to prevent 53rd Street between Hollis Street and San Pablo Avenue from being used by hospital-related foot traffic and hospital-related vehicles (including visitors, service vehicles, hospital staff vehicles, rideshare).
- Safe passage for school children should be the foundational baseline for evaluating the project, by which construction trucks, ambulances, shuttle buses, service vehicles etc. to be kept off 53rd Street (especially between Hollis Street and San Pablo Avenue).
- Amend the City's General Plan to add 53rd Street between San Pablo Avenue and Hollis Street as a designated Pedestrian Priority Zone. Every school day, students from the schools converge on

one block to get to school, but 53rd Street is not yet a pedestrian priority zone in the City of Emeryville General Plan *(See attached General Plan Figure 5-3)*. While the school section itself is zoned as pedestrian priority, the street that most students use to get to school is not. The project should include amending the General Plan to apply Pedestrian Priority Zone designation to the entire 53rd Street between Hollis Street & San Pablo Avenue radius. Between Hollis Street and San Pablo Avenue, 53rd Street connects through Emery Bay Village multi-family housing, Spur Alley (including a youth gymnastics center), a preschool, an elementary school, a middle school, and a high school.

Parking

The project's Trip Generation Analysis uses a 35% reduction in employee parking demand assumption from TDM measures, but that was based on a Sutter hospital in San Francisco (California Pacific Medical Center), which is far more urban and has a far more robust public transit system than Emeryville. Please revise this analysis using reduction estimates from suburban Sutter medical centers, which would be more indicative of this site. Also, please include parking space counts on nearby streets to identify the project's impacts on parking on those streets. Although parking itself is not a CEQA issue, secondary associated impacts including air quality, noise, and GHG emissions, as well as access issues, are CEQA concerns.

Noise

The project will generate significant noise from traffic, construction activities, helicopter activities, and emergency operations, including ambulance sirens. These will be very disruptive to the community. Therefore, the EIR should address the following noise considerations:

- Construction noise must be considered long-term impacts, due to the 10-year construction period.
- Noise monitoring locations for the EIR setting shall include a site within Emery Bay Village and one at each of the three nearby schools facing 53rd Street.
- Note that the hospital would be a 24/7 operation, so noise measurements must reflect that.
- Noise from sirens and helicopter operation shall not be considered in time-averaged metrics, but rather as repeated single-event noises, because the average is meaningless with respect to sleep, school, and work disruptions associated with occasional very loud noises. Loud repeated single event noise (such as pile driving and helicopter flights) shall be evaluated separately from the time-averaged general traffic or construction noise. Please review *Berkeley Keep Jets Over the Bay vs. Board of Port Commissioners* (2002) CEQA appellate court decision, which requires the analysis of single event noise separately from time-averaged noise.
- Helicopter noise studies must be based on actual measurements of helicopters at similar facilities, such as Children's Hospital, Oakland. Noise from helicopter landings and take-offs from that facility should be measured and then used for the proposed project. Both daytime and nighttime

single-even noise impacts should be addressed. Further, noise impacts on the three schools on 53rd Street should each be considered separately.

- Eliminate the helipad or strictly limit its uses to only emergency events and prohibit nighttime helicopter flights except in region-wide emergencies (i.e. earthquake) or mass-casualty events. Prohibit all non-medical helicopter access.
- Prohibit construction truck traffic on 53rd between Hollis Street and San Pablo Avenue.
- Minimize ambulance traffic/sirens on Hollis Street between 47th and 54th Streets.
- Mitigation eliminating the use of sirens within a quarter mile of the facility should be included.

In addition, prior to conducting the EIR analyses, the project description needs to be stabilized and fleshed out.

Project Description Issues

A finite and stable project description is the *sine qua non* of an environmental impact report.[1] The impacts analysis cannot be accurate if the project description is inaccurate, unstable, in progress, or incomplete. The description for this project is unstable and incomplete as follows:

- Which shuttle stop location is included?
- How will the on-site parking deficiency be addressed?
- Disposition of existing traffic barrier on Horton Street.
- Proposed construction access/egress routes.
- Will there be pile driving?
- Are parts of the site contaminated - if so, how much contaminated soil and groundwater would be off-hauled/treated?
- Would dewatering be necessary?
- How deep would excavations be?
- How many construction truck trips would occur in each phase?
- The NOP says the hospital tower would be 330 feet tall - this is far more than the 15 (or 17) stories disclosed in the NOP. Therefore, in terms of height, the project is much closer to 30

[1] In *Stopthemilleniumhollywood v. City of Los Angeles,* (2019) 2019 Cal.App.LEXIS 780, the Second District Court of Appeal held an environmental impact report ("EIR") prepared pursuant to the California Environmental Quality Act ("CEQA") was invalid for lack of an "accurate, stable, and finite" project description and no unusual circumstances were present allowing otherwise.

stories. It would be one of the tallest buildings in the east bay[2]. At this height, it would be taller than the massive Pacific Park Plaza, a 30-story residential tower reaching just 318 feet. At this height, and this close to the Bay, view alteration and blockage would be a major concern. The EIR must correctly characterize the tower's height in feet and not stories and then analyze the aesthetic, wind, and shadow impacts on public spaces of the project. Photo-simulations from the Bay, Emeryville Marina, the Berkeley Hills, and the Bay Bridge must be included.

- The proposed use of the helipad must be disclosed, including frequency, purpose and timing of flights.
- The use of the Building 1 site needs to be determined at the start of the CEQA process.
- CEQA does not permit project piecemealing and those other facilities are, in effect, parts of the overall Sutter project. In fact, Sutter should consider doing a Master Plan and Program EIR on all of the related facility changes. Further, the potential improvements on those facilities should be included in the Project Description and/or the Cumulative Impacts section.
- The EIR must analyze associated changes in use at other Sutter hospitals in the region including:
    - The NOP postulates the potential use of parking at other Sutter hospitals. Where and how many spaces?
    - What will happen to Alta Bates and other local Sutter hospital facilities after the project is constructed? Which will be closed? What's the proposed future use of those facilities once the hospital uses are moved.

Alternatives

Under CEQA, alternatives are intended to reduce or eliminate potentially significant project impacts. Alternatives in the EIR should focus on reducing aspects of the project to minimize impacts to the area, including, but not limited to:

- An overall 40 - or 50% reduction of all aspects of the project, and reduction of the hospital to the originally proposed 200 beds.

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[2] Oakland features 12 completed high-rise buildings that reach heights of **330 feet (100 meters) or more**, forming the core of the East Bay's tallest architectural cluster. The tallest East Bay buildings (330+ Feet) are:

- **Ordway Building (One Kaiser Plaza)**: 404 feet (123 m) — Oakland's tallest skyscraper, completed in 1970 with 28 stories.
- **Atlas (1314 Franklin Street)**: 403 feet (123 m) — A major residential high-rise tower serving as the city's second-tallest structure.
- **Kaiser Center**: 390 feet (119 m) — Completed in 1960, this 28-story office building neighbors Lake Merritt.
- **Lake Merritt Plaza (1999 Harrison Street)**: 371 feet (113 m) — A 27-story commercial high-rise finished in 1985.
- **1111 Broadway**: 360 feet (110 m) — A 24-story downtown office tower.
- **Kaiser Engineering Building**: 336 feet (102 m) — An established commercial high-rise in the downtown district.
- **Clorox Building (1221 Broadway)**: 330 feet (100 m) — A 24-story headquarters building designed by Cesar Pelli.

- An overall 40-50% reduction in offices and /or housing.
- Eliminate the Emeryville hospital from the project and, instead, rehab Sutter's existing hospitals, including Alta Bates, which would better serve local communities and reduce VMT.
- The Building 1 site should be either a park or another parking garage, and not the proposed housing or offices.
- Alternate shuttle stop locations: Consider using the Building 1 site for the shuttle along with a park area, and also retaining the existing park. This could remove potential shuttle traffic from 53rd street, and Horton Street. Another possible shuttle stop could be along the loop road around the proposed bioretention area near Building 2/3.
- Eliminate the heliport in combination with a reduced development project.
- Alternative sites for the project - dispersed hospitals as at present rather than a single mega-hospital complex.
- Upgrade Sutter's other hospitals in the area instead of building a mega hospital.

Additional Studies

Emery Bay Village is requesting that the EIR conduct the following additional studies.

- Cumulative development projects/analyses - other substantial projects nearby with possible overlapping impacts must be considered? Further, as discussed above, the ultimate disposition of other facilities from which hospital uses will be transferred to this facility must be identified and fully analyzed.
- Air quality/health risks associated with the nearby schools, and other sensitive receptors including Emery Bay Village and the three schools on that block that face 53rd Street west of San Pablo Avenue must be evaluated. This includes TAC screening at each of the schools and Emery Bay Village for all phases of construction and operation.
- Traffic analyses for both the project ***and alternatives*** must consider additional Vehicle Miles Traveled (VMT) as a result of the project. More local hospitals would reduce VMT more than a single regional hospital.
- Finally, all analyses should consider the nearest similar campus as a model for patient and traffic generation, namely the Kaiser complex in downtown Oakland. Given that accurate service population estimates are key to correctly identifying the project's impacts, we are requesting that you compare the population and traffic associated with all of the Kaiser buildings in terms of sq. ft. with those assumed for the proposed project. The Kaiser complex traffic and visitor numbers should be measured and then used per sq. ft. or otherwise normalized for use on the Sutter

project. Note that Kaiser is much more BART accessible than Sutter. All service population calculations and underlying assumptions must be included in the DEIR.

- Given the major addition of population proposed by the project, the EIR must address the potential for additional criminal activity and potential safety issues associated by that activity generated by the project.

Conclusions

Emery Bay Village is concerned that the CEQA process for this project has been initiated prematurely. Emery Bay Village would like all items identified in the discussion of Project Description Issues, above, to be addressed prior to initiation of the DEIR. Emery Bay Village looks forward to continuing working with the City and the applicant to create a project that is workable for all. Please contact us (email here) if you have questions or need any clarification regarding these comments.

Sincerely



Richard Grassetti

Principal, Grassetti Environmental Consulting, Inc.

Attachments:

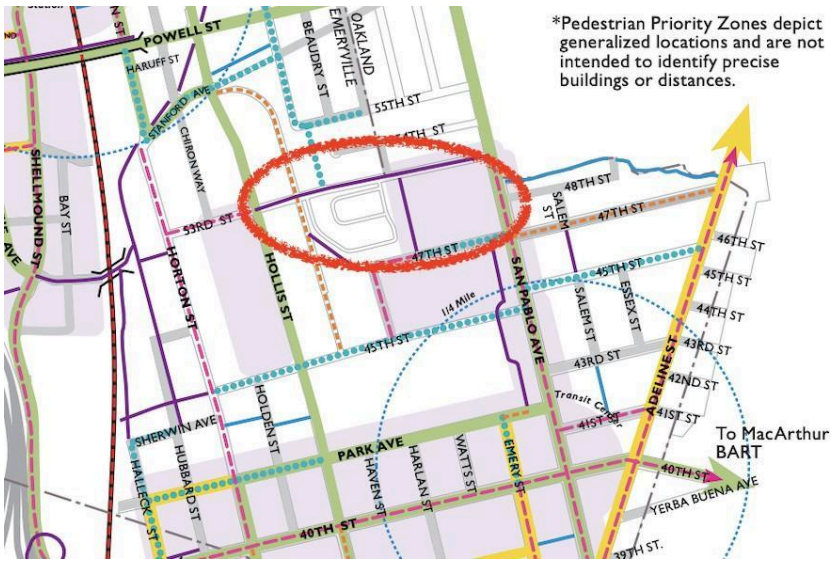
Satellite Image
General Plan Figure 5-3

Attachments

Annotated satellite image of 53rd Street showing the proposed Sutter site, Emery Bay Village, Emeryville Child Development Center, Anna Yates TK-8, Emery High School



City of Emeryville General Plan (annotated)
Figure 5-3: Current Designated Pedestrian Priority Zones



Outlook

Sutter NOP Comments

From Eric Arico <eaarico@gmail.com>
Date Sun 9/13/2026 4:26 PM
To Miroo Desai <mdesai@emeryville.org>
Cc zunger@oaklandca.gov <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>

Dear Ms. Desai,

I work for the City of Oakland, but I'm writing today because I live on 54th St between Boyer St and San Pablo Ave, and my son attends Anna Yates Elementary School on 53rd St. I'm in favor of the Sutter Hospital Development, but I have concerns about it's potential traffic impacts, particularly on 53rd St, between Hollis St and San Pablo Ave. This stretch of 53rd St already becomes somewhat congested during school pick-up and drop-off hours.

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I write to respectfully request that the scope of the EIR includes the following transportation analysis.

Transportation Analysis: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and surrounding communities.

Requests:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.
b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the likelihood of traffic violence causing injuries and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.

c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.
d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.
e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:
    i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.
    ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.
f. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:
    i. 40th Street: Broadway to Shellmound
    ii. 53rd Street: Adeline to Horton
    iii. 55th Street: Telegraph Avenue to Doyle Street
    iv. Adeline Street: West Grand to Ashby BART
    v. Alcatraz Avenue: Adeline to San Pablo
    vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
    vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
    viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,
Eric Arico, PE

Outlook

Sutter NOP Comments

From Eric Pankonin <elpank@yahoo.com>
Date Mon 9/14/2026 10:22 AM
To Miroo Desai <mdesai@emeryville.org>
Cc zunger@oaklandca.gov <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>

Miroo Desai, AICP,
Planning Manager, City of Emeryville,
1333 Park Avenue,
Emeryville, CA 94608

CC: Councilmember Zac Unger
Councilmember Rowena Brown
Councilmember Ben Bartlett
Councilmember Terry Taplin
William Gilchrist, City of Oakland
Josh Rowan, City of Oakland
Jordan Klein, City of Berkeley,
Jamie Parks, City of Berkeley

September 11, 2026

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I have read through the Notice of Preparation for EIR and have made the best sense of it as I can as a lay person. I write to respectfully request that the scope of the EIR includes a more robust transportation analysis.

We all hope that, twenty years from now, this area will be vibrant, accessible & equitable for all. And the way we can achieve that is to plan for it today. Thank you for the work you're doing to ensure this new hospital campus will not just meet current standards but will raise the bar and elevate our community.

Transportation Analysis: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and neighboring Oakland and Berkeley.

Requests:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute or further bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.
b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the likelihood of traffic violence causing injuries and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.
   Please also evaluate the pollution (air, noise and other) caused by increased car traffic.
c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.
d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.
e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:
    i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.
    ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.
f. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:
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v. Alcatraz Avenue: Adeline to San Pablo
vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,

Eric Pankonin
1179 64th Street
Oakland 94608

Gail Donaldson
Emeryville Resident
September 14, 2026

Miroo Desai, AICP
Planning Manager, City of Emeryville
1333 Park Avenue
Emeryville, CA 94608
mdesai@emeryville.org

Re: Comments on Sutter Medical Center EIR Scope

Dear Ms. Desai,

I am submitting comments regarding the scope of the EIR for the proposed Sutter Medical Center. I request that these comments be considered in the EIR.

1) Construction Impacts

The lengthy construction period projected by the applicant warrants a detailed and careful consideration of a range of impacts.

a. Air Quality: As an almost 30 -year resident of Emeryville I am very aware of the particulate matter generated by train and freeway traffic through the city. The EIR should specifically measure, project, and analyze the cumulative levels of the anticipated particulate and other air pollutants during times of freight and passenger train transit through Emeryville, and during high volume freeway periods.
b. Noise: The noise generated by the project's construction will likely cause disturbance and disruption not only to residents, schools and daycares, but to local businesses, particularly those with outdoor seating, such as local restaurants. Construction noise level analysis should include detailed maps of projected noise levels from various construction activities, including pile driving, excavation, truck movement, etc. Assumptions regarding work types by construction phase, and a more specific projection of the timing and duration of such activities should be provided.
c. Hazards and Hazardous Materials, Geology, Soils, Seismic Hazards: Given the extensive history and records of hazardous materials under the project and adjacent sites, serious consideration must be given to the dangers of disturbance. In particular, the weight and the required pile depths of the hospital building must be analyzed in terms of potential damage to groundwater aquitards. Potential impacts of dewatering, and vibrations

during pile driving and excavations must be thoroughly analyzed to determine the impacts on the Temescal Creek culvert and other adjacent infrastructure.

d. Recreation: Construction activities including noise generation, truck activity and potential pedestrian and bicycle route disruptions will likely render the park, path and open spaces on and adjacent to the site undesirable or unusable for any rest and relaxation. The EIR should require a detailed design and phasing plan setting forth realistic plans for prioritizing usable recreation space and providing buffering from construction interference.

2) Ongoing Concerns

a. Recreation: The proposed uses are projected to bring approximately 15,000 physicians, employees and daily visitors to the site. Considering the city's existing deficit of parks, this presents a strain on the city's recreational capacity. The project will add an approximately 0.6 acre park to the area at the PDU site, but will reduce other existing publicly accessible open spaces. Several of the identified open space areas have limited recreational value, such as The Paseo, which is a pass through between 2 large buildings with benches with their backs to the limited greenery, Chiron Plaza, which is shown as an island of planting surrounded by Building 2/3 vehicular circulation, or the remaining portion of Hollis Green Park, which will be diminished by 25% to accommodate shuttle service. The EIR should analyze each of the publicly accessible open spaces for its functionality and its contribution to the recreational needs of the employees, visitors, and local residents.

b. Public Services: In analyzing the impacts that the project will have on the public services, in addition to police and fire public safety services, the EIR must analyze the additional demands the project will create on the Department of Public Works for maintenance of the City's roadways, stormwater, sewer, and other infrastructure that will result from the intensified use. In view of the city's ongoing budget deficit, meeting the future needs for public services must be seriously considered.

Sincerely,

Gail Donaldson

August 26, 2026

Miroo Desai, AICP
Planning Manager
City of Emeryville, CA

Dear Ms. Desai,

I am submitting these comments regarding the scope of the Environmental Impact Report for Sutter Health's proposed Emeryville Medical Center.

I want to be clear about my perspective. I do not believe the City of Emeryville should amend the existing Chiron PUD/PDP and General Plan to accommodate Sutter's proposed hospital. Hospital use is not currently permitted under the applicable Office/Technology land-use designation. Sutter is also proposing a 330-foot building where the existing PUD/PDP permits a maximum height of 225 feet. These standards reflect choices Emeryville has already made about the appropriate uses, scale and character of this site, and should not simply be changed to make this particular proposal possible.

I understand the decision on these amendments will come later, and that the EIR's purpose is to evaluate environmental effects, mitigation measures and reasonable alternatives — which is exactly why its analysis of alternatives matters so much.

Despite Sutter's recent revisions, the core proposal remains a 785,000-square-foot, 330-foot, 24-hour hospital, plus conversion of approximately 563,200 square feet of existing buildings to medical office uses. The revisions do not change the fundamental scale or nature of that proposal.

In summary, I am asking that the EIR: (1) evaluate an alternative in which the City retains its existing planning framework and does not amend the General Plan and PUD/PDP to permit hospital use on this site; (2) rigorously study traffic and safety impacts on Stanford Avenue and 53rd Street, including effects on childcare and school schedules and hospital shift changes; (3) analyze the parking deficit, off-site parking and shuttle system; (4) evaluate the net loss and reconfiguration of Hollis Green; (5) address impacts of the roughly ten-year construction buildout; (6) disclose and evaluate helipad and 24-hour operational impacts, including nighttime noise; (7) evaluate contamination and hazardous materials exposure; (8) extend impact analysis to North Oakland and Berkeley, including Alta Bates-related shuttle traffic, the Ashby Avenue/Adeline Street/Stanford Avenue/Powell Street cut-through corridor, and the cross-city route linking Alta Bates Summit to the proposed Emeryville campus; and (9) meaningfully evaluate a no-amendment alternative and other alternatives that substantially reduce the project's scale.

I particularly ask the EIR to address the following:

1. Stanford Avenue traffic, bicycle and pedestrian safety

The EIR transportation study should specifically include Stanford Avenue/Powell Street between (1) Hollis Street and San Pablo Avenue, (2) Stanford Avenue between San Pablo Avenue and Adeline Street, and (3) Adeline Street between Stanford Avenue and Ashby Avenue in Berkeley, rather than limiting analysis to streets immediately surrounding the project. Stanford is a neighborhood route and bicycle boulevard providing access to parks, childcare, and cut-through access to I-80.

The EIR should establish existing conditions on this corridor and evaluate whether hospital-generated traffic, freeway or arterial congestion, changes to the 53rd Street and Horton Street diverters, or navigation-based rerouting could increase vehicle volumes, speeds, turning conflicts or cut-through traffic

— including during childcare arrival and pickup periods, hospital shift changes, and relevant weekday and weekend conditions.

This corridor is already a heavily used, dangerous cut-through route: Adeline Street transitions directly into Stanford Avenue, which continues into Powell Street near Horton and Hollis Streets by the Emeryville Greenway, forming a direct path from Berkeley to the entrance of the MacArthur Maze and the Bay Bridge. Adeline Street, Stanford Avenue and Powell Street are, in effect, a single roadway under three different names as it crosses from Berkeley through Golden Gate/North Oakland into Emeryville. That regional bottleneck is already under significant strain: the Metropolitan Transportation Commission reports Bay Bridge traffic has recovered to roughly 90 percent of pre-pandemic levels, and a University of California, Berkeley transportation researcher has found morning Bay Bridge commute speeds running about 32 percent slower than pre-pandemic levels even before volumes fully recovered; a 2026 nationwide survey ranked the Maze-to-Bay-Bridge commute the most frustrating in California. Drivers on this cut-through already speed, particularly approaching Stanford Avenue/San Pablo Avenue. The EIR should evaluate the extent to which project traffic — including Berkeley-bound shuttles and off-site parking trips — would add to an already over-capacity regional corridor, and should extend its emergency-response travel-time analysis for Alameda County Fire Stations #34 and #35, currently limited to areas south of the project, to cover Stanford Avenue and the Adeline/Ashby corridor to the north and east.

I can speak to this firsthand. On August 26, 2026, at approximately 3:11 p.m., I was driving west on Adeline Street toward Emeryville and followed a Sutter Health shuttle bus, marked "Emery Yards / Alta Bates," as the road became Stanford Avenue (see Appendix 1). The shuttle was considerably larger than I had expected and appeared to be traveling at least 10 miles per hour over the posted speed limit. It then turned left from Stanford Avenue onto Hollis Street at the already busy Powell Street/Hollis Street intersection. This is a single existing shuttle; the project's planned employee shuttle fleet of approximately 11 vehicles arriving every 5 minutes at peak hours, described in Item 3 below, would multiply this pattern many times over on a corridor that is already dangerous — not only for vehicles, but for pedestrians and cyclists.

This corridor's dangers are not hypothetical. In 2003, cyclist Matthew Sperry was killed on Powell Street near Vallejo Street while bicycling to work in Emeryville; a memorial "ghost bike" marked the location for many years, and a second fatality had previously occurred near the same intersection. More than two decades later, this stretch remains a recognized safety priority: City engineering staff have acknowledged it still lacks meaningful bicycle infrastructure and recently sought, unsuccessfully, county grant funding to redesign it. Adding a large hospital shuttle fleet to this same corridor, on top of the cut-through traffic described above, would materially increase risk not only to motorists, but also to cyclists and pedestrians on a route the City itself already recognizes as dangerous.

Relevant EIR issues: Transportation Safety, Bicycle and Pedestrian Facilities, Emergency Access, Air Quality and Noise.

2. 53rd Street, child safety, traffic diversion and emergency access

The EIR should separately study 53rd Street during school and childcare arrival and dismissal periods and during proposed hospital shift changes. It should establish existing conditions and evaluate project-related vehicle volumes and speeds, pedestrian and bicycle movements, turning conflicts, double parking or lane blockage, sight-line and crossing conditions, and the ability of emergency vehicles to pass safely.

The analysis should compare conditions with the existing traffic diverters, the proposed removal of the Horton/53rd diverter, and any proposed new diverter east of Hollis Street. It should also examine whether these changes could move traffic onto other residential streets in Emeryville and North Oakland rather than simply eliminating it.

Relevant EIR issues: Transportation Safety, Emergency Access, Air Quality and Noise.

3. Parking, off-site parking and the proposed shuttle system

The NOP identifies a potential on-site parking deficit of approximately 585 spaces. Public Resources Code section 21099(d) may exempt parking impacts by themselves from CEQA significance for qualifying infill projects in a transit priority area, but even if that exemption applies here, it does not exempt the physical consequences of the proposed parking and shuttle strategy, which deserve careful analysis.

The NOP confirms off-site employee parking is planned near Alta Bates Ashby Hospital in Berkeley and the Alta Bates Summit campus in Oakland, with employees shuttled to and from the Emeryville campus. The employee shuttle fleet (about 11 vehicles) is planned to arrive every 5 minutes at peak and every 20 minutes off-peak, operating 4:30 a.m.–9:00 p.m. with on-call service to 2:00 a.m.; a separate 24/7 fleet of 4 to 8 larger shuttles would run every 15 minutes to the Amtrak station and both BART stations. The EIR must evaluate the potential added trips from this system — neighborhood parking and circulation, circling and illegal stopping, pedestrian/bicycle conflicts, idling emissions, noise, and interference with emergency access — including the consequences if the proposed plan led to insufficient off-site parking or shuttle capacity.

The EIR should evaluate alternatives to locating a shuttle depot within Hollis Green.

Relevant EIR issues: Transportation Safety, Emergency Access, Air Quality and Noise.

4. Hollis Green and publicly accessible open space

I recognize that the proposed new 25,850-square-foot park at the PDU site may provide a valuable public benefit. But the EIR should evaluate more than total square footage. Hollis Green would be reduced from approximately 29,600 to 22,100 square feet and partially converted to a transportation function, while other existing open space would also be reconfigured.

The EIR should compare the location, usable recreation area, accessibility, safety, amenities, noise and air-quality environment, and timing of the existing and proposed spaces. It should also analyze whether the replacement park will be completed and usable before existing open space is displaced and whether shuttle movements can safely coexist with park users.

Relevant EIR issues: Recreation, Transportation Safety, Air Quality and Noise.

5. Construction over the approximately ten-year buildout

A project expected to build out over approximately ten years, including about 71 months of hospital construction, could have substantial effects on surrounding neighborhoods. Those effects should not be obscured by annual averages.

The EIR should evaluate individual and overlapping construction phases and identify expected truck and haul routes, worker trips and parking, staging, street/sidewalk/bicycle-route disruptions, noise, vibration, dust, diesel emissions, contaminated-soil handling and emergency-access effects. Analysis should include peak construction conditions at nearby homes, parks, schools and childcare facilities and along affected routes in both Emeryville and North Oakland.

Relevant EIR issues: Air Quality, Noise and Vibration, Transportation Safety, Emergency Access, and Hazards/Hazardous Materials.

6. Helipad and 24-hour hospital operations

A 24-hour hospital is fundamentally different from the office/technology uses contemplated under the existing planning framework. The EIR must examine the physical consequences of continuous operation,

including nighttime employee and visitor trips, emergency vehicles, deliveries, lighting, mechanical equipment and shuttle activity.

The proposed helipad deserves particular attention. The NOP describes the helipad, located at a height of 301 feet, as handling approximately one round-trip flight per day, including nighttime hours. The EIR should clarify whether this figure represents a firm operational cap or only a planning baseline, and should disclose reasonably foreseeable maximum activity rather than an average, along with flight paths and aircraft types. It should evaluate effects at nearby residences, schools, childcare facilities and parks, including individual nighttime noise events rather than relying only on average daily noise measures.

Relevant EIR issues: Noise, Air Quality, Transportation and Sensitive-Receptor Exposure.

7. Contaminated soil, groundwater and hazardous materials

The NOP identifies existing and former cleanup sites, residual contamination, risk-management plans and land-use restrictions on portions of the project property. Of particular concern: the parcel proposed for the hospital itself (1400 53rd Street) is an open Cleanup Program Site under long-term management for petroleum hydrocarbons and silver, and the garage the project would retain as its primary parking facility (4563 Horton Street) is likewise an open, long-term-management site for TCE, PCE, 1,2,3-trichloropropane, arsenic, benzene, lead and naphthalene — both under recorded land use covenants. Given that a hospital houses medically vulnerable patients, the EIR should address whether these open cases would be resolved before hospital occupancy, what interim protections apply during construction, and — given the depth and duration of construction contemplated — the exposure risks from excavation, demolition, dewatering, soil stockpiling, hauling, vapor intrusion and accidental releases.

The analysis should identify how known contamination relates to the proposed hospital, medical-office, residential and park uses, and evaluate exposure pathways for workers, nearby residents and other sensitive populations.

Relevant EIR issues: Hazards and Hazardous Materials and Air Quality.

8. Cumulative effects, North Oakland and Berkeley

Environmental analysis should not stop at the Emeryville city limit. The EIR should establish an appropriate geographic study area for each impact and examine reasonably foreseeable traffic, transportation safety, emergency-access, construction, air-quality and noise effects on adjacent North Oakland neighborhoods.

The study area should extend into Berkeley as well. The project is expected to generate substantial shuttle and vehicle traffic between the Emeryville campus and Alta Bates Ashby Hospital, adding stress to Ashby Avenue (State Route 13) and Adeline Street, which feed directly into the Stanford Avenue/Powell Street corridor described above. While some Berkeley intersections are already in the transportation scope, the EIR should confirm they receive the same full VISSIM operations analysis, collision-history review and level-of-service evaluation as Emeryville intersections — not just traffic counts. Given this cross-jurisdictional traffic pattern, the City should ensure Berkeley's planning department can participate in the EIR process as a responsible or trustee agency, or at minimum as a commenting agency with direct knowledge of these corridors.

The EIR should also consider how Sutter's project could combine with other nearby development and transportation projects affecting the same streets, intersections and sensitive receptors.

Relevant EIR issues: Cumulative Impacts, Transportation, Air Quality, Noise and Emergency Access.

9. Reasonable alternatives—including a no-hospital alternative

This is particularly important to me.

Because Emeryville's existing planning framework does not currently provide for the hospital use Sutter proposes, the EIR should not treat amendment of that framework as inevitable. In addition to the CEQA-required No Project Alternative, the EIR should meaningfully evaluate an alternative in which the City retains its existing land-use framework and does not amend the General Plan and PUD/PDP to permit Sutter's proposed hospital on this site. It should also evaluate alternatives that substantially reduce the project's height and intensity, transportation and parking demand, and effects on Hollis Green and surrounding neighborhoods.

The question before Emeryville is not only how Sutter's proposed hospital can be modified or mitigated to permit it, but whether this site should be converted to hospital use at all. This is not an abstract land-use question: Item 1 documents an unresolved history of traffic fatalities and infrastructure gaps on one of the vulnerable corridors this project would burden with new shuttle and vehicle traffic. The EIR's alternatives analysis should weigh that safety record directly. The EIR should give the City Council and the public the information necessary to compare those choices fairly.

Mitigation and accountability

Where the EIR identifies significant environmental effects, I ask that mitigation be concrete and enforceable rather than aspirational — identifying who is responsible for implementation, when it must occur, measurable standards for success, monitoring and reporting requirements, and corrective actions if standards are not met. For transportation-related mitigation in particular, the City should consider enforceable measures addressing routing, traffic diversion, curb and loading management, pedestrian and bicycle safety, emergency access, shuttle operations and construction traffic where the analysis demonstrates they are necessary.

Conclusion

Sutter's recent revisions—including the 133-unit residential variant, new PDU-site park and protected Horton Street bicycle facilities—should be evaluated on their merits, but they do not change the fundamental scale or 24-hour nature of the proposed hospital, nor substitute for examining the environmental consequences of the overall project and reasonable alternatives to it.

Before making such consequential and potentially irreversible decisions, Emeryville should have clear answers to three questions: Should it change its planning framework to permit a hospital here at all? If not, what would continued development under the existing framework look like? And if a hospital alternative is considered, how much smaller and less impactful could it be? The EIR should give residents and decision-makers the information needed to answer them.

Please include these comments in the administrative record for the project and notify me when the Draft EIR becomes available for public review.

Thank you for considering my comments.

Sincerely,

Linda S. Henderson, Ph.D.
5514 Doyle Street, Unit 11
Emeryville, CA 94608
lindashenderson@gmail.com

Appendix 1



Sutter Health shuttle bus (marked "Emery Yards / Alta Bates"), photographed by the author on August 26, 2026 at approximately 3:11 p.m. on Stanford Avenue, on the route from Berkeley through North Oakland into Emeryville, as referenced in Item 1 above.

On Aug 27, 2026, at 8:49 AM, Miroo Desai <mdesai@emeryville.org> wrote:

Hi Hillari,

I have received your email below. For some reason the two pictures are not coming through at my end. Maybe you can resend them or alternatively give me a hard copy which I can scan and put it in the record.

<Outlook-jesmlbrj>

Miroo Desai (she/her), AICP
Planning Manager, City of Emeryville
1333 Park Avenue, Emeryville, CA 94608-3517
510-596-3785 (direct)
mdesai@emeryville.org

From: Hillari Allen <mamasanh@yahoo.com>
Sent: Wednesday, August 26, 2026 7:28 PM
To: Miroo Desai <mdesai@emeryville.org>
Subject: Comments on the scope of the Environmental Impact Report for the Sutter Emeryville Medical Center Project

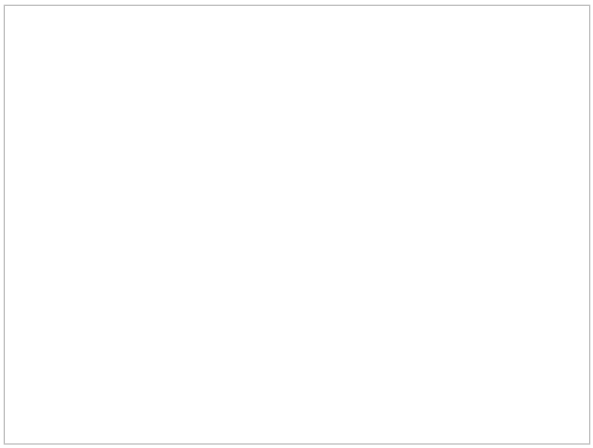
Dear Ms. Desai:

I submit the following comments on the scope and content of the Environmental Impact Report (EIR) for the Sutter Emeryville Medical Center Project. My concerns focus on foreseeable physical effects on transportation safety and emergency access on the assumed thoroughfare of 53rd Street

Issue: Safety Incompatibility of Traffic Diverted to 53rd Street

Location: 1124 53rd Street (in front of home)

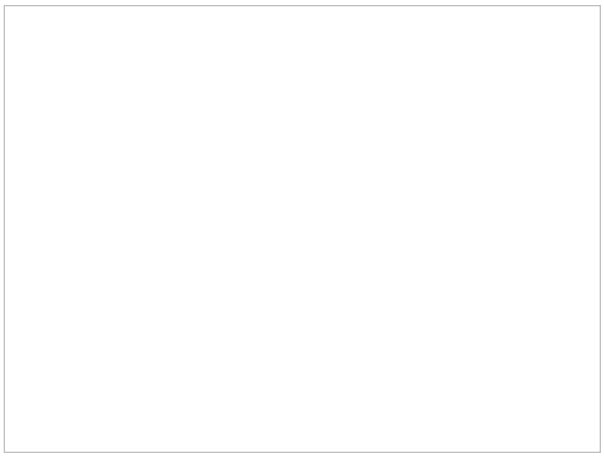
Captured: April 2026



SEE PICTURES AT THE END

*Typical pick-up traffic from K-12 School

Date Captured August 26, 2026



*This vehicle is parked blocking 2 residential driveways (and has red curb and No Parking indicated).

Description of the issue: Child Drop-off to and Pickup from Emeryville School and Daycare are already a hazard with double-parked parked cars and cars parked illegally, across driveways (already a serious problem).

Legal Relevance under CEQA: This documentation provides substantial evidence of a severe structural bottleneck in the existing baseline grid that the Lead Agency's environmental analysis must address under CEQA Appendix G, Section XVII, Questions (a) & (c). Additionally, it demonstrates how local infrastructure has been intentionally modified by the City through multiple plans and programs to restrict rapid vehicle circulation in favor of multi-modal safety.1,2

Request: The EIR must explicitly evaluate how the addition of the projected 1,500–1,800 peak-hour hospital vehicle trips can legally or physically reconcile with diverting high-volume vehicle flow through a 1 lane residential street (considered as “thoroughfare”) with 2 schools (1 daycare, 1 K-12).

The EIR must consider the K-12 school drop-off and pickup site mitigation.

The EIR must also explicitly evaluate how the estimated residential parking needs be mitigated.

Hillari Allen
1122-1124 53rd Street
Emeryville Neighbors United

"You can break down a woman temporarily but a real woman will always pick up the pieces, rebuild herself and come back even stronger than ever!" Julia Roberts (and I'm sure she wasn't the 1st to say it)


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"A formal education will make you a living; self-education will make you a fortune" - Jim Rohn

Outlook

Sutter Hospital Medical Center EIR Scoping Comment

From j raines <jeliserk@gmail.com>
Date Sun 9/13/2026 10:52 PM
To Miroo Desai <mdesai@emeryville.org>

I'm very concerned about this project and its impacts on our neighborhood, which include pollution, traffic, safety, inappropriate placement of a large hospital in a residential area that includes many rent-controlled units, noise, and lack of transparency from Sutter.

Pollution:

- The soil on the site is known to be polluted, so during construction prevailing winds will be carrying toxic dust that nearby residents will be breathing for how many years? Not everyone has air conditioning. So is there a sufficiently comprehensive way to prevent our air from being laden with toxic waste particles? If so, will Sutter request and pay for it, and if they do, how thoroughly will construction workers be in executing it? Not everyone has air conditioning, and in these neighbourhoods, even most of those who do also spend time out side gardening, barbecuing, jogging, cycling, walking dogs, birding, etc. One resident who spoke on this topic called us “outdoors people.”

Traffic:

- With 1,000s more personal vehicles, trucks, & construction equipment traversing nearby neighbourhoods for 12 years, what’s to keep semites off 53rd or Stanford? (One had been seen and photographed on 53rd that very day.)
- Sutter estimates 20,000 additional vehicle trips will be coming and going daily, with only 5% of those coming from the west, so maybe 75-85% of them traveling through Oakland. Inevitably some of those will be cutting through on Marshall, Vallejo and other side streets - bayward from San Pablo both 53rd St. and Stanford Ave are 1-lane, & 54th, 55th, 56th, Aileen & 57th are not through streets. (So why have Emeryville City councilors been dismissive when Oakland residents raise these concerns?)

Safety:

- How will increased traffic impact children, elders and bicyclists who need to cross streets? Is there a way to ensure that this project doesn’t jeopardize safety for students, staff, and parents going to the Child Development Center, Anna Yates School (K-8th) and Emeryville High School along 53rd (between San Pablo and Hollis), or for the those of the Escuela Internationale Bilingue (K-8th), the Happa Baby School (on Doyle), and the unusually large population of elders who live west of San Pablo on both sides of Stanford Ave.?

Site Suitability for a Major Medical Center :

- With limited access roads & potential flooding, can this Medical Center serve us in major disasters? The Hayward fault is 18 years overdue for a major quake.
- Sutter's MC site is barely above sea level and we all know that when there's a lot of rain this whole area shows it's nature to be a flood plain. Moreover, in human memory submarines were lifted out of the water for repairs near Horton and Stanford ave. So, if the Medical Center buildings begin to sink or lean (like the residential tower in SF), who will pay for for shoring them up? Potential relevant notes: Apparently submarines once docked near Horton and Stanford and according to a property resident, a well that's about a block east (by the compass) of Stanford and San Pablo overflows "all the time" so ground water is not

Social equity concerns:

- The surrounding neighbourhoods include many rent-controlled duplexes and apartments housing long-term residents who, if their environment fills with noise, toxic dust, and/or more car exhaust, even if their health suffers, cannot afford to move.

Noise:

- Emergency Room services and a helipad suggest that helicopters and ambulances with sirens will be coming and going at all hours, frightening small children and waking everyone with difficulty sleeping (a common problem for elders).

Transparency:

- Sutter is non-profit so there's no tax incentive that could help Emeryville address their $10 million deficit. Some neighbours have expressed concern that Sutter may be inclined to offer or Emeryville may request something that's not inclusive (of e.g., Oakland residents) or is not up front?

I humbly request this not move forward,

JE Raines
978 Arlington Ave, 94608
jeliserk@gmail.com

September 13, 2026

To: Miroo Desai, Planning Manager
City of Emeryville, Planning Division
1333 Park Avenue, Emeryville, CA 94608
Via Email: mdesai@emeryville.org

Subject: Notice of Preparation (NOP) Scoping Comments - Sutter Health Emeryville Medical Center (5300 Chiron Way)

Dear Ms. Desai,

My name is Jeff Fontas. I am a resident of Emeryville on 53rd Street. I am also a member of a local residents coalition called Emeryville Neighbors United, which is determined to represent Emeryville residents' voice as the City considers Sutter Health's Emeryville Medical Center proposal. Because Emeryville and its continued livability matter deeply to myself, my family, and our community, I submit the following scoping comments regarding the Environmental Impact Report (EIR) for the proposed Sutter Health Medical Center.

I. Summary of Facts & Environmental Context

The proposed project represents a massive intensification of land use proposed atop one of Emeryville's most heavily contaminated brownfield assemblages. The following established facts dictate the necessity of the scoping requests below:

- **Extreme Structural Mass:** The combination of a 330-foot building height and acute-care hospital usage, which requires heavy lead-lined imaging rooms, massive mechanical equipment, and strict structural requirements to avoid vibration during surgeries, results in an extremely heavy building.

- **Geology, Structural Mass, & The Millennium Tower Precedent:** Bedrock at this site sits between 400 and 1,000 feet below the surface (Geomatrix Consultants / 1995 Chiron EIR, Section III.L). Under the *American Society of Civil Engineers (ASCE 7-22)* standards, the hospital will likely be >30% heavier than a residential building of equivalent size, and exert severe downward foundation soil pressure (likely greater than 3,000+ psf). Because it will be built on soft Bay Mud, the hospital will require substantial support in the form of deep (100 ft+) friction piles to avoid catastrophic settlement similar to what occurred at the Millennium Tower in San Francisco. However, unlike the Millennium Tower, which was eventually stabilized by driving new piles down to bedrock, there is no bedrock failsafe available at the Emeryville site to resolve a settlement failure.

- **Seismic & Liquefaction Hazards:** The historical 1995 EIR geotechnical study concluded that the liquefaction risk at the site was "low." However, modern United States Geological Survey (USGS) classification designates artificial fill over Bay Mud in this area as having a "Very High" to "High" liquefaction susceptibility. Furthermore, the

California Geological Survey (CGS) 2003 Oakland West Quadrangle map officially designates this parcel as a mandatory "Liquefaction Zone of Required Investigation."

- **Subsurface Hazards & Historical Contamination:** The proposed hospital site previously operated as a Shell chemistry R&D laboratory researching petrochemicals (1954-1969). The proposed residential workforce tower is located on former PG&E property with documented PCB contamination. Historical reports indicate that contamination from the PG&E site also extends onto a section of the hospital site (the "Ramp Area"). Overall, the hospital site contains documented residual concentrations of TCE, PCBs, TEPH, and arsenic (2026 HHRA, p. 7; 2011 EKI Work Plan Part 1, p. 5). Additionally, shallow groundwater at the site occurs at 6 to 17 feet below the surface (1995 Chiron EIR Sec. III.M, p. III.M.5). The May 5, 2026 Human Health Risk Assessment (HHRA, pp. 11, 14) calculated an Incremental Lifetime Cancer Risk (ILCR) of 2.6E-04 and a Hazard Index (HI) of 2.2. The ILCR of 2.6E-04 is 260 times greater than the standard residential screening baseline of 1.0E-04, and the HI of 2.2 is more than double the threshold of 1.0 (DTSC Preliminary Endangerment Assessment Guidance Manual, 2015, Sec. 2.5.4.6, p. 77). The PDU is adjacent to the former Rifkin property, which had a documented history of petroleum contamination (RWQCB LUST Case No. 01-1240 / 2018 EKI Closure Request). The Temescal Creek Culvert runs directly under 53rd St adjacent to the hospital and then under the PDU.

- **Sensitive Land Use Transition & Residential Restrictions:** Due to the historical contamination from PG&E and the tank farm, the hospital site and residential tower parcels are governed by recorded Land Use Covenants (LUCs) that prohibit residential and hospital use:

    - *Covenant and Environmental Restriction on Property, 1400 53rd Street* (Recorded 11-27-2018; APN 49-1041-71-3)
    - *Covenant and Environmental Restriction on Property, 5300 Chiron Way* (Recorded 11-27-2018; APN 49-1041-70-2)

  Both covenants share identical provisions restricting use (Article III, Section 3.1):

  > *"b. No residence for human habitation shall be permitted on the Burdened Property;*
  >
  > *c. No hospitals shall be permitted on the [Former Building M Tank Area of the] Burdened Property;"*

  Sutter is actively pursuing amendment of these LUCs with the RWQCB (GeoTracker ID T10000008349, correspondence dated June 15, 2026). Because DTSC HHRA guidelines dictate that the transition from a Commercial/Industrial exposure scenario to an Unrestricted/Sensitive Use scenario lowers the target risk threshold, and Sutter will

have to perform deep excavation at both sites to build the proposed structures, source zone removal of contaminants will potentially be required.

- **Cone of Depression Threats:** Pilings will potentially cross aquitards. The dewatering required for this excavation will potentially create a cone of depression that threatens to pull high levels of documented contamination in the surrounding area into the project site.

- **Central Utility Plant (CUP):** Hospital regulations (HCAI) require massive backup power infrastructure, introducing localized emissions and fire risks.

- **Proximity to the Emeryville Shellmound (Archaeological Hazards):** The sites' close proximity to the historic Temescal Creek corridor and the Bay Street site (where construction famously unearthed approximately 300 ancestral Ohlone burials from the Emeryville Shellmound) significantly elevates the risk of encountering unrecorded archaeological resources, establishing the immediate project area as a highly sensitive archaeological zone.

- **Proximity to Sensitive Receptors:** The project site is completely surrounded by sensitive residential neighborhoods, public parks, and critical child-serving institutions. Located within feet of the proposed construction zones are Anna Yates Elementary School, the Emeryville Child Development Center (ECDC), and the Emeryville Center of Community Life (ECCL) and its athletic fields, and businesses that serve young children along Spur Alley. This extreme proximity to children and vulnerable populations dramatically amplifies the severity of all localized air quality, hazardous material, and traffic impacts.

Therefore, it is imperative that the City establishes strict, cross-institutional oversight (Regional Water Quality Control Board, DTSC, BAAQMD) through modern Risk and Soil Management Plans (RMP/SMP) to ensure a project of this scale can be safely developed near sensitive populations.

II. CEQA Scoping Requests (Impacts & Mitigations)

We request the Draft EIR analyze the following impacts and mandate the specified mitigations under CEQA Guidelines Appendix G:

1. Foundation Engineering, Bedrock Failsafe, & Liquefaction

- **Requested Action:**

    - *No Deferred Analysis to HCAI:* To comply with CEQA's prohibition against deferred analysis, the Draft EIR cannot defer structural mass and foundation engineering parameters to post-entitlement HCAI building permits (which are exempt from local public review). The Draft EIR must explicitly disclose the

estimated structural dead load, total building mass, and maximum foundation soil pressure (psf) of the proposed acute-care hospital and residential workforce tower.

- *Piling Depth & Aquitard Puncture:* The EIR must use these exact mass metrics to publish the preliminary geotechnical mitigation plan, specifically the maximum depth of the required friction piles for the hospital and residential tower, so the public and regulatory agencies can accurately evaluate the potential for these piles to puncture the clay aquitards and drag shallow contamination into deeper aquifers. We need this information now, as the public, to make an informed decision.
- *Modern Liquefaction Analysis:* The Draft EIR cannot rely on the historical geotechnical studies that claimed liquefaction risk was "low." The EIR must explicitly analyze the site based on the modern USGS classification (which designates the area as having "Very High" to "High" liquefaction susceptibility) and the CGS 2003 Oakland West Quadrangle map (which officially designates the parcel as a mandatory "Liquefaction Zone of Required Investigation"). The EIR must mandate strict, modern geotechnical mitigation for a 330-foot acute-care hospital.

2. Comprehensive Excavation & Dewatering Plume Migration Modeling

- **Requested Action:**
  - *Evaluation of Full Excavation Depth:* The May 5, 2026, Human Health Risk Assessment (HHRA) for the hospital parcel defined an excavation depth of "up to 20 feet bgs" (p. 3). However, constructing a 330-foot acute-care hospital on Bay Mud structurally necessitates driving hundreds of friction piles deep underground. The Draft EIR must ensure its environmental analysis is based on the actual maximum depth of all proposed foundation elements including piles, rather than relying on the 20-foot estimate as mentioned in the recent HHRA. The EIR must ensure similar analyses performed on the workforce housing, shuttle stop, and public park are performed at actual the maximum depth of proposed foundation elements.
  - *Comprehensive Phase II Sampling (All Parcels):* The EIR must mandate comprehensive, updated Phase II soil and groundwater sampling across all project footprints (hospital, workforce housing tower, shuttle stop, and public park) and formally compare the new 2026 contaminant concentrations (e.g., PCBs, PAHs, TCE, arsenic) against modern DTSC and RWQCB Residential/Unrestricted Environmental Screening Levels (ESLs). Specifically:
    - *Deep-Aquifer Phase II Sampling:* Because historical reports (1995 Chiron EIR, Sec. III.F, pp. III.F.9-11) document a deep chlorinated solvent plume

(TCE/vinyl chloride) at 25-49 feet bgs on the adjoining South BGR property, the EIR must explicitly mandate that all new Phase II Environmental Site Assessments include deep soil and groundwater borings that match the maximum depth of the proposed friction piles. The EIR must mandate modern High-Resolution Site Characterization (HRSC) methodologies (e.g., Membrane Interface Probes) to locate sinking DNAPL plumes.

- *Systematic Grid-Based Sampling & Hot-Spot Delineation:* To prevent sampling bias, the EIR must mandate a "systematic grid-based sampling approach" (maximum 50-foot centers) across the entirety of the project footprints (hospital, tower, park, and shuttle stop). Furthermore, within documented historical contamination zones, specifically the Former Building M Tank Farm and the Ramp Area, the EIR must mandate high-density delineation sampling (e.g., 10-foot to 20-foot centers). The spatial resolution of these borings must be statistically sufficient (achieving a 95% Upper Confidence Limit) to guarantee that all localized toxic plumes are mapped to their exact edges before grading begins. Sampling results must be published in the Draft EIR.

- *Public Park & Shuttle Stop:* Sampling depths in these areas must be sufficiently deep to fully characterize historical contamination, ensuring that the soils disturbed during construction or through long-term degradation of the cap do not contain legacy toxins that could expose children or waiting transit passengers.

- *Plume Migration Modeling:* The EIR must publish a parcel-by-parcel analysis detailing the estimated volume of soil to be removed (in cubic yards) and groundwater to be extracted (in gallons). To prevent "dewatering plume migration," the EIR must mandate explicit, 3D hydrogeological groundwater flow and contaminant transport modeling. This analysis must be performed using industry-recognized standards (such as the USGS MODFLOW and MT3DMS software suites, in accordance with ASTM D5447 guidelines) to mathematically prove that pumping millions of gallons of groundwater will not drag the adjacent contamination and solvent plumes into the Sutter footprint or the Bay.

- *Contaminated Stormwater & Effluent Treatment:* The EIR must include a detailed onsite water treatment plan. This plan must explicitly encompass both groundwater dewatering effluent and all construction-phase stormwater runoff. Given the severe surface soil contamination, the EIR cannot rely on standard SWPPP best management practices (e.g., silt fences). It must mandate that all stormwater that contacts the excavated site is captured in Baker tanks, tested,

and actively treated onsite to meet strict RWQCB discharge limits before being released into the municipal storm sewer or Temescal Creek.

    - *Vapor Intrusion Mitigations (Main Hospital):* Given the documented presence of highly volatile chlorinated solvents (TCE, vinyl chloride) in the immediate area, the EIR must mandate permanent, active Vapor Intrusion Mitigation Systems (VIMS) engineered into the hospital's and workforce housing's foundations to prevent toxic soil vapor from migrating into acute-care patient wards or residences.

- **Justification:** As established by the environmental mitigations required for the UCSF Mission Bay Medical Center and the broader Mission Bay redevelopment (EIR SCH #1997092068), which was built on similarly contaminated Bay margin industrial land, massive dewatering requires strict plume migration analysis and containment protocols to protect both adjacent properties and the Bay.

3. Temescal Creek Conduit Vulnerability (Hydrology & Hazards)

- **Requested Action:**

    - *Conduit Structural Integrity:* The project proposes structures and a park over APN 49-1544-2 in addition to the hospital. The Temescal Creek Culvert (a major concrete-walled stormwater artery) runs directly beneath this parcel and under 53rd Street adjacent to the hospital site and the shuttle stop. The EIR must analyze the structural risk of driving pilings and conducting massive soil displacement near this aging concrete conduit, modeling the catastrophic flooding risks if the conduit walls are compromised by foundation vibrations or construction activity.

4. Toxic Air Contaminants & Prevailing Winds (Air Quality)

Emeryville's prevailing winds blow west to east, risking the transport of toxic, airborne contaminated dust directly toward the Emeryville Child Development Center and the Emeryville Center of Community Life (ECCL).

- **Requested Action:**

    - *Dust Control Mitigations:* The EIR must mandate comprehensive dust-control mitigations, including negative-pressure enclosure tents or continuous vapor-suppressant foam (e.g., Rusmar) on all open trenches and active stockpiles.

    - *Construction Track-Out Controls:* To prevent the spread of contaminated mud into the neighborhood, the EIR must mandate strict track-out controls, including

stabilized construction entrances (rumble grates) and mandatory wheel washing stations for all heavy trucks exiting the site onto public streets.

    - *Real-Time Perimeter Air Monitoring:* We explicitly request the EIR mandate Real-Time Perimeter Air Monitoring Plans for PM2.5, PM10, and volatile organics. This monitoring data must be publicly accessible via a real-time dashboard, coupled with automatic, legally binding work-stoppage triggers if toxic thresholds are exceeded near sensitive receptors.

- **Justification:** As established by the environmental incidents and subsequent mitigations during the Hunters Point Shipyard / Candlestick Point grading (EIR SCH #2007082168) and the Brooklyn Basin brownfield redevelopment, standard visual dust inspections are insufficient to protect communities from legacy brownfield toxins. Stringent, real-time monitoring and strict containment protocols are required to protect adjacent sensitive receptors.

5. Helicopter Noise & Lead Exposure (Noise & Hazards)

- **Requested Action:**

    - *Airborne Lead Exposure Modeling:* The EIR must disclose the anticipated helicopter flight paths and fuel types. If the helicopters utilize 100LL (low-lead) aviation fuel, the EIR must model the airborne lead exposure risk to adjacent sensitive receptors.

    - *Helicopter Noise Contours:* The EIR must produce detailed decibel (dBA) noise contours explicitly analyzing the loudness experienced, and for what duration, at Bay Street, The Emery, Emery Bay Village, and surrounding residential homes during takeoffs and landings.

6. Transportation Feasibility, Safety Modeling, & Cumulative Effects

It is imperative that the feasibility of this project is understood from a transport and safety point of view.

- **Requested Action:**

    - *Injury Modeling & Patient Access:* The EIR must model and predict the statistical risk of pedestrian and cyclist injury (or death) caused by the addition of thousands of daily vehicle trips during both the construction and operational phases. It must explicitly evaluate the safety risks to civilians, local children, and vulnerable patients accessing the hospital.

    - *Construction Haul Routes:* The EIR must publish construction vehicle pathing (haul routes) for all excavation phases across all project sites. To protect the Anna Yates Elementary School zone, ECDC, and surrounding residential

neighborhoods, the Draft EIR must establish a binding Mitigation Measure prohibiting heavy construction traffic and soil-hauling trucks from traveling down 53rd Street.

- *School Zone Safety:* The analysis must evaluate the conflict between emergency hospital and construction traffic and the daily school pick-up and drop-off routines at Anna Yates Elementary and the Emeryville Child Development Center (ECDC) along 53rd Street. As shown in the below photograph taken September 3, 2026 at 3:02 PM, current baseline conditions during the 3:00 PM school pick-up already feature severe double-parking that extends west down 53rd Street to the Boyer Street intersection. I have personally observed motorists accelerate in the opposing lane of traffic to bypass the double parked vehicles, risking collision with children crossing the street to vehicles parked on the opposite side of 53rd Street. The EIR must explicitly model how the influx of thousands of hospital vehicle trips will safely navigate this existing, highly congested school zone.



- *Parking Deficit Overflow & Emergency Access:* The project proposes a massive 585-spot parking deficit. The EIR must model the safety impacts of this parking overflow onto 53rd Street and surrounding residential blocks. Specifically, the EIR must analyze whether the resulting traffic friction, double-parking, and

neighborhood congestion will impede Emergency Vehicle Access (EVA) for ambulances and block vulnerable patients from accessing the facility.

- *Bicycle Boulevards:* Stanford Avenue (between Hollis and Powell), 53rd Street, and 45th Street are all designated bicycle boulevards. The EIR must evaluate these specific corridors and identify if they will violate the National Association of City Transportation Officials (NACTO) maximum threshold of 3,000 Average Daily Traffic (ADT) vehicles due to project traffic and parking overflow.
- *Cumulative Impacts:* Layer the project's traffic data onto the pile-on effects of the proposed 40th Street Multimodal Project and the Alameda County San Pablo Avenue Corridor Project, which will divert regional traffic into neighborhood streets.
- *Horton Diverter Alternative:* Include a formal Traffic Variant / Project Alternative in which Sutter acquires or leases the Grifols parking garage (Building 12A). This alternative will minimize the need to route traffic down Horton Street, thereby preserving the Horton Street diverter which critically blocks cut-through traffic from spilling onto 53rd Street and Stanford Avenue.
- *53rd Street Diverter Variant:* As introduced during the City Council study session, I explicitly support and demand the EIR formally analyze a project variant that installs a traffic diverter on 53rd Street. The EIR must model how this diverter would successfully block project-generated cut-through traffic, insulate the Anna Yates Elementary School zone, and preserve the safety of the 53rd Street bicycle boulevard.

7. Residential Tower Vulnerability & Source Zone Removal (Hazards & Human Health)

Sutter proposes a 100+ foot workforce residential tower at Stanford Avenue and Hollis Street (APN 49-1558-5), which sits squarely on the historic PG&E Materials Distribution Facility. This parcel is documented to contain PCBs, coal tar (PAHs), and petroleum down to 9+ feet (see 1995 Chiron EIR, Section III.F, pp. III.F.5-6). Because construction of a 100+ foot tower requires a deep mat foundation that pierces far beyond the historic 2-foot deed-restricted cap, the transition to sensitive residential use potentially triggers mandatory source zone removal under DTSC guidelines.

- **Requested Action:**
  - *Source Zone Removal Plan:* If residential ESL thresholds are exceeded, the Draft EIR must evaluate the full environmental, health, and air quality impacts of complete source zone removal of all impacted soils. The EIR cannot defer this cleanup to post-entitlement remediation or rely on legacy capping. Any removal

operations must be subject to the real-time air monitoring and automatic work-stoppage protocols demanded in Section 4.

- *Vapor Intrusion Mitigations:* The EIR must mandate permanent, active Vapor Intrusion Mitigation Systems (VIMS) and independent 24/7 perimeter air monitoring to protect adjacent bike boulevards and pedestrian corridors during all excavation and operational phases.

8. Hollis Green Shuttle Stop & Cap Integrity (Hazards & Human Health)

The project proposes a transit shuttle stop at "Hollis Green" (APN 49-1041-29-1, south of 53rd Street at Hollis). This parcel is part of the historic PG&E Materials Distribution Facility. Due to documented historical contamination, the parcel is governed by strict land use restrictions that prohibit excavation beyond 2 feet to prevent exposure (see 2018 Risk Management Plan Update, GeoTracker ID T10000008349, p. 2).

- **Requested Action:**
  - *Land Use Restriction Violation & Excavation Risks:* The EIR must explicitly evaluate the human health hazards of excavating 2-4 feet to construct the shuttle stop foundations, roadbed, and infrastructure, in excess of the 2-foot deed-restricted cap.
  - *Source Zone Removal:* The EIR must formally determine whether this change in planned use, extended exposure duration, and required excavation triggers mandatory source zone removal beneath the Hollis Green parcel, rather than simply relying on paving over it. If source zone removal is required, the EIR must apply the stringent real-time air monitoring and dust suppression protocols demanded in Section 4.
  - *Vapor Intrusion Mitigations:* If any enclosed structures (e.g., waiting rooms, attendant kiosks) are constructed on the transit pad, the EIR must mandate active Vapor Intrusion Mitigation Systems (VIMS) to protect occupants from the underlying volatile toxins.

9. Central Utility Plant (CUP) Thermal Runaway Hazards (Air Quality & Hazards)

To comply with emergency power mandates, the project requires a Central Utility Plant housing industrial-scale backup generators. Routine testing will subject adjacent residents to severe diesel particulate matter (PM2.5) emissions.

- **Requested Action:**

- *Diesel Emissions* & *BESS Integration:* The EIR must evaluate the feasibility of minimizing diesel runtime by integrating a Battery Energy Storage System (BESS).
- *Thermal Runaway Mitigation:* To mitigate catastrophic thermal runaway and fire risks in a dense, seismically vulnerable area, the EIR must evaluate and mandate the use of advanced, non-flammable battery chemistries, specifically Sodium-ion (Na-ion) / Sodium Iron Phosphate technology.

10. Tribal Cultural Resources & Archaeological Sensitivity (AB 52)

Because the project footprint sits adjacent to the historic Temescal Creek corridor and just a few hundred feet from the site of the massive Emeryville Shellmound burials (as established above), driving hundreds of deep pilings and excavating deep mat foundations carries an extreme risk of subsurface cultural disturbance.

- **Requested Action:**
  - *AB 52 Compliance & Monitoring:* The Draft EIR must explicitly evaluate impacts to Tribal Cultural Resources in compliance with AB 52.
  - *Work-Stoppage Protocols:* The EIR must mandate full-time, independent Native American and archaeological monitoring during all grading, piling, and excavation activities. Furthermore, it must establish a strict, legally binding work-stoppage and consultation protocol in the event that Ohlone burials or cultural artifacts are encountered.

11. Tower Massing: Wind Shear & Shadow Impacts (Aesthetics & Recreation)

In a coastal environment with high prevailing winds off the Bay, structures of the extreme height and massing proposed for the residential tower and hospital create severe microclimate disruptions.

- **Requested Action:**
  - *Pedestrian-Level Wind Study:* The EIR must mandate a formal, physical Pedestrian-Level Wind Study to mathematically analyze whether the "Venturi effect" created by the towers will generate dangerous wind shear for pedestrians, cyclists, and seniors navigating the 53rd Street, Horton Street, Hollis Street, Stanford Avenue, and Chiron Way corridors.
  - *Shadow Analysis:* The EIR must include a comprehensive Shadow Analysis to determine if the 330-foot tower will cast significant, persistent shadows over the adjacent Anna Yates Elementary playgrounds, the proposed new public park, and existing residential solar arrays.

12. CEQA Project Alternatives

To mitigate the severe, unavoidable impacts associated with constructing a 330-foot acute-care hospital on this highly constrained, contaminated parcel, CEQA requires the Draft EIR to evaluate a reasonable range of project alternatives.

- **Requested Action:**
    - *Reduced Height / Reduced Mass Alternative:* The EIR must rigorously evaluate a "Reduced Height Alternative" (e.g., capping the hospital at a significantly lower height). This analysis must specifically model how reducing the height of the building could mitigate contamination risks due to its weight, e.g. the depth at which friction piles must be driven into soil and risks of spreading subterranean solvents deeper into groundwater. Additionally, the EIR must analyze how a Reduced Height Alternative would proportionately reduce the project-generated traffic impacts and neighborhood microclimate (wind shear/shadow) disruptions.
    - *Alternative Location:* The EIR must evaluate an "Alternative Location" (such as the parcel at 5801 Christie Avenue) that places this massive, Risk Category IV essential facility on a site that is adjacent to multi-lane thoroughfares and a major freeway (thereby mitigating residential neighborhood traffic impacts) and has significantly less proximity to sensitive receptors and residential areas.

III. Conclusion & Request for Clarity

The unprecedented scale, structural mass, and 24/7 operational intensity of a 330-foot acute-care hospital necessitates absolute clarity on the full depth and extent of excavation, as well as the ongoing environmental, transportation, and community safety risks associated with the project's construction and long-term use. In addition to the public and City, other agencies like the HCAI and RWQCB will rely on the information in the EIR as the agencies consider amendments to LUCs and issuing of building permits.

Based on the precedents of similar complex Bay Area projects, the CEQA process requires a rigorous, modern analysis. As established in *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192, "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR."

By providing these specific geotechnical, environmental, and safety parameters now, the City can ensure the Draft EIR is fully protective of the Emeryville community.

Sincerely,

Jeff Fontas

Outlook

Emeryville Sutter NOP Comment submission

From Jeff A. Johnson <pegasusgiraffe@gmail.com>
Date Mon 9/14/2026 5:01 PM
To Miroo Desai <mdesai@emeryville.org>

September 14, 2026

To: Miroo Desai, Planning Manager
City of Emeryville, Planning Division
1333 Park Avenue, Emeryville, CA 94608
email: mdesai@emeryville.org

Subject: Notice of Preparation (NOP) Scoping Comments - Sutter Health Emeryville Medical Center project

Dear Ms. Desai,

My name is Jeff A. Johnson. I am a 20-year Emeryville resident on 62nd Street, near Doyle Street. As an active participant in Emeryville Neighbors United—a citizens group dedicated to sustainability, livability, and community wellbeing—I am writing to express my strong opposition to the proposed Sutter Health Medical Center project on 53rd Street and to submit my scoping comments for the Environmental Impact Report (EIR).

My primary concern centers on the severe traffic and circulation impacts expected both during the construction phase and throughout long-term operation. The selected site at 53rd Street and Horton is entirely unsuitable for a project of this scale. Located several blocks away from main thoroughfares, the facility will force high volumes of private vehicles, paratransit vans, and emergency services onto narrow residential streets and through designated school zones. Emergency response vehicles operating at necessarily excessive speeds present a risk in these neighborhood zones.

In the construction period, there will be a continuous parade of large trucks and heavy construction equipment, on a daily Basis. This will bring high congestion, and an increase in noise and pollution. This will continue for years.

In recent years, the City Council has respectfully listened to residents and has implemented key green initiatives across the city. This progress is particularly evident along the Hollis-Horton corridor, where protected bike lanes and traffic-calming measures have reduced pollution and created a safer environment for families. Placing a 17-story medical tower and auxiliary buildings in this location directly undermines these achievements and sets back decades of General Plan decisions shaped by resident input, and make Emeryville a far less desirable place to live, particularly for young familes.

This is a flawed and impudent project, and I hope the EIR findings truly expose how untenable this proposal is.

regards,

Jeff A. Johnson

1275 62nd Street

Emeryville

Outlook

Sutter Health Construction - Neighbor Letter

From Jennifer Mayfield <jennifermayfield11@gmail.com>
Date Tue 9/15/2026 10:57 AM
To Miroo Desai <mdesai@emeryville.org>

Hello,

I am very concerned about increased traffic and especially truck traffic in the neighborhood due to the Sutter Health Project. Will there be construction vehicles, cement trucks? semis? on Stanford? It was not built to be a major thoroughfare, let alone to accommodate this kind of construction traffic. I have experience in public infrastructure traffic plans. There is a lot to consider and the neighborhood will bear a great deal of significant change due to construction traffic and later hospital-related traffic due to pedestrian safety, dust, noise and

I live on Marshall street North of Stanford. I cross Stanford at the neighborhood crosswalk east of San Pablo at Marshall and Stanford frequently. Was this stat measured in your initial traffic study? For me, in the past it could be 6-8x a day due to dog walking, and visiting friends and neighbors. For example I have a regularly scheduled walk with an 80 year old friend on the southside. I take my dog for a visit and we walk in the neighborhood. Sometimes we cross back to visit my garden and that is already 6 crossings.

I am also concerned about trucks making shortcuts through the neighborhood on 59th and small streets like Marshall. My partner who lives 3 blocks away in Emeryville and I have walked between each other's homes a minimum of 2x each a day, as many as 10x for over 4 years now. The walk is pleasant and still has a neighborhood feel. However, our little urban neighborhood is very urban already. Please consider pedestrians, the neighborhood vibe and our traffic safety and preserve it. I would advocate for preserving 59th as a pedestrian corridor and directing traffic to 40th and Ashby to Hollis for access.

Trucks also bring dust and stir their own tire dust (I wipe my kitchen counters multiple times daily before using them when the windows are open) from San Pablo. That is a choice I have made and live with. I do not want more tire and other dust affecting my health that was not a choice by me and my neighbors. The added dust for pets, children and people with compromised health is important to take into consideration. My next door neighbors are in their 80's, I have had lifelong asthma and it is more challenging to manage lately.

Please ensure the EIR fully evaluates these impacts and includes clear, enforceable measures to protect pedestrian safety, neighborhood streets, noise and air quality. This project should not erode the safety, walkability, and neighborhood feel that we neighbors value.

Thank you for your consideration.

Kind regards,
Jennifer

Jennifer Mayfield, MPA
510 847-9744

Outlook

NOP Comments RE: Sutter Hospital

From John Amador <jonnycat9@yahoo.com>
Date Mon 9/14/2026 12:19 PM
To Miroo Desai <mdesai@emeryville.org>

Dear Ms. Desai:

I know you are getting plenty of comments regarding the Sutter project, but wanted to add mine as well, even if others already have addressed them.

First- Analyze traffic on 53rd. Primarily along the school site, but also west and east all the way to Telegraph. During all times, but epically during school drop off, pick up as well as after school program times, which are also often a concern. The street is already experiencing traffic that is way beyond capacity at times. This is very dangerous and even without Sutter, and is all but certain to result in a tragic outcome for the life and well being of a child or someone else. The amount of people crossing in an unsafe manner is already critically dangerous. The school/ ECCL configuration was vary poorly designed and they seem to be operating way beyond what is allowed by the Conditions Of Use that were part of their approval process. I.E. (not supposed to have any drop of/pick up, deliveries, or parking on the north side of 53rd at all that is related to the school). Despite some half hearted attempts at managing the situation, these have been short lived and essentially ineffective. Thus the School and the City are in a sense guilty of Willful Negligence for allowing it to continue. How will Emeryville and Sutter address these concerns ? Since the border between the 2 cities goes down the middle of the street, there seems to be real problems with enforcement. Where Emeryville is unable or unwilling to take responsibility for the problems they are creating, . Leaving those of us on the Oakland side of the street (I live across from the Anna Yates gate), feeling powerless in our ability to deal with the mess because it is not in part of Oakland, and getting inadequate help from the School or EPD related to the invisible border that goes down the middle street in front of our houses.
These concerns could be addressed by sustained ticketing cars that are blocking driveways, which would force the parents to circle around and use the south side of the street. This would cut down on the kids crossing through 3 lanes of traffic (while often not even looking towards oncoming cars), which has become the norm. Adding traffic from Sutter is just pouring fuel on the fire and increases the odds of tragedy for a child (or parent) even further. This is a VERY CRITICAL CONCERN.

Possible Mitigations:
Please seriously consider reconfiguring the layout and closing the 53rd gate altogether. Consolidating all the pick up/drop off areas into the one currently in use on the 47th street side of the campus, which is generally not used as a thoroughfare. In addition, relocating the teacher parking off of San Pablo, would allow access to the campus all along that block and the ability to enter the campus through the multiple gates on that stretch, thus "flatting the curve" for parents to use for short-term parking, which really gets concentrated into such a small area now that it is an Urgent Safety Concern. Any worries of Jay Walking on San Pablo could be addressed by installing a waist high barrier along the median, thus forcing the people crossing to go to the crosswalks, where there are lights and often crossing guards. Another mitigation that might help reduce the currant baseline. Opening 47th street east of San Pablo back up to through traffic. This was closed off a few years ago, forcing all the traffic that would be using that part of the street onto surrounding streets thus compounding the problem.

Or better yet, moving Anna Yates to a better more suitable location which would lower the existing baseline substantially. My understanding is that Teachers and staff find the situation there very frustrating and this

results in higher teacher turnover and some positions having to be filled with inexperienced staff at times.

Knowledgeable folks familiar with Education have told me that the whole idea of combining all 3 schools on one Campus was a ridiculous idea and never should have been done that way.
While this is a dangerous and chaotic situation for the neighbors and school, nearby schools have had to close due to low enrollment and other problems. Santa Fe, which is just 2 blocks away closed in 2012, and is currently used for administrative offices, and a transition program, and Golden Gate closed long before that. It was replaced with a Charter school, but that has now closed and that site seems to be vacant. Thus since apparently half of EUSD's students are from out of district, they are in a sense partially responsible for school closures in the areas that they come from.

Moving the school would make the traffic related to Sutter have less of an impact at critical times and might even save a kids life. I know Sutter has mentioned that they were considering requiring Ambulances and Shuttles to use other routes to the proposed Hospital during certain hours, I find that completely inadequate.

My reasoning is that those types of vehicles are driven by "Professionals" so have a somewhat better chance of operating their vehicles in a safe manner. My real concern is with "Amateur Ambulances". These would be Stressed Out family members, Care Givers, or even Uber drivers who may or may not even be familiar with the area. Perhaps relying on GPS for directions, yet they could be driving in a Critical Emergency Situation because someone with them is having a Serious Health emergency and they might not want to risk the cost of an ambulance ride if they are not certain it would be covered by their health insurance if they are lucky enough to have it or if they do, what the deductible might turn out to be.
This is potentially a lot more dangerous then an Ambulance with all its flashing lights and siren to warn people along the way. All mitigation options must consider the reality of how people behave who are not professionals, yet may be driving as fast as possible without full attention towards the kids or whatever else they may encounter along the way.

Attached, you will see a couple of Images of the chaos along 53rd st, as well as some links to some photo albums I posted previously. While the albums are not as currant, they are very representative of the conditions that we are experiencing to this day.

My next concern is Parking. Sutter states that they don't have enough on site parking spots and are relying on shuttles. While they can encourage patents and staff to not drive there, how will that be enforced? Turning the surrounding area to a permit parking zone would help,but it will not eliminate the problem and could also be hard for the neighbors to deal with. My understanding is that the permits come with restrictions that might make it hard for everyone to qualify or if they have more then one vehicle, and also make it tricky to have people visit who don't have a permit. Permit areas also usually have a 2 hour window before they take effect. Therefore anyone who expects their visit at Sutter to take less time then that, thus would be able to park anywhere without consequence. I know that as a Sutter patient myself, I avoid their parking lot if I'm going in for something that I know won't take that long, both at the Berkeley and Oakland locations.
I'm also concerned about enforcement. Is Oakland having to provide someone to patrol the Oakland side of the effected streets ? Who pays for that ? Oakland already can't afford to provide enough services for stuff that would be of a higher priority over something like residential parking permit enforcement. I therefore think that Sutter MUST be required to provide additional onsite Free parking to ALL staff and visitors. The added stress on existing residents is unhealthy for our mental health. Even employees who are part of the shuttle program might not like being far from their car if they need to wait to get to it at the end of their shift when they are anxious to get home. What will be done in excess of what has already been offered to address these concerns ?

Next, I am disappointed to hear about the removal of the Park on 53rd and Hollis.
It's my understanding that was a mitigation by Chiron to build what they were eventually allowed to build. Otherwise Chiron wouldn't have been allowed to get approval.. It seems to me that if The Hollis Green Park is to be reduced in size or turned into a less hospitable place to disconnect from stress, feel connected to ones surroundings and find inner peace. That should then disqualify what has already been built or approved

for that area. A Bus Depot is no substitute for a Park. These facets relating to the importance of the park, are hard to quantify, yet really do effect the health and well being of the community. Please don't allow this to happen. We need more Parks, not less.

There are so many more environmental health and safety issues related to the addition of a hospital, however I will focus on these things for now.

Thank You
Sincerely- John Amador
1114 53rd street (39 year resident)

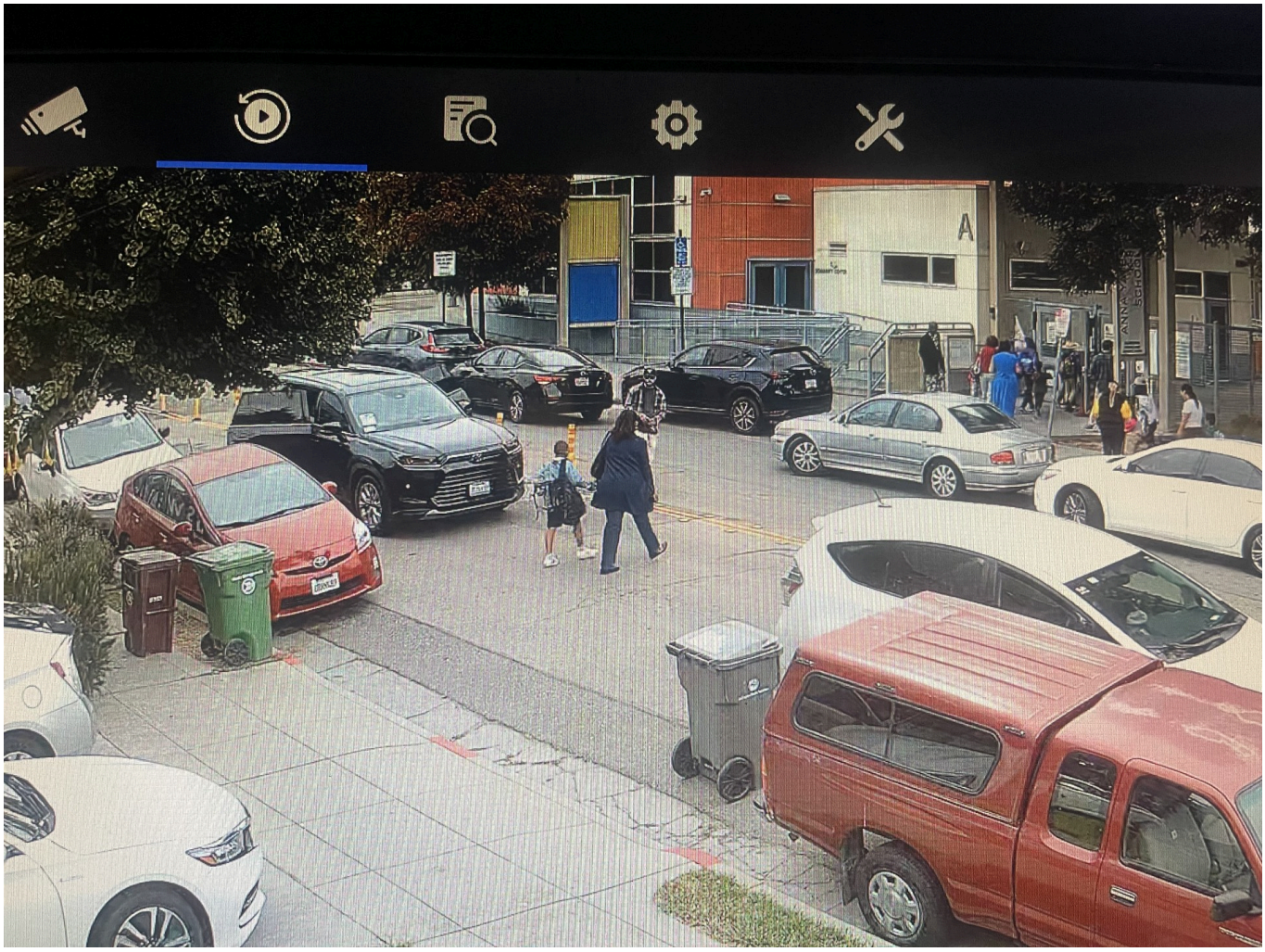
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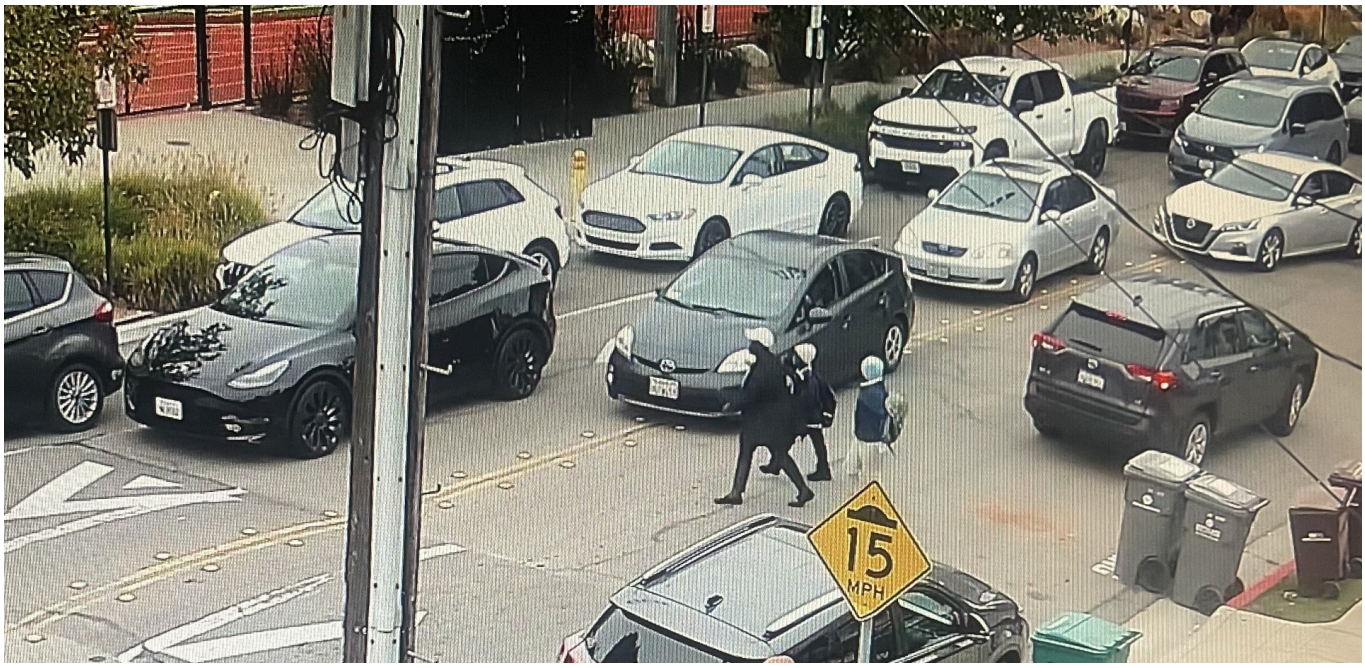
Outlook

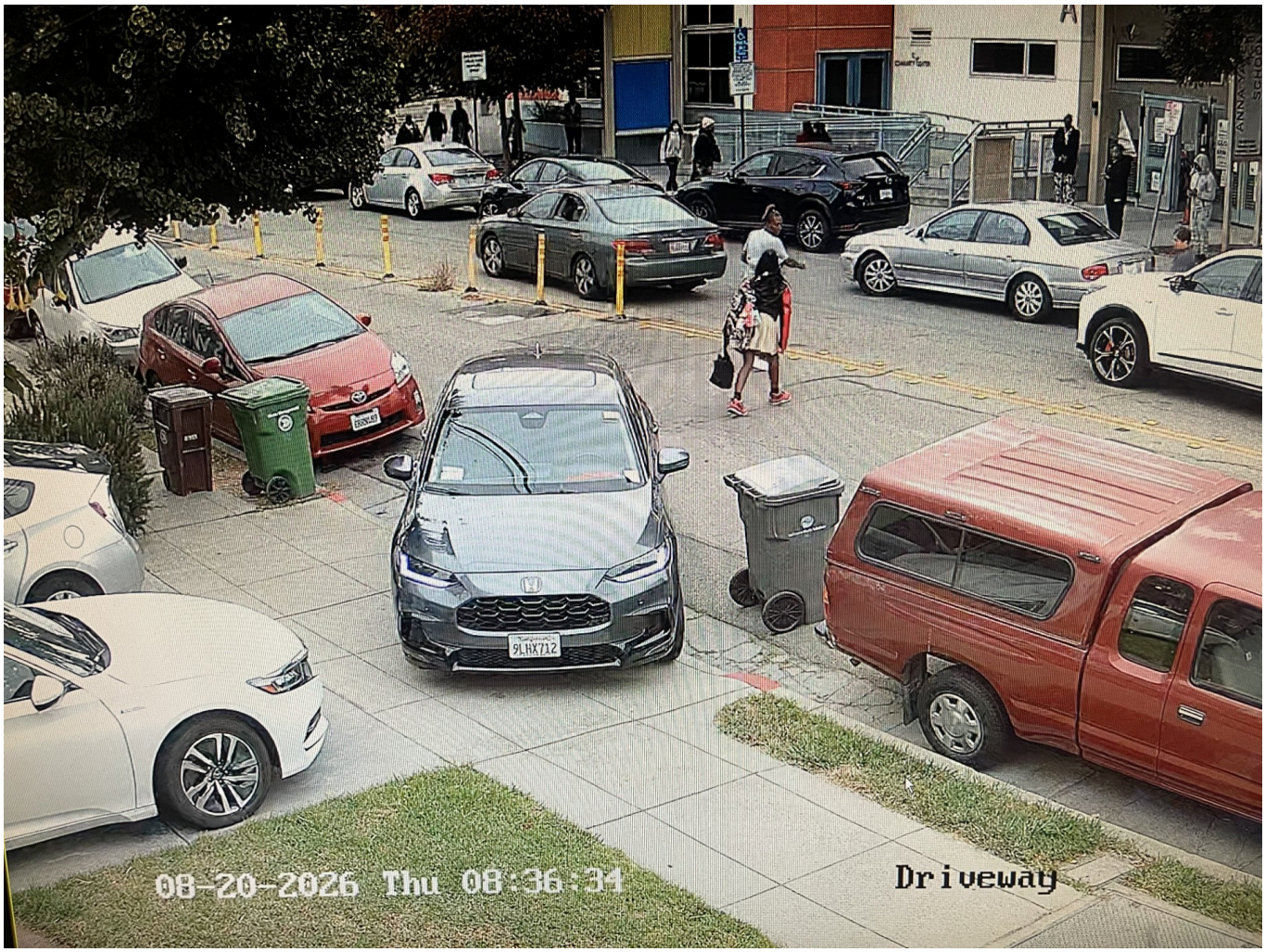
Addendum to previous NOP comment

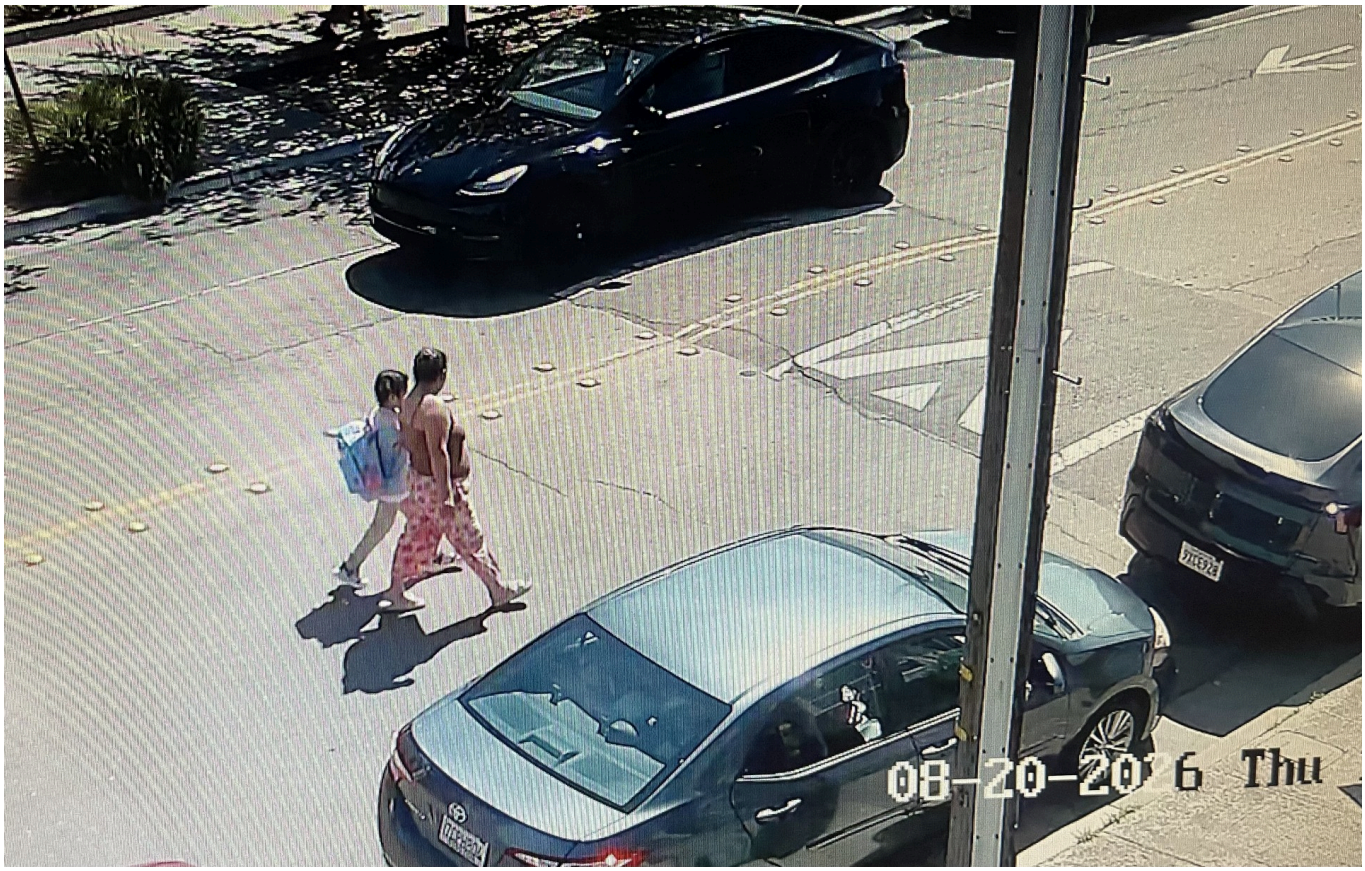
From John Amador <jonnycat9@yahoo.com>
Date Mon 9/14/2026 12:58 PM
To Miroo Desai <mdesai@emeryville.org>

Dear Ms. Desai,
The email I sent earlier didn't seem to attach these properly. Hopefully this will work
Thanks- John Amador




15
MPH


9LHX712
08-20-2026 Thu 08:36:31
Driveway





Sent from Yahoo Mail for iPhone

Outlook

Sutter Health EIR additional comment - alternative project

From jordan wax <eville.jordan@gmail.com>
Date Tue 9/15/2026 4:24 PM
To Miroo Desai <mdesai@emeryville.org>

Hi Miroo,

Here is my additional comment clarifying the alternative project I discussed at the scoping meeting. I have decided to eschew graphics in favor of written narrative.

...

The applicant's proposal requests major permanent changes to our city plan and promises impacts entirely out of proportion with what has been planned not only for the land in question, but any land in the city. This outsize intensity is reflected in the constraints the applicant has shown in delivering mitigation through the project.

The alternative I propose maintains the full scope of the proposal, including the ambulatory care center, while making space for a broad spectrum of such opportunities. The major mitigating features of this alternative that will need evaluated are the expansion of terrace space by thousands of square feet, the addition of creekside park space, the diversion of major rush hour traffic from the Horton/53rd grid quadrant, the maintained blocking of Horton through-traffic, the addition of childcare and gym facilities, and the addition of 500-600 units of employee housing.

This requires mostly reconciling the original overlay under which the applicant's current parking capacity was built. In this scenario, Grifols would retain their major lab and the rights to the parking spaces it requires, while the applicant would acquire from Grifols the rest of the overlay west of Horton and south of 53rd, including the garage in use.

In order to make full use of this land, the applicant would utilize a parking plan which does not require the removal of the diverter at Horton and 53rd. One possible scenario involves physician and ambulatory care parking in the north garage along with Grifols employees. Other A-shift employees would then park west of the tracks at Bay Street and possibly Ikea, both of whom have major daytime parking surpluses and are outside the neighborhood grid. Patients would use the main garage, as would evening and overnight workers.

With Horton remaining closed, the applicant can now stretch the base of their hospital across Horton and connect it to the north garage, creating drive-up parking for physicians and ambulatory care patients and space for the 55,000 sqft ambulatory care facilities within the hospital structure. The remaining land west of Horton can then be used for connections to the greenway at the ground and/or terrace level, and a Temescal Creek park space.

This folds the applicant's maximum proposed intensity into the base project and creates a surplus of design space for the hospital structure. Ideally, this surplus would be spent on design quality, with room for some combination of more terrace space, adjusted massing, smoother street level operations, and better neighborhood integration.

These are all opportunities for impact mitigation but cannot be properly measured without an informed series of design adjustments. In the meantime, the addition of terrace space from the mass being added crossing Horton will be the most predictable mitigation opportunity.

The MOB site no longer being needed for ambulatory care opens it to either the currently proposed housing project or new facility according to the applicant's needs. In the absence of input from the applicant, the impacts of the current options at the MOB site should be adequate stands-in.

What are the expected impacts of these changes so far? Spreading the project across more land brings it closer to the planned intensity of this district. Additionally, breaking rush hour traffic into quadrants to avoid removing the diverter at Horton is a major step in aligning this project with the city's guiding documents. These changes also secure land for a Temescal park space and what adaptation/restoration project may fit, with a wide range of possible mitigating benefits.

The applicant also benefits, with an acceleration and possible broadening of operations through the integration of the ambulatory care facility into the hospital building. Physicians would enjoy secure drive-up parking and all employees could have a terrace connection to the greenway over a cooling creek park, accelerating them past the ground floor entrance toward recreation or their ride home.

These improvements to the project themselves could constitute a full alternative proposal, but they do little to address the apparent consensus biggest issues: overall traffic and public safety/quality of life. They may also not do enough to relieve rush hour traffic so Horton can confidently be permanently closed and built across.

In addition, Grifols' current surplus in their parking structure is paired with a surplus of redevelopable land south of 53rd. If that land is not included in a deal, Grifols will have to account for future parking demand, and the City will have to account for an increase in future rush hour traffic from the redevelopment, while having no timeframe for such a development to happen and the original overlay to finally be complete.

The simplest and highest-impact way to address these issues then is for the applicant to acquire this land and develop it themselves into parking-free employee housing. On such a large parcel, and with a unit mix appropriate for worker housing, such a project should comfortably produce in the range of 500-600 housing units even with a major childcare space and employee gym.

It should be noted that like the proposed hospital, this would require an amendment to the General Plan. And while it would take future traffic off the table, it would also represent a further decrease in future tax revenue, adding to the fiscal questions surrounding this project. Furthermore, even spreading this project's traffic impact across such a large additional parcel will likely leave it several times larger than the planned range.

With that said, a large employee housing project with a childcare center and gym may provide the greatest opportunities to mitigate impacts while delivering benefits in a heavy overlap with all involved

parties.

The project's expanded scope and newsworthy level of housing would bring additional prestige and reputation to the applicant while providing a powerful recruiting tool along with on-site childcare. The population in the regional housing market benefits from the domino effect of housing becoming available as employees move in. Employees who can successfully secure such housing will enjoy the full range of financial stability offered by affordable rent, affordable child care, no need for a car, and presumably good health care.

In addition, due to the shuttle connections between the applicant's facilities, an employee can take advantage of all these features whether they live at the housing, work at the facility, or both. With all the existing amenities around the overlay, this is a complete recipe for hundreds of car-free residents and hundreds more finding everything they need in Emeryville for either a car-free commute or at least one outside rush hour.

What are some mitigating impacts to measure for this alternative?

1) With a housing population drawn from a 24-hour employee base, what will be the eyes-on-the-street impact of such a development? To what degree might this additional round-the-clock population be expected to mitigate crime and nuisance in the neighborhood?

2) What would be the projected VMT impact of this housing development? What would be the rush hour traffic impact? What effects might we see on rush hour traffic from commuters who have childcare and gym access on site? What knock-on effects might we see in rush hour traffic from the resident presence of colleagues?

3) What would be the net impact on local child care demand?

4) What would be the net impact on local housing demand?

5) What would be the impact of these changes on greywater use throughout the complex?

6) What would be the impact of additional terrace and park space on local and migratory bird life and pollinators?

7) What would be the net impact on stormwater and wastewater?

8) What would be the difference in Horton through-traffic with the now-permanent nature of the diversion?

The desirability of this location for housing does not seem in question, but the applicant can do their own work verifying the realities of the local housing market and their employees' feelings on the subject. The question for the EIR is: assuming the housing fills, how much of the problems that this project brings can this alternative solve?

...

Thank you!

jordan wax (they/them) 510.345.9387
chair, City of Emeryville Planning Commission
member, City of Emeryville Parks & Rec Advisory Committee

FROM: JUDITH TIMMEL
jtimmel@gmail.com

CITY OF EMERYVILLE
CITY CLERK'S OFFICE
SEP 14 2026
RECEIVED

The proposed Sutter hospital tower that would occupy a tucked-away corner of Emeryville would have huge negative consequences for our city and no advantages that are apparent. Healthcare is available and abundant in our area.... we are minutes away from large healthcare facilities: Stanford facilities two blocks away, Kaiser Hospital 12 minutes away, another Sutter hospital 10 minutes away and Children's Hospital, equally convenient. The EIR will illustrate the un-mitigateable problems such a facility would impose upon our residents and workers.
I request that the following topics be addressed in the EIR for the proposed Sutter Hospital

CEQA Appendix G category:

LAND USE / PLANNING
According to the Emeryville General Plan (GP), the following statements are at the core of this document:

1. "The guiding principles at the heart of the General Plan... express a community vision for Emeryville's evolution from a center of commerce to a livable and diverse city."
2. " The plan focuses on enhancing livability and quality of life for the city's expanding population, fostering responsible, sustainable development, increasing connectivity, enhancing the public realm."
3. " Development intensities are designed to... provide transitions in scale and height to lower density neighborhoods."
4. " The city will interweave the future and the past, while respecting the scale, character and use of the historic Doyle and Triangle neighborhoods."

Please address these statements in light of the proposed
height of 330 feet, its use as a large 24-hour trauma center and hospital and its impact in the following areas:

1. Appropriateness of scale: the 330 foot height limit definitely dwarfs even the two highest buildings in the immediate proximity, 5300 Chiron Way and 5555 Hollis St. which are approximately 110 to an 120 feet tall. Across the street are one-story buildings and in the next blocks are mixed-use and residential neighborhoods of one and two stories. This would be the highest building in Emeryville in an area that, according to the General Plan, has a height limit of 100 ft.

Question: does this development fit into the guidelines of the GP of the scale of buildings appropriate for the Hollis and Doyle neighborhood?
Mitigations: do not allow a height variance and require the developer to adhere to the height limit of 100 ft. aoccording to the GP.

1.Appropriateness of use: the general plan clearly has in mind expanding and enhancing "livability", which to me means housing, parks, schools, walkable, bikable streets and small businesses and a quiet environment. It does not mean a regional 24 hour hospital drawing patients from tens of miles away featuring helicopters, ambulances and 20,000 car trips a day.

Question : how does a 24/7 trauma center and hospital fit into the livability factor expressed in the GP?

Mitigations: locate the hospital/ trauma center elsewhere and repurpose this lot for housing or medical use that is meant for local residents.

2.Respect for the character of the Doyle neighborhood: The current Doyle neighborhood, bounded by Doyle Street, 53rd St., Powell St., Stanford Street and San Pablo Ave, is characterized by one street of mixed-use development with a café (with street seating and numerous small businesses, along with low density housing and a preschool. It includes and four blocks (extending into Oakland) of single-family and low density housing and a park with a children's playground and dog run The proposed project will fundamentally alter the character of this neighborhood by increasing traffic and air pollution, creating noise and light pollution, interfering with a major bicycle boulevard and casting shadow over it. It will introduce a giant tower into a quiet residential/small business neighborhood.

Question: does this project fit into the definition created by the GP of sustainable, responsible development, focused on the quality of life and community character of the existing Doyle/Hollis neighborhood? (Below I list specific categories of hazards to study for this neighborhood.)

Mitigations: reduce the size of the building to a maximum of 100', thereby reducing the air and light pollution, shadow, noise and danger to children, pedestrian, bicyclists and pets and the residents of the Doyle/Hollis neighborhood.

AIR QUALITY

Traffic: analyze the air pollution effect of 20,000 car trips per day and approximately 100 shuttle per day as well as the up to 30% of additional traffic created by drivers circling the neighborhood searching for street parking on the air quality of the Doyle neighborhood, specifically: Happa Baby School, Stanford Park (See photo # 1), the residents and workers of the Doyle neighborhood (described above.)

1. Determine the percent of employees using the current Stanford shuttle system and apply that number to the planned usage. Determine how much additional car and shuttle pollution would be produced by low shuttle usage and by nearly empty shuttles, about 100 per day
2. Determine the additional air pollution caused by 10% of drivers circling the neighborhood searching for street parking within 4 blocks.

Mitigation: none.

TRANSPORTATION

Determine the increase in traffic on 55th St between San Pablo Ave. zand Doyle St and Doyle St between 55th St and Powell St. with or without the diverter being placed on 53rd St.

Current conditions: this corridor is used as a cutoff to avoid the busy intersection at Stanford and San Pablo. Doyle St is a very narrow street with parking on both sides (cars slow to about 5 mph when encountering an oncoming vehicle; see photo # 2) that is parked up every day during business hours and during cafe hours on the weekends from 8:30 to 2:00 pm; see photo # 3. Drivers search for parking and pedestrians cross the street to go to the cafe,

located across the street from the parking lot. Closing off 53rd St to car traffic, a necessary mitigation, would divert the East West traffic to 45th and 55th Sts and Doyle St. There is a corner at 55th and Doyle where there are no stop signs; cars frequently cross the double line as they take the turn faster than advisable. See photo # 4.

Mitigations: traffic must be decreased by decreasing the size of the building and changing its use to a less intense purpose.

NOISE

1. Construction noise: determine the level of noise during 6 years of construction and its effect on vulnerable populations (the elderly, the ill, young children (especially when playing outside), pets, etc. within a half mile radius.
2. Helicopter and ambulance noise: what is the decibel level, duration and frequency level of sirens and helicopter noise? What is the intensification of noise from a helicopter on those directly beneath it compared to the level experienced by someone 3 blocks away?

   Mitigation: exclude helicopters and ambulances from the site.
   Repurpose the usage to a less intense level of patient care.

HAZARDS

1. Light pollution: determine the intensity of light pollution within a half mile radius. Studies indicate that light from this size building would be from 3 to 30 times brighter than the light from a bright urban neighborhood. Considering that this currently a darker than average urban neighborhood and calculating the window coverage and intensity of lights, including rooftop lights, how much brighter would the immediate vicinity be (within 2 blocks and up to ½ mile away.)
   Determine the effect on sleep and well-being of individuals within this radius.

   Mitigations: reduce the size of the building and specify daytime use only. This would eliminate the need for hazard lighting and for helipad lights.

2. Shade: shade is hazardous to humans' health and well-being (see: Int J Environ Res Public Health article, July 2020, " Insufficient Sun Exposure Has Become a Real Public Health Problem,") and the viability of plants.

   Do a shade study extending up to the extent of the shadow cast by the building.

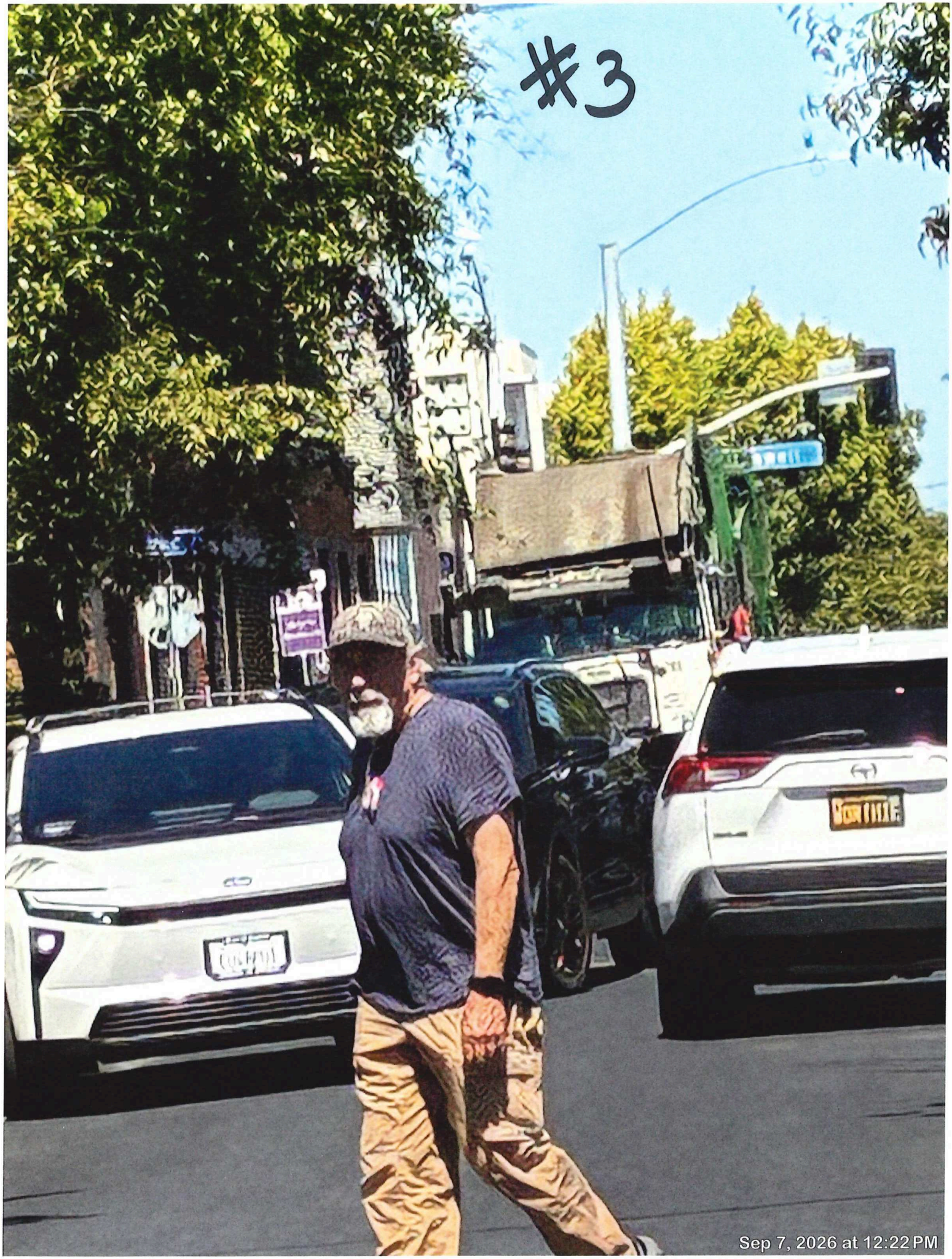
Question: how many community gardens and parks are affected by the shade of this building? How many school children?

Thank you for including these concerns in the EIR.

Respectfully submitted, Judith Timmel, 5514 Doyle St., Sept.12, 2026


#1
NO DOGS
8XFN085
Sep 11, 2026 at 1:06 PM


#2
5515 DOYLE ST.


#3
Sep 7, 2026 at 12:22 PM


#4
9ZG1973

Julie Bongers
1089 57th,
Oakland CA 94608
juliebongers@yahoo.com

Miroo Desai, AICP
Planning Manager, City of Emeryville
1333 Park Avenue
Emeryville, CA 94608
mdesai@emeryville.org

September 13, 2026

Re: Request for formal inclusion of the considerations, concerns, and questions in this document in the scope of the EIR for the Sutter Health's Medical Center Proposal for the Stanford Ave.to 53rd along Chiron in Emeryville

Dear Ms. Desai:
I am submitting this letter with my concerns, considerations, and questions to formally request you include them in the scope of the EIR for Sutter Health's proposed Emeryville Medical Center.

Please also take this email and its attachment to serve as a formal request that all of the concerns and questions submitted in the attachment, if they are even slightly relevant, be considered in addition in the project's non-CEQA analysis of transportation.

For a little context, I live on 57th street near San Pablo, this is my nineteen year in this location, and I mostly walk and use public transportation. When doing so, rather than focus on my phone, in accord with how I was raised, I tend to study the plant, animal (including human), insect and other life around me.
In preparing the EIR for Sutter's proposed Medical Center, I'm formally requesting that the City of Emeryville's planning manager consider and investigate these questions and considerations, implicit and explicit:

DURATION OF CONSTRUCTION:

- It's expected that ***construction on Sutter Health's Medical Center (MC) will begin in 2008 and continue for 12 years. Is that realistic?***

Julie Bongers
1089 57th,
Oakland CA 94608
juliebongers@yahoo.com

AIR QUALITY:

- ***The soil on the site is known to be polluted. There was a Shell Oil research centre and "chemical tank farm" on the hospital site. How will Sutter address that during construction, prevailing winds will be carrying inland to where we live and breathe an assortment of toxic particles*** in the construction dust. ***For how many years will we be breathing construction dust, what contaminants might it include and in what concentrations***? Please be thorough and honest in assessing this. I am sure that I am not the only nearby resident who does not have strong lungs, and lives without air-conditioning. Moreover, to control temperature in my southwest-facing rooms, I keep all my windows open all summer and some windows cracked or partially open all year round. I also spend significant time outdoors and walking through the neighbourhood.

TRANSPORTATION & TRAFFIC:

- ***With 1,000s more personal vehicles, trucks, & construction equipment traversing nearby neighbourhoods*** for what I expect will be at least 12 years, ***what's to keep semi-trucks off 53rd*** or Stanford? A semi was photographed on 53rd on Sept. 10, 2026.
- ***Sutter estimates 20,000 additional vehicle trips will be coming and going daily, with possibly as many as 95% of those traveling through Oakland***, (inevitably cutting through on parallel side streets that are bayward from San Pablo, just as I and other long term residents have been known to do).

SAFETY FOR VULNERABLE POPULATIONS:

- How will Sutter's projected traffic increases impact children, elders and bicyclists who need to cross streets?
- ***Is there a way to ensure that this project doesn't jeopardize safety*** *for* students, staff, and parents ***traveling to nearby schools***:
    - *Child Development Center (1220 53rd)*
    - *Happa Baby School (5521 Doyle)*
    - *Anna Yates School (K-8th at 1125 53rd)*
    - *Emery High School (1100 47th)*
    - *Escuela Internationale Bilingue (K-8th at 4550 San Pablo)*
    - *East Bay German International School (1070 41st)*
- ***Or to other immediately proximate public and private institutions:***
    - *Emeryville Center of Community Life (4727 San Pablo)*
    - *Sweat - Outdoor HIIT Gym (5351 San Pablo)*
    - *Golden Gate Library (5606 San Pablo)*
    - *Emeryville Senior Center (4321 Salem)…*

Julie Bongers
1089 57th,
Oakland CA 94608
juliebongers@yahoo.com

- ***Being one who moves through the nearby neighbourhoods at a slower pace because I walk, I've noticed that an unusually high population of elders*** live west of or very close to San Pablo on both sides of Stanford Ave.
- Likewise, in contrast to as recently as 2023, ***it rarely happens that I traverse*** my neighbourhood ***without passing someone pushing their child in a stroller or baby carriage. In sum, I've no doubt that the below three year old population of our neighbourhood has increased markedly since the pandemic.***

SEASONAL FLOODING AND A HIGH WATER TABLE:

- Is this site suitable for a major Medical Center? It is barely above sea level and I can clearly see from how plants grow on unirrigated properties that ground water levels in this neighbourhood are high. Moreover, ***whenever there's a big storm, I find myself stuck walking down the sidewalk through water or stepping over pipes carrying water that many people living bay-ward from Los Angeles St. have had to pump out of their basements and/or garages***. Likewise, when I need to cross Stanford at San Pablo during a major storm, I have to walk a block up Stanford to avoid wading through waters that are ankle-deep or higher. In that same vein, according to Don J, a resident of a property near 57th and San Pablo, their well overflows "all the time," and I've heard that submarines once docked for repairs at about Horton & Stanford.
-

RESPONSIBILITY AND LIABILITY:

- In the context of a high water table, if the MC buildings begin to sink or lean (like the residential tower in SF), I wonder who will pay for shoring them up? With narrow access roads, a high water table, & frequent seasonal flooding, ***how can this Medical Center serve us in a major disaster?*** The Hayward fault, responsible for the largest bay area quake (1868) since California statehood, and it is ~18 years overdue for a similar eruption**.**

NOISE:

- ***Emergency Room*** services and a helipad foretell that ***helicopters and ambulances with sirens will be coming and going at all hours, frightening small children and waking everyone with difficulty sleeping (a common problem for elders).***

SOCIAL EQUITY:

- The surrounding neighbourhoods include ***many rent-controlled duplexes and apartments housing long-term residents who, if their environment fills with noise, toxic dust, and/or more car exhaust, cannot afford to move. Are ALL nearby residents' health and quality of life needs being taken into account?***

Julie Bongers
1089 57th,
Oakland CA 94608
juliebongers@yahoo.com

TRANSPARENCY:

- Sutter is non-profit so there's no tax incentive for Emeryville to permit this MC. At the same time, Sutter has approached the SF Bay Water Board to exempt the site from an existing Land Use Covenant that precludes siting residences or hospitals there. Are they offering something to someone that's not up front?

Miroo Desai

Planning Manager

City of Emeryville

1333 Park Avenue

Emeryville, CA 94608

mdesai@emeryville.org

Date: 14th Sep, 2026

RE: Public Scoping Comments and Environmental Requests for Sutter Hospital Medical Center (PUD25-001)

To Ms. Desai:

I am writing to express concerns about the impacts of the Sutter Emeryville Medical Center on adjacent North Oakland neighborhoods. As a resident deeply impacted by the physical realities of this segment, I request that the Lead Agency thoroughly analyze the project's potential environmental and public safety impacts under the California Environmental Quality Act (CEQA) Guidelines Appendix G. **The specific area of concern - 53rd Street between San Pablo Avenue in Oakland and Boyer Street in Emeryville - is a uniquely dense, highly constrained residential corridor that cannot absorb increased traffic without significant environmental degradation.**

Existing Corridor Constraints (Baseline Conditions)

To ensure an accurate environmental baseline assessment under CEQA, the EIR must explicitly document and model the existing structural limitations of this specific block:

• **High-Density Residential Fabric:** This segment consists heavily of multi-unit residential structures, including duplexes, triplexes, and multi-family lots, creating a high concentration of sensitive human receptors.

• **Severe Off-Street Parking Deficit:** A substantial number of older homes on this block feature zero off-street parking infrastructure or lack driveways entirely. Crucially, multiple multi-unit properties depend entirely on a single-car driveway shared across separate independent households, making curbside parking a non-discretionary neighborhood necessity.

• **One-Sided Street Parking:** Legal curbside parking is physically limited to only one side of 53rd Street, heavily constraining the available parking supply. See Exhibit 1



Exhibit 1: No parking on one side of 53rd St in Oakland between San Pablo and Boyer St

• **The Anna Yates School Drop-Off Loop:** A traffic circle installed by the City of Emeryville to facilitate student pick-up and drop-off at Anna Yates Elementary School physically narrows the travel lane. The installation of this circle historically permanently eliminated critical curbside parking spaces previously utilized by Oakland residents. See Exhibit 2



Exhibit 2 – Traffic circle. Also shows red curb – no parking on that side of the street

Mandatory CEQA Appendix G Areas of Analysis

The environmental analysis must evaluate the compounding effects of project-generated traffic against these baseline conditions across the following specific categories:

1. **Transportation (Section XVII)**

Geometric Design Hazards (Question XVII-d): The EIR must evaluate whether adding vehicle volume to a street already severely narrowed by the Emeryville school loop creates geometric design hazards or incompatible uses. Increased volumes combined with parents looping through, vehicles backing out of shared driveways, and hospital traffic will increase collision risks.
Emergency Access (Question XVII-e): The EIR must simulate whether emergency vehicles (Oakland and Emeryville Fire/EMS) can safely navigate 53rd Street when the school loop is active and the single-sided parking is fully occupied. Any additional traffic or double-

parking caused by a lack of spaces could trigger catastrophic delays in emergency response times.

2. Noise and Vibration (Section XIII)

Permanent Ambient Noise Generation and Increase (Question XIII-a): Increased traffic volumes and localized idling will cause a permanent substantial increase in ambient noise levels. The EIR must measure the noise bouncing off tightly packed, multi-unit homes that sit close to the roadway and conduct acoustic modeling to evaluate the noise exposure

Construction Disruption (Question XIII-b): The EIR must include a ground borne vibration analysis assessing how heavy construction machinery will physically impact the structural integrity of older residential foundations on 53rd Street.

3. Air Quality (Section III)

Sensitive Receptors (Question III-c): The proximity of multi-family homes, school age children attending Anna Yates Elementary school, Emeryville Middle and High School and the presence of outdoor facilities (field, track and outdoor swimming pool) used by these children makes this an ultra-sensitive corridor. The outdoor field is also rented out during evenings and weekends for use by children and adults playing soccer and other field sports. The EIR must execute a localized Health Risk Assessment (HRA) to quantify exposure to localized diesel particulate matter (DPM) and particulate matter (PM2.5/PM10) from idling vehicles, construction equipment, and increased daily traffic.

Requested Mitigation Measures

To reduce these impacts to a less-than-significant level, I formally request that the Lead Agency evaluate and mandate a **Parking Capacity Replacement and Management Plan**. Suggested measures under this plan may include the following:

• **Multi-Unit Shared Driveway Accommodation:** Conduct a parcel-by-parcel audit of the corridor to catalog properties operating with a single-car driveway or zero off-street parking. For every street parking space removed or compromised by the project, an equivalent, dedicated off-street or protected curbside replacement space must be provided within 250 feet of the impacted parcel.

• **Cross-Jurisdictional Parking Offsets:** Coordinate an enforceable agreement between the City of Oakland, the City of Emeryville, and the school district. Emeryville must open designated, secure parking stalls within the Emeriville Elementary/High School lots - or nearby public facilities - for overnight and weekend use exclusively by permitted 53rd Street Oakland residents living in parking-deficient homes.

• **Targeted Residential Parking Permit (RPP) Allocation:** Establish an accelerated RPP zone for this block of 53rd Street. The program must explicitly prioritize permit allocations and provide subsidized parking passes for residents living in multi-unit configurations with shared or single-car driveways, ensuring non-residents cannot monopolize remaining curb space.

• **Infrastructure Optimization via Angled Conversion:** Prior to approving any street parking removal, OakDOT must evaluate the feasibility of converting remaining parallel parking spaces to high-density angled parking spaces along wider segments of the corridor to artificially increase the net stall count.

We walk here. We bike here. We shop here. We raise families here. We go to the Senior Centers here. This EIR must take into account the real, specific concerns of North Oakland residents.

Sincerely,

Karpura Kommineni

Karpura Kommineni

Address: 1176 53rd St Oakland

Email: karpurak@yahoo.com

Outlook

Comments EIR Sutter Emeryville Hospital

From Kathryn Webb <ktwb@sbcglobal.net>
Date Sat 9/12/2026 4:08 PM
To Miroo Desai <mdesai@emeryville.org>

Hello,

My comment about the EIR for the proposed Sutter hospital in Emeryville is that the local Oakland traffic should also be considered. This is an Emeryville project, but it will seriously affect where I live in Oakland at Vallejo and 62nd Street. I have been to two meetings and from what I hear, Sutter is not planning to consider the traffic impacts on anywhere but Emeryville. There needs to be a regional traffic study to understand the larger impact.

Thank you, Kathryn Webb

Outlook

Scoping comments on Sutter EIR

From Laura McCamy <lmccamy9@gmail.com>
Date Mon 9/7/2026 5:00 PM
To Miroo Desai <mdesai@emeryville.org>

Dear Ms. Desai,

Below are my comments on the environmental impact scoping for the proposed Sutter hospital building on 53rd Street.

Transportation/Traffic

Motor vehicle traffic:

- Add the following segments to the traffic study:
    - 55th Street from San Pablo to Doyle
    - Doyle Street from 55th to Powell
    - Stanford from Horton to Powell
    - San Pablo from Stanford to Ashby
- Assess the impacts of this project on the 40th Street multimodal redesign.
- Assess the increase in hazards, particularly to vulnerable road users, at high-risk intersections, including:
    - Entrance to Target parking lot on 40th Street
    - 40th and San Pablo
- Assess additional traffic delays to Emery-Go-Round and AC Transit bus services through Emeryville. Include all AC Transit routes that serve Emeryville.
- What other changes is the project likely to need because of traffic backups, need for quick access, and increased vehicular traffic? Would Emeryville need to widen nearby streets, which are specifically narrowed for traffic calming, to accommodate the traffic generated by this project?

Bicycle and pedestrian traffic:

- Assess the impacts on regional bicycle connectivity through the Horton Street corridor. Include bicycle commute/travel routes commonly used by residents of Oakland, Berkeley, and beyond.
- Assess the impacts on planned future bicycle and pedestrian infrastructure, including the San Pablo Avenue redesign.
- Study how the additional vehicular traffic will affect access to the bicycle/pedestrian bridge to Bay Street, particularly from east side neighborhoods.
- Study how the additional vehicular traffic will affect bicycle/pedestrian access to Huichin Park.
- Assess Emeryville's ability to execute its Active Transportation Plan and construct future facilities for people walking and biking, given the additional traffic and traffic patterns generated by this project.
- Assess the increased risk of traffic-related injury or death for vulnerable road users: people biking and walking, especially seniors and children.

Traffic diverters:

- How would the removal of the diverter at 53rd and Horton affect bicycle safety on Horton Street from 40th Street north?
- How would the addition of a diverter on 53rd Street east of Hollis affect traffic on 55th and Doyle Streets west of San Pablo?

Parking:

- What sorts of overflow parking can be expected on residential streets, since there's no street parking on the streets directly adjacent to the project?
- Study parking impacts on all neighborhood streets between San Pablo and the project site from Ocean to 40th.
- Specific streets that need in-depth street parking assessment:
    - 53rd from Hollis to San Pablo
    - 54th from San Pablo to dead end
    - Doyle Street from 55th to 59th

Noise

The proposed project will increase noise pollution in the neighborhood exponentially. It's critical to accurately assess the health and safety impacts of traffic noise, helicopter noise and

percussive impact, and emergency vehicle sirens.

Please include the following specific populations in your assessment:

- Residents of the neighborhoods surrounding the project, including but not limited to Bay Street, the Emery, Park on Powell, the Icon, and Doyle Street Cohousing.
- Children at the Happa Baby daycare center at Doyle and Stanford, including their ability to play outdoors.
- Park users at the parks on Stanford, Huichin Park, and Doyle Hollis Park
- Swimmers at the ECCL pool
- Track and field users, including K-12 students, at ECCL's outdoor facilities
- Outdoor diners at the Doyle Street Café on Doyle and 55th, Bay Street Food Court, and other nearby restaurants
- Outdoor events at Bay Street
- Shoppers at Emeryville's malls, particularly Bay Street

Land Use/Planning

Emeryville has zones dedicated to high-traffic uses that draw regional visitors, specifically in its shopping malls. It also has areas designated for commercial or mixed commercial/residential use. The Chiron PUD footprint was designated for research/office use and the neighborhood that developed around it was built on the expectation of extra traffic during commute times on weekdays, not traffic to a public-facing facility that never closes.

- How would the proposed Sutter Hospital change the character of the neighborhood
    - During construction
    - 5 years after opening
    - 15 years after opening
- Does the Sutter project qualify for a PUD variance? Should it be considered a completely different land use that must negotiate with the city from the ground up, rather than relying on the existing PUD conditions for some of its structures?
    - The proposed use is wholly different from that contained in the PUD. It's a complete change, not a difference by degree.

- One of the conditions of approval in the original PUD was the park at 53rd and Hollis, which Sutter proposes to turn into a shuttle stop.
- The hospital 50% taller than the maximum height under the PUD and 3x taller than the existing buildings within the borders of the PUD.

Geology/hydrology

- What is the earthquake hazard for this site?
- How will the weight of a 330-foot building impact earthquake risk?
- How will the weight of the building with the additional weight of a helicopter impact earthquake risk?
- What is the risk to the structural integrity of the underlying geology of the site, which is bordered by an embankment leading down to the train tracks?
- How will the project affect Temescal Creek, which runs under it?
- How will the project affect the daylighted portions of Temescal Creek, which provide wildlife habitat?
- How will the project impact flood risks on the surrounding streets? Doyle Street at the foot of 55th already routinely floods during heavy rains due to runoff from higher elevations. Will this project lead to more flooded streets?

Biological resources

The project site is less than a mile from a tidal marsh that is being gradually restored and is home to large numbers of migratory birds, particularly in winter.

How will light from the hospital, including ambient light from occupied floors, mandatory aircraft warning lights, and light on the helicopter landing pad and from landing helicopters affect migratory birds?

Population/housing

The proposed hospital will tower over surrounding buildings, casting shade during the day and light at night.

Lightshed:

- What is the lightshed of the proposed facility? Include:
    - Ambient light from occupied floors
    - Aircraft warning lights
    - Helipad lighting
    - Helicopter lights
- Quantify the increase in nighttime light from this facility.
- Assess the health impacts of the lack of darkness on people living within the lightshed, using research on negative health outcomes due to excessive light at night.

Shadow:

- What homes will be affected by the shadow from this building during each season?
- How will the project's shadow affect heating costs for residents in winter?
- How will the project's shadow impact the ability of surrounding buildings, both residential and commercial, to install solar panels? Will the building block so much of the crucial afternoon sun that it forecloses the option to go solar for detached homes to the east of the project?

Mitigations

I believe the no-build option will be an important element in this EIR, and I hope that will be described thoroughly and carefully.

While I believe the siting of a hospital in this neighborhood cannot be mitigated, I suggest the following as potential mitigations:

- Reduce the size of the facility to below 200" and remove the helipad.
- Site medical offices but not a 24-hour emergency room in a small building on the site.

Thank you for your consideration.

Laura McCamy
Freelance Writer and Editor

415-626-7821
lmccamy9@gmail.com
(she/her)

Outlook

Supplemental NOP Scoping Comments – Sutter Health Emeryville Medical Center (5300 Chiron Way)

From Linda S. Henderson <lindashenderson@gmail.com>
Date Sat 9/12/2026 4:16 PM
To Miroo Desai <mdesai@emeryville.org>

Miroo Desai, AICP
Planning Manager
City of Emeryville, CA

Dear Ms. Desai,

I am writing to submit supplemental comments regarding the scope of the Environmental Impact Report for the proposed Sutter Health Emeryville Medical Center at 5300 Chiron Way and its associated development.

I have reviewed the detailed NOP scoping comments submitted by Emeryville resident Jeff Fontas. I strongly support his request that the EIR fully investigate the environmental, geotechnical, hazardous-materials, groundwater, air-quality, transportation, and public-safety issues identified in his submission.

I live approximately 0.6 miles from the proposed construction site. My condominium faces directly west, toward the Bay and the project area, in the path of the prevailing west-to-east air flow. My concerns are therefore not only about the individual environmental impacts of this proposal, but also about how those impacts may interact with one another and compound environmental conditions that nearby residents already experience.

Unintended, Interactive, and Cumulative Consequences

I urge the EIR to look beyond each environmental issue in isolation and examine the potential interaction among the project's construction requirements, the site's geology, groundwater and historical contamination, prevailing winds, existing freeway-related pollution and noise, and Emeryville's constrained local transportation network.

A project of this scale could involve years of excavation, foundation work, dewatering, heavy construction, truck traffic, dust, vibration, and noise, followed by the permanent traffic, emergency activity, mechanical systems, helicopter activity, and other impacts associated with a major 24-hour hospital.

The EIR should consider whether these impacts could interact with and amplify one another in ways that may not be apparent when each is studied separately. It should also examine the cumulative burden created when new project impacts are added to existing environmental conditions in the surrounding community.

In this regard, I strongly support Mr. Fontas's request for a rigorous, current analysis of the site's geology, liquefaction and settlement risks, groundwater, historical contamination, excavation, dewatering, and foundation requirements. I am not independently asserting what the engineering or environmental conclusions will be; rather, I believe the conditions he identifies raise serious questions about potential consequences that should be fully investigated and answered in the EIR before project approval.

Multi-Year Construction Noise and Vibration

I am deeply concerned about the noise and vibration associated with a multi-year construction project of this magnitude.

The EIR should disclose the anticipated duration of each major construction phase and realistically evaluate the noise and vibration generated by excavation, foundation installation, drilling, heavy equipment, truck movements, backup alarms, and other construction activities. Those impacts should be evaluated at surrounding residences as well as at nearby schools and childcare facilities.

This area already experiences substantial background noise from I-80 and the Maze. The EIR should evaluate construction noise in the context of this existing noise environment and consider whether adding years of major construction activity could create an excessive cumulative noise burden for nearby residents.

The EIR should also identify meaningful and enforceable limits on construction hours, noise and vibration levels, nighttime and weekend activity, and particularly disruptive construction operations.

Air Quality and the Existing Pollution Burden

Air quality is not an abstract concern for me. I already observe dark residue accumulating on plants outside my condominium, which I believe may be associated with nearby freeway traffic. I currently operate two air purifiers inside my home.

Because my condominium faces west toward the Bay and the project area, I am particularly concerned about additional particulate matter, contaminated dust, diesel exhaust, volatile compounds, and other emissions that could be generated during years of excavation, soil handling, hauling, and construction.

The EIR should evaluate these construction emissions in the context of the pollution burden nearby residents already experience from I-80 and other transportation sources. Construction-generated pollution should not be evaluated as though it were being introduced into an otherwise clean-air environment.

I strongly support Mr. Fontas's requests concerning stringent control and monitoring of construction-related air pollution. I also ask that the EIR consider whether monitoring beyond the immediate project boundary is necessary to determine how construction emissions could travel through surrounding residential areas under prevailing wind conditions.

Traffic and Risks to Children, Pedestrians, and Bicyclists

I am also extremely concerned about the volume of additional traffic that could be concentrated within Emeryville's small and constrained local street network.

The impacts would occur in two stages: first from years of construction vehicles, soil-hauling trucks, equipment deliveries, and construction workers, and then permanently from hospital employees, patients, visitors, deliveries, service vehicles, ambulances, and other hospital-related traffic.

The EIR should analyze the combined effect of this traffic on the actual streets and intersections residents use every day, with particular attention to children traveling to and from Anna Yates Elementary School and ECDC, pedestrians, bicyclists using Emeryville's bicycle boulevards, seniors, and other vulnerable road users.

A relatively small geographic area has a limited ability to absorb large increases in vehicle traffic without consequences. I therefore support Mr. Fontas's requests for a rigorous analysis of construction hauling, school-zone safety, neighborhood cut-through traffic, bicycle safety, parking overflow, congestion, and emergency access.

The Livability of Existing Homes

Finally, I ask the EIR to recognize the cumulative effect that these environmental changes could have on the livability of existing homes and neighborhoods.

My condominium is the home in which I planned to live during my retirement. Its livability depends on being able to open my windows, use my outdoor space, sleep without excessive disturbance, breathe reasonably clean air inside my home, and safely walk and travel through my neighborhood.

I am genuinely concerned that years of construction noise, vibration, dust, diesel emissions, truck traffic, and congestion—added to the freeway-related noise and air pollution that already exist—could make what is currently a tenuously livable environment substantially less livable.

I am also concerned about the potential effect on the value and long-term desirability of my home. I understand that property value itself may not necessarily constitute an environmental impact under CEQA. However, the underlying physical conditions that can affect residential livability and desirability —excessive noise and vibration, degraded air quality, traffic, and diminished pedestrian and bicycle safety—are precisely the types of impacts I believe the EIR should thoroughly investigate.

Request for a Comprehensive EIR

For all of these reasons, I ask the City not to examine the Sutter proposal simply as a collection of separate technical issues. The EIR should evaluate the cumulative, interactive, and real-world consequences of placing a project of this size, construction intensity, and 24-hour operation on this particular site and within this particular community.

The purpose of this review should be to identify foreseeable consequences—including unintended and cumulative consequences—before irreversible decisions are made. Important environmental questions should not be deferred until after project entitlements or to later permitting processes where there may be less opportunity for meaningful public review.

Please include this letter in the administrative record for the Sutter Health Emeryville Medical Center EIR and consider these comments in determining the scope of the Draft EIR.

Thank you for the opportunity to comment.

Sincerely,

Linda S. Henderson, Ph.D.
Emeryville Resident

Outlook

Subject: Sutter NOP Comments

From maegan willan <maeganwillan@gmail.com>
Date Mon 9/14/2026 10:45 AM
To Miroo Desai <mdesai@emeryville.org>
Cc atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; Unger, Zachary <zunger@oaklandca.gov>

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I have read through the Notice of Preparation for EIR and have made the best sense of it as I can as a lay person. I write to respectfully request that the scope of the EIR includes a more robust transportation analysis.

We all hope that, twenty years from now, this area will be vibrant, accessible & equitable for all. And the way we can achieve that is to plan for it today. Thank you for the work you're doing to ensure this new hospital campus will not just meet current standards but will raise the bar and elevate our community.

Transportation Analysis: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and neighboring Oakland and Berkeley.

Requests:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute or further bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.

b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the likelihood of traffic violence causing injuries and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.
Please also evaluate the pollution (air, noise and other) caused by increased car traffic.

c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.

d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.

e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:

6.

i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.

ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.

g. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:

8.

i. 40th Street: Broadway to Shellmound
ii. 53rd Street: Adeline to Horton
iii. 55th Street: Telegraph Avenue to Doyle Street
iv. Adeline Street: West Grand to Ashby BART
v. Alcatraz Avenue: Adeline to San Pablo
vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,

Maegan Willan MFT
1475 Powell st Suite 205
Emeryville CA 94608

❤️Solidarity is the tenderness of the people of the world 💞
-Ernesto Cardenal

Maegan Willan, LMFT
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Outlook

Comments on the Scope of the EIR for the Sutter Emeryville Medical Center Project

From Margaret Bendet <margaretbendet@gmail.com>
Date Sat 9/12/2026 10:27 AM
To Miroo Desai <mdesai@emeryville.org>

Dear Ms. Desai:
I am submitting these comments regarding the scope of the EIR for Sutter Health's proposed Emeryville Medical Center. My response below serves as a formal scoping request for the project's Environmental Impact Report and for the project's non-CEQA transportation analysis.

I have been a resident on Fremont Street, between 59th and Powell, for the last year. Most of the houses in my block use on-street parking for one or two vehicles. Currently, the street is almost always full of cars, with just an empty space or two. If, just a few blocks away, Sutter Health is allowed to construct a medical facility to be accessed by thousands of people each day with the miniscule number of onsite parking places they have planned, there will be a glut of cars parked on all of the streets in this neighborhood.

I want to point out that when Kaiser Permanente builds a facility, they provide onsite parking for their employees and also for their patients. And this is low-cost *Kaiser*! I needed to arrange for medical coverage a year ago, when I moved to this area from out-of-state, and I couldn't even consider using Sutter Health. Their fees were too high. I contracted with Kaiser, which was within my budget. So, now, I find that Sutter, this exorbitantly priced medical organization, seeks to build a facility that will drastically increase traffic in my neighborhood, bring in ambulances with piercing sirens at all hours of the day and night, and challenge my ability to find parking in front of the house I live in. Sutter is treating Oakland, Emeryville, and the Golden Gate neighborhood as if we were a natural resource they have a right to plunder in order to support their offering high-cost medical services for people who make their homes elsewhere.

Please support an Environmental Impact Report regarding the physical dangers of the projected additional traffic, the health effects of the projected noise pollution, and whether there will be sufficient parking for the number of vehicles expected on a daily basis.

Sincerely,
Margaret A. Bendet
360-320-2800

5853 Fremont St.
Oakland, CA 94608

margaretbendet@gmail.com

Outlook

Sutter NOP Comments

From Marianna Stark <starkm510@gmail.com>
Date Mon 9/14/2026 3:57 PM
To Miroo Desai <mdesai@emeryville.org>
Cc zunger@oaklandca.gov <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>; Sam Perry <sam9484@sbcglobal.net>

Miroo Desai, AICP
Planning Manager, City of Emeryville,
1333 Park Avenue,
Emeryville, CA 94608

CC: Councilmember Zac Unger
Councilmember Rowena Brown
Councilmember Ben Bartlett
Councilmember Terry Taplin
William Gilchrist, City of Oakland
Josh Rowan, City of Oakland
Jordan Klein, City of Berkeley,
Jamie Parks, City of Berkeley

September 14, 2026

Dear Ms. Desai,

I have been a resident of 5944 Vallejo Street at 61st Street in Oakland for sixteen years. My husband Sam Perry has lived here for over thirty years. **The bottom line is that the proposed project is WAY TOO LARGE for the selected location at 53rd/Hollis.** This location seems "industrial" but in reality the adjoining densely populated residential neighborhoods are a web of narrow residential streets and dead ends. Hollis/Powell/Stanford/40th/San Pablo Ave are already dangerous traffic corridors with schools, senior centers, bike routes, playgrounds, and many white "ghost" bikes memorializing riders killed in traffic on these streets. We are in favor of growth on a different street that has the capacity for the massive volume of cars that will come.

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR).

We all hope that, twenty years from now, this area will be vibrant, safe, accessible & equitable for all. And the way we can achieve that is to plan for it today. Thank you for the work you're doing to ensure this new hospital campus will compliment and sustain our community.

Respectfully,
Marianna Stark and Sam Perry
5944 Vallejo St
Oakland, CA 94608

Marianna Stark

Mobile 415-407-8743

Mailsuite Sender notified with Mailtrack · Opt out

Outlook

Sutter Build, Concern and comments

From Melanie Shartsis <melanie.shartsis@gmail.com>
Date Mon 9/14/2026 11:33 AM
To Miroo Desai <mdesai@emeryville.org>
Cc zunger@oaklandca.gov <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; wgilchrist@oaklandc.gov <wgilchrist@oaklandc.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>

Dear Ms. Desai,

I am writing to express my concerns regarding the potential transportation and traffic impacts associated with the new hospital development.

I hope the city will conduct a thorough, deep-dive analysis to identify effective measures to mitigate these issues and ensure that the surrounding community is not adversely affected.

Thank you for your time and for considering the interests of local residents.

Best regards,

Melanie Shartsis
1152 64th St, Oakland, CA 94608

Outlook

Comments on the Scope of the EIR for the Sutter Emeryville Medical Center Project

From Michael Coulom <michael.coulom@gmail.com>
Date Mon 9/14/2026 1:42 PM
To Miroo Desai <mdesai@emeryville.org>
Cc zunger@oaklandca.gov <zunger@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I write to respectfully request that the scope of the EIR includes the following specific conditions and associated mitigations and community benefits.

1. **Level of Analysis**: It has been nearly 30 years since the proposed project site, part of the 22-acre Emeryville Life Sciences Center Planned Unit (PUD-3), also known as the “Chiron PUD/PDP”, last went through a significant public review process and environmental evaluation. Despite this long duration, significant portions of the plan area and proposed project site remain vacant or below full build-out conditions. Identifying, mitigating, and communicating the environmental impact of the proposed Sutter project will require comparing the proposed project conditions to those of PUD-3 as planned, today’s existing conditions (2026), and future near- and mid-term build out conditions of the phased hospital project and planned or forthcoming projects in the area surrounding the proposed project.

   Request:
   a. Clearly discern between conditions under the proposed project’s build-out, existing conditions, and anticipated conditions of the fully built Emeryville Life Sciences Center Planned Unit.

2. **Transportation Analysis**: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and surrounding communities.

   Request:
   a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.
   b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the

likelihood of traffic violence causing property damage, injuries, and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.

c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.

d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.

e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:

6.
   i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.
   ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.
   iii. A variant that integrates the shuttle station within the footprint of Building B.

g. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:

8.
   i. 40th Street: Broadway to Shellmound
   ii. 53rd Street: Adeline to Horton
   iii. 55th Street: Telegraph Avenue to Doyle Street
   iv. Adeline Street: West Grand to Ashby BART
   v. Alcatraz Avenue: Adeline to San Pablo
   vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
   vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
   viii. Stanford/Powell Avenues: Adeline to proposed project area

3. **Noise and Air Quality**: The EIR and potential mitigations should consider the impacts to noise and air quality from construction and permanent impacts. The EIR should consider mitigation in the form of home hardening including, but not limited to, technical assistance and direct financial assistance for the replacement of windows and improvement of noise insulation at residential, recreational, and childcare facilities within one-half mile of the proposed project.

4. **Hazards**: The EIR should identify environmental hazards in the proposed project area and likely to be impacted by the proposed project, including subterraneous contamination and underground storage tanks. The EIR should identify all necessary mitigations necessary to stop the spread of contamination from reaching residences, recreational and child care facilities, and public facilities. The EIR should identify risks and mitigations for preventing the spread of contamination to Temescal Creek.

5. Community Benefits: The City of Emeryville, in collaboration with the impacted Cities of Oakland and Berkeley, should collaborate to consider the following community benefits:

6. a. Improvements to the active transportation and public transportation systems, including but not limited to financial assistance for capital projects planned by one or more impacted jurisdiction; financial assistance for the planning, design, and environmental analysis of an improvement project planned by one or more jurisdiction, including but not limited to the multi-jurisdictional Stanford Avenue Greenway; and ongoing financial assistance for the repair, maintenance, and replacement of bus shelters along San Pablo Avenue and other transit corridors.
   b. Small business support, including but not limited to micro-grants for small businesses within at least one-half mile of the proposed project area, seed capital and ongoing technical support for a San Pablo Avenue business improvement district, financial assistance for the acquisition of vacant commercial retail properties and their restoration to productive uses.
   c. Improvements to parks and recreational facilities, including ongoing support for park maintenance, cleaning, and litter removal.
   d. Support to identify problem spots and mitigate illegal dumping.

Respectfully,
Michael Coulom

SUTTER HOSPITAL MEDICAL CENTER: NOP COMMENTS

Section 1: Public Comments

Section 2: Comments Made by Public Entities

SECTION 1: PUBLIC COMMENTS LIST BY NAME

	NAME
1	Pat Charley
2	Lisa Henderson
3	Connie Zheng
4	Shervin Dastpak
5	Hillari Allen
6	Brian Donahue via Richard Rhinehart #1
7	Ashley Yue
8	Roberra Aklilu
9	Brian Donhaue via Richard Rhinehart # 2
10	Laura McCamy
11	Baruch Golden
12	Angela Gennino (Golden Gate Community Association)
13	Eric Pankonin
14	Bonnie Eslinger
15	Julie Bongers
16	JE Rainer
17	Eric Arico
18	Devaki Merrill
19	Yuliya Rzad
20	Diana & Byron Soublet
21	Rebecca C
22	Jeff Fontas
23	Olive Kersey
24	S Beatty
25	Teresa Kalnoskas
26	Linda Henderson # 2
27	Kathryn Webb
28	Margaret Bendet
29	Scott Wades
30	Megan Willan
31	Brandon Soublet
32	Patricia Lincoln
33	Michael Coulom
34	Karpura Komm
33	East Bay Village
34	Tracy Lincoln # 1
35	Andrew Brodie
36	Daniela Mavrici

37	Eleanor Wohlfeiler
38	Melanie Shartsis
39	Cathy Leonard
40	John Amador
41	Marianna Stgark
42	Judith Timmel
43	Gail Donaldson
44	Quinn Eide
45	Tisha Barrows
46	Aaron Woolsey
47	Sejal B
48	Dylan Kievit
49	Bobbi Lopez
50	Rose Johnson
51	Jeff Johnson
52	Carol Silverman
53	Tracy Lincoln # 2
54	Susana Garcia
55	Shannon Tracey
56	Jennifer Mayfield
57	Jordan Wax

SECTION 2: COMMENTS MADE BY PUBLIC ENTITIES

	NAME
1	DTSC
2	EBMUD
3	Golden Gate Bird Alliance
4	City of Oakland
5	ACTC
6	Caltrans
7	AC Transit
8	Port of Oakland

Outlook

Sutter NOP Comments

From Olive B. Kersey <olivekersey@gmail.com>
Date Sat 9/12/2026 7:29 PM
To Miroo Desai <mdesai@emeryville.org>
Cc zunger@oaklandca.gov <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>

Miroo Desai, AICP,
Planning Manager, City of Emeryville,
1333 Park Avenue,
Emeryville, CA 94608

CC: Councilmember Zac Unger
Councilmember Rowena Brown
Councilmember Ben Bartlett
Councilmember Terry Taplin
William Gilchrist, City of Oakland
Josh Rowan, City of Oakland
Jordan Klein, City of Berkeley,
Jamie Parks, City of Berkeley

September 12, 2026

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I write to respectfully request that the scope of the EIR includes the following transportation analysis.

We all hope that, twenty years from now, this area will be vibrant, safe, accessible & equitable for all. The way we can achieve that is to plan for it today. Thank you for the work you're doing to ensure this new hospital campus will compliment and sustain our community.

Transportation Analysis: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and surrounding communities.

Requests:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.
b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the likelihood of traffic violence causing injuries and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.
c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.
d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.
e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:
    i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.
    ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.
f. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:
    i. 40th Street: Broadway to Shellmound
    ii. 53rd Street: Adeline to Horton
    iii. 55th Street: Telegraph Avenue to Doyle Street
    iv. Adeline Street: West Grand to Ashby BART

v. Alcatraz Avenue: Adeline to San Pablo
vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,

Olive Kersey

RECEIVED ON 8/26/2026
- MD, Planning Manager

P. Charley
5837 Fremont St.
Oakland, CA 94608

August 22, 2026

Muriel Desai AICP
Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville CA 94608

Dear Plan Manager:

As a long term resident on Fremont Street, I have experience with medical staff parking on residential streets for convenience, proximity to their work, and to avoid garage fees. Stanford employees regularly park, utilizing my guest space & residential access to houses.

With the new hospital, the parking and street plans are not adequate to avoid punishing congestion, traffic delays, and overflow into residential areas. To ask staff to shuttle to offlying lots is not realistic. If you don't require physicians and all administrators of the hospital to do the same commute you are promoting status inequity right from the start of the project. It's also unrealistic to think folks will be biking to their surgery, or walking home from a hospital stay. When there are 5000 people utilizing the hospital you need 5000 spaces. You also need to revisit (at great wasted cost) the narrowing of

Hollis Street. This street design has significantly slowed egress. Many parking spots have been lost on the street due to crazy lane changes for no obvious reason. This street in particular needs to be a smoothly operating boulevard with timed lights if it's to bear its burden of thousands more cars per day.

We look forward to a modern Hospital complex built off the streets but making sure it does not become the Sutters, Kaisers, Alta Bates congested mess is up to you Now to foresee and insist that parking is adequately addressed, plentiful, and free to keep medical parking out of neighborhoods.

Thankyou for receiving comments from the community. Please respect our efforts to rebuild these neighborhoods into desirable places to live and work without the burden of traffic and parking that must be solved in the planning stages of development.

Sincerely,

Pat Charley

Outlook

SUTTER HOSPITAL MEDICAL CENTER SCOPING COMMENTS

From sbclifs@aol.com <sbclifs@aol.com>
Date Mon 9/14/2026 1:42 PM
To Miroo Desai <mdesai@emeryville.org>

1 attachment (23 KB)
Scoping Comments for EIR detailed.docx;

Dear Miroo Desai,

Attached please find my Scoping Comments regarding the Sutter Hospital Medical Center Environmental Impact Report (EIR).
I appreciate your time, and I look forward to reviewing a comprehensive draft EIR that thoroughly addresses these very important issues.

Thank you.

Sincerely,
Patricia Lincoln
53rd Street resident and homeowner

Outlook

Sutter Health Project EIR Response

From Quinn Eide <quinneide98@gmail.com>
Date Mon 9/14/2026 4:30 PM
To Miroo Desai <mdesai@emeryville.org>

Miroo,

Im an Emeryville resident who lives on 54th St. I am glad to see development in the once vacant area in the industrial district and am happy to see a community serving industry step in - a hospital is a service we can all benefit from. That being said, I'm concerned about a few specific elements.

1) Public transit is already suffering from limited funding. I'd like for Sutter Health to contribute new funding to the EmeryGoRound or AC Transit budget to allow for substantial increases in service to accommodate their needs. This would result in better service for Emeryville community members including more service to the West Oakland BART station. We dont need more private shuttles - we need better public transit.

2) I'm concerned about the air and water quality impacts of the construction on a superfund site. To my understanding, the Horton/53rd site is quite polluted from the historical Shell research facility. It would be a great community benefit for this to be cleaned up, but I'd request that the clean up process is done with the highest mitigation technology available to protect the air and water surrounding the site from pollution and that there is high transparency with community members about potential health impacts and contaminants that are being stirred up during the process.

3) The proposed cultural acknowledgements in Sutter Health's plans were abominable. They were a series of appropriative and over simplistic misuses of Ohlone culture and history. I'd request that the indigenous community be invited into the planning process and offered leadership in the design process.

Best,

Quinn Eide

Outlook

Environmental impact sutter proposal

From Rebecca C <loveneighbor613@gmail.com>
Date Sun 9/13/2026 8:58 AM
To Miroo Desai <mdesai@emeryville.org>

Thank you for choosing public service. I live on 53rd St. and Gaskill in 94608, in Oakland, across the street from Temescal Park in Emeryville.

I support healthcare, and I am concerned that this Sutter project needs to be situated in a neighborhood with better transportation access rather than this neighborhood.

I would like you to build in a neighborhood that does not have contaminated soil but has better soil to start with.

I request that you study the impact of air quality from Construction and from traffic. I request that you study the specific impact of the air quality changes on people with asthma, disabilities, and multiple chemical sensitivity.

The streets in our neighborhood have speed bumps and are not meant for through traffic. Though they are too way, they cannot actually be used as two-way streets, and a car has to pull over if a car is coming from the other direction. When people who do not live in the neighborhood try to use our streets, they go too quickly, or they do not wait and take turns when people are politely giving each other a chance to take turns going through one at a time.

I request that you spend time on the street, for example, in the block of 53rd St. between Adeline and Gaskill, to see how neighbors use the streets when driving.

I live with multiple chemical sensitivity. I request that you use the standard of preserving our air in what is called the green, good quality, on all the days possible, rather than just trying to keep it away from moderate, unhealthy for sensitive groups, or unhealthy categories.

I request that you study the public health impacts of helicopter noise on sleep and look at the international public health research on the impacts on sleep.
I request that you study the noise Impact of traffic and helicopters.

Thank you very much for your support of people with disabilities and of our neighborhood.

Rebecca C

Outlook

Emeryville Sutter Project Comment

From Richard Rhinehart <rmccaver@gmail.com>
Date Thu 8/27/2026 4:52 PM
To Miroo Desai <mdesai@emeryville.org>

Dear Ms. Desai:

I am reaching out to you on behalf of my colleague, Brian Donahue, who is unable to communicate with you directly. Please forward this comment to the appropriate party. Thank you for your kind assistance!

RE: NOP Comments for the Emeryville Sutter Project

Transportation Concerns

The preparations of documents associated with this project must acknowledge Emeryville's existing Alternative Transportation Plan (ATP) which defers to the National Association of City Transportation Officials (NACTO) guidelines vis a vis bike boulevards. Specifically, a bike boulevard is required to have no more than 3000 vehicle trips per day (VTD) on it. To the extent that this project pushes any bike boulevard vehicle traffic over the 3000 VTP threshold (including but not limited to the Horton Street Bike Boulevard), mitigation measures must comply with the ATP/ NACTO guidelines and guarantee a timely traffic calming program be implemented that takes the number down to less than 3000 VTD should initial design not be 100% effective.

Further, it must be explained specifically how the mitigations will work and the pathway to compliance shown (in the event of failure). Also, there must be provisions made to have the general public be a part of the policing of the mitigation monitoring plan owing to the fact that the City of Emeryville has not traditionally placed safe biking at the center of it's transportation planning (City Hall proclamations to the contrary notwithstanding). It is taken as a given that any mitigation monitoring program should be rigorous enough to withstand public scrutiny. The process should allow for ANY member of the public (even unpopular people) to register complaints/ make inquiries about the VTP threshold. By "allow" I mean complaints and inquiries received need to be taken seriously and investigated in good faith. A program to assure this must be shown.

Lastly, Holden Street must be included as a study corridor. Already, before the Sutter project completion, Holden Street is used as a cut through path by vehicles hoping to beat traffic on Horton and Hollis streets. Because this problem will only be exacerbated by the Sutter generated traffic, Holden Street must be included in the study.

Brian Donahue
4333 Holden Street
Emeryville, CA
94608
sophbeau@yahoo.com

(510) 717-1281

Outlook

3 Sutter Hospital Medical Center EIR Scoping Comment

From Rob <roberra.aklilu@gmail.com>
Date Fri 8/28/2026 4:58 PM
To Miroo Desai <mdesai@emeryville.org>

Hello, please see below for 3 comments on the Sutter expansion

1- EIR Scoping Comment — Hazardous Materials and Vapor Intrusion

I am a resident of **4610 Hubbard Street**, near the proposed Sutter Emeryville Medical Center at **5300 Chiron Way**. I request that the EIR specifically evaluate existing soil, groundwater, and soil-vapor contamination and whether construction could disturb or alter the migration of those contaminants.

This is particularly important given the ongoing remediation of the nearby **former Marchant/Whitney industrial site at 5679 Horton Street**, where contaminated groundwater and soil vapor, including VOCs such as TCE, have been identified.

Under **Hazards and Hazardous Materials, Air Quality, Hydrology and Water Quality, and Geology and Soils**, I request that the EIR:

1. **Map existing contamination and plume boundaries**, including groundwater flow and the relationship between the Sutter property, Marchant/Whitney contamination, and surrounding residences.
2. **Evaluate vapor-intrusion risks** for both the future hospital and nearby residents, including properties along Hubbard and Horton Streets.
3. **Analyze construction impacts**, including whether excavation, dewatering, foundations, or utility work could mobilize contaminants or create new groundwater or soil-vapor pathways.
4. **Evaluate cumulative impacts** of Sutter construction occurring alongside the Marchant/Whitney remediation.
5. **Establish baseline monitoring and enforceable mitigation**, including appropriate groundwater, soil-gas, and air monitoring, publicly available results, health-based thresholds, and corrective-action requirements.

Because the hospital will serve sensitive populations and residents live immediately around this redevelopment area, the EIR should provide a **site-specific assessment rather than relying on assumptions based on distance from known contamination**.

I support responsible development of the medical center. My request is that the City establish whether legacy industrial contamination presents risks to the project or surrounding community and ensure construction does not inadvertently create new exposure pathways.

2 - Shuttle Access and Transportation-Demand Assumptions

I request that the EIR independently verify the operation and availability of Sutter Health's existing and proposed shuttle services before assigning any reduction in vehicle trips or other transportation benefit to those services.

There appears to be a discrepancy between representations that Sutter shuttle service is available to patients or the public and how the service is actually operated. I personally attempted to board a Sutter shuttle and was denied access. I was informed by the driver and subsequently by shuttle management that the service was exclusively for Sutter employees.

This distinction is important to the environmental analysis. If the EIR assumes that patients, visitors, or members of the public can use Sutter shuttles—and therefore assumes that some of their trips will occur by shuttle rather than private vehicle or rideshare—the City should verify that those individuals are actually permitted to use the service.

The EIR should disclose who is currently eligible to use each shuttle service, who will be eligible after completion of the proposed project, the routes and frequency of service, expected ridership by user type, and the methodology used to calculate any resulting reduction in vehicle trips.

Any trip-reduction credit attributed to shuttle service should be supported by documented operating policies and enforceable commitments. If patient or public access is necessary to achieve the transportation assumptions used in the EIR, that access should be made an enforceable project requirement rather than a voluntary or aspirational measure.

The EIR should also account for the vehicle impacts of the shuttle operations themselves, including shuttle trips through the surrounding narrow local street network, rather than treating shuttle service solely as a transportation benefit.

3 - Transportation, Traffic, and Local Street Circulation

I am concerned about the additional vehicle traffic the proposed project could introduce to Hubbard Street and the surrounding network of narrow local streets.

The area around 4610 Hubbard Street already experiences substantial vehicle activity. The existing large residential complex generates regular Uber/Lyft trips, food and package deliveries, pickups and drop-offs, and other short-duration vehicle movements throughout the day. Existing Sutter Health operations, including its large parking facility and employee shuttle traffic, add additional vehicles to these streets. Based on my regular observations, congestion is particularly noticeable in the late afternoon, including around and after 4:00 p.m.

My concern is not simply that traffic might be routed onto Hubbard Street. Hubbard Street is already part of the problem, as are the surrounding narrow local streets. Shifting project-generated traffic from one neighborhood street to another would not adequately address the impact.

The EIR should establish an accurate existing-condition baseline for the entire local street network surrounding the project and then analyze the additional and cumulative effects of the proposed hospital and medical uses.

Specifically, I request that the EIR:

1. Conduct actual traffic counts and field observations on Hubbard Street and the surrounding local streets during representative weekday periods, including around and after 4:00 p.m.
2. Account for existing residential traffic, Uber/Lyft activity, food and package deliveries, existing Sutter traffic, parking-facility ingress and egress, and shuttle operations when establishing the environmental baseline.
3. Analyze the additional vehicle demand generated by hospital employees, patients, visitors, vendors, deliveries, rideshare vehicles, shuttles, and other project-related activity.
4. Evaluate circulation and congestion across the surrounding local street network rather than assuming that redirecting traffic from one local street to another constitutes mitigation.
5. Analyze vehicle queuing, double parking and pickup/drop-off activity, parking ingress and egress, pedestrian and bicycle conflicts, emergency access, and the ability of vehicles to safely pass on narrow streets.
6. Evaluate the cumulative effect of the proposed project together with the existing residential development, Sutter facilities, parking infrastructure, and other existing and reasonably foreseeable development in the area.

Any mitigation should reduce the project's overall vehicle impacts on the surrounding neighborhood rather than merely redistributing those impacts among Hubbard Street and adjacent local streets. The EIR should identify enforceable measures to reduce project-generated vehicle trips and manage circulation, parking, deliveries, rideshare activity, and other transportation demand before concluding that these impacts can be adequately mitigated.

Outlook

Sutter NOP Comments

From Rose Johnson <johnson.rose@gmail.com>

Date Mon 9/14/2026 4:59 PM

To atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>; Miroo Desai <mdesai@emeryville.org>; zunger@oaklandca.gov <zunger@oaklandca.gov>

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I have read through the Notice of Preparation for EIR and have made the best sense of it as I can as a lay person. I write to respectfully request that the scope of the EIR includes a more robust transportation analysis.

We all hope that, twenty years from now, this area will be vibrant, accessible & equitable for all. And the way we can achieve that is to plan for it today. Thank you for the work you're doing to ensure this new hospital campus will not just meet current standards but will raise the bar and elevate our community.

Transportation Analysis: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and neighboring Oakland and Berkeley.

Requests:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute or further bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.
b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the likelihood of traffic violence causing injuries and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing

increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.
Please also evaluate the pollution (air, noise and other) caused by increased car traffic.

c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.
d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.
e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:
    i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.
    ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.
f. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:
    i. 40th Street: Broadway to Shellmound
    ii. 53rd Street: Adeline to Horton
    iii. 55th Street: Telegraph Avenue to Doyle Street
    iv. Adeline Street: West Grand to Ashby BART
    v. Alcatraz Avenue: Adeline to San Pablo
    vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
    vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue

viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,

Rose Johnson
1180 62nd Street
Oakland 94608

More ways to connect:
Join my newsletter for updates and events.
Subscribe to my YouTube channel.
Check out my website and book a 30 minute Joy Ride!

Outlook

Sutter NOP Comments

From S Beaty <beaty.susan@gmail.com>
Date Sat 9/12/2026 5:58 PM
To Miroo Desai <mdesai@emeryville.org>
Cc Zachary Unger <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; Gilchrist, William <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>

Miroo Desai, AICP,
Planning Manager, City of Emeryville,
1333 Park Avenue,
Emeryville, CA 94608

CC: Councilmember Zac Unger
Councilmember Rowena Brown
Councilmember Ben Bartlett
Councilmember Terry Taplin
William Gilchrist, City of Oakland
Josh Rowan, City of Oakland
Jordan Klein, City of Berkeley,
Jamie Parks, City of Berkeley

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR).

I live close to the proposed site at the intersection of 57th Street and Lowell Street in North Oakland. My main concern about the project is transportation: I believe a robust EIR will indicate that the only way to sustainably and safely implement this project is by investing deepy in public transit, bicycle infrastructure, and pedestrian safety in the surrounding neighborhoods, including my own. **I therefore write to respectfully request that the EIR include an analysis of transportation and mobility impacts for Emeryville and adjacent communities.**

Requests:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.

b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the likelihood of traffic violence causing injuries and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.
c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.
d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.
e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:
    i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.
    ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.
f. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:
    i. 40th Street: Broadway to Shellmound
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    vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
    vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
    viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,

Susan Beaty

Outlook

Sutter NOP Comments

From Scott Owades <jeremyscottowades@gmail.com>
Date Fri 9/11/2026 6:39 PM
To Miroo Desai <mdesai@emeryville.org>
Cc Unger, Zachary <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>

Miroo Desai, AICP,
Planning Manager, City of Emeryville,
1333 Park Avenue,
Emeryville, CA 94608

CC: Councilmember Zac Unger
Councilmember Rowena Brown
Councilmember Ben Bartlett
Councilmember Terry Taplin
William Gilchrist, City of Oakland
Josh Rowan, City of Oakland
Jordan Klein, City of Berkeley,
Jamie Parks, City of Berkeley

September 11, 2026

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I write to respectfully request that the scope of the EIR includes the following transportation analysis.

We all hope that, twenty years from now, this area will be vibrant, safe, accessible & equitable for all. And the way we can achieve that is to plan for it today. Thank you for the work you're doing to ensure this new hospital campus will compliment and sustain our community.

Transportation Analysis: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and surrounding communities.

Request:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.
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c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.
d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.
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vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,

Scott Owades
Oakland Resident (2 blocks from Emeryville border, 5 blocks from the Sutter project)

Outlook

Public Scoping Comments and Environmental Requests for Sutter Hospital Medical Center (PUD25-001)

From Sejal B <s.babaria@gmail.com>
Date Mon 9/14/2026 4:46 PM
To Miroo Desai <mdesai@emeryville.org>

To: Miroo Desai,

I am submitting these comments regarding the scope of the EIR for Sutter Health's proposed Emeryville Medical Center. My response below serves as a formal scoping request for the project's Environmental Impact Report and for the project's non-CEQA transportation analysis. I **am a resident of 53rd St between San Pablo Ave and Adeline St. I'm extremely concerned about this project for a variety of reasons, but would like to highlight and make the request below:**

EIR must analyze whether heavy construction planned for 6+ years at the project site will:
• Violate applicable air-quality standards
• Result in a cumulatively considerable net increase of criteria pollutants
• Expose sensitive receptors to substantial pollutant concentrations
• Create other localized air-quality effects associated with increased vehicle activity
Legal Relevance under CEQA:

T**he EIR must analyze the project's substantial construction activities under:**
• Air Quality CEQA Appendix G, Section I, (a) (b), (c), (d), (e)

Thank you,
Sejal

--
Sejal A. Babaria
Pronouns: She/Her/Hers

Outlook

Fw: Comments on the Scope of the EIR for the Sutter Emeryville Medical Center Project

From Shannon Tracey <setracey@yahoo.com>
Date Mon 9/14/2026 8:29 PM
To Miroo Desai <mdesai@emeryville.org>

I'm so sorry, I had your email address wrong! Please see below for my comment, originally submitted at 3:46pm.

Shannon Tracey
(510) 338-2937 cell

----- Forwarded Message -----
From: Shannon Tracey <setracey@yahoo.com>
To: mdesai@emeryville.com <mdesai@emeryville.com>
Sent: Monday, September 14, 2026 at 03:46:06 PM PDT
Subject: Comments on the Scope of the EIR for the Sutter Emeryville Medical Center Project

Dear Ms. Desai:
I am submitting these comments regarding the scope of the EIR for Sutter Health's proposed Emeryville Medical Center. My response below serves as a formal scoping request for the project's Environmental Impact Report and for the project's non-CEQA transportation analysis.

I believe that we need to have infill developments in urban areas to best meet our community's needs in a climate-friendly way. I urge you to study the ways that transportation demand management could reduce car trips to and from the proposed project and provide greater neighborhood mobility. Would increased bus service and bike/ped infrastructure be effective at not only serving this new project but also offering greater connectivity for neighborhood residents? What funding sources, including project impact fees or other developer contributions, could be used to strengthen non-car transportation in the area? While some medical center staff, patients, and visitors will necessarily need car and ambulance transportation to reach the site, many will not - and the frequency, reliability, and safety of alternative modes will have an impact not only on the transportation choices of those coming to/from the medical center, but also on the transportation options of local residents.

Over 15 years on the border between Oakland and Emeryville, I have watched transit be cut even as services, stores, and housing has been built in Emeryville. My home has been too far from BART for it to be useful, and in the "donut hole" of bus lines serving Emeryville/Bay Street. Leveraging this project to provide better transit in the area, not just to access this new nearby medical center but also other destinations, could provide a huge benefit to our community and reduce our need to spend money on expensive, polluting gas for our cars.

Thank you for your work on this project!

Shannon Tracey
Homeowner at 893 56th St, Oakland, CA 94608
(510) 338-2937 cell

Outlook

Public Comment Regarding Sutter Hospital Medical Center EIR

From Shervin Dastpak <shervin.dastpak@gmail.com>
Date Thu 8/27/2026 9:40 AM
To Miroo Desai <mdesai@emeryville.org>

Dear Miroo Desai,

I am writing to express my concerns regarding the proposed Sutter Emeryville Medical Center project and to request that the Environmental Impact Report (EIR) thoroughly evaluate its potential negative impacts on the surrounding community.

I am particularly concerned about **public safety, homelessness, traffic, and the overall impact on the quality of life in the surrounding neighborhood**. A project of this size, including a large hospital, medical offices, parking facilities, and a proposed public park, could significantly increase activity in the area.

I respectfully ask that the EIR carefully study:

- Potential increases in traffic, congestion, and pedestrian safety risks.
- Emergency vehicle activity and its impact on surrounding streets.
- Public safety and security around the hospital, parking areas, sidewalks, and proposed public spaces.
- The potential for increased loitering, unauthorized camping, or homelessness-related impacts in and around the project area.
- How the proposed public park will be maintained, monitored, and secured.
- Whether existing police, fire, emergency, sanitation, and other public services have sufficient capacity to support the increased activity.
- Construction-related noise, dust, air-quality impacts, traffic, and disruption to nearby residents and businesses.
- Appropriate mitigation measures to protect nearby residents, businesses, pedestrians, and visitors.

I support the availability of quality medical care in Emeryville, but I believe the size and scale of this project require careful consideration of its broader environmental and community impacts. Public safety and the management of public spaces should be addressed proactively rather than after problems occur.

Please include these concerns in the EIR scoping process and ensure that appropriate mitigation measures and alternatives are thoroughly evaluated before the project is approved.

Thank you for considering my comments.

Sincerely,
Shervin Dastpak

Outlook

Public Scoping Comments – Sutter Hospital Medical Center (PUD25-001)

From susana garcia <spgarcias@yahoo.com>
Date Mon 9/14/2026 5:39 PM
To Miroo Desai <mdesai@emeryville.org>

Miroo Desai
Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

September 14, 2026

RE: Public Scoping Comments – Sutter Hospital Medical Center (PUD25-001)

To Miroo Desai,

My name is Susana Garcia, and I live at the corner of 55th Street and Adeline Street, near the proposed Sutter Health Medical Center site. I am submitting this comment to request that the Environmental Impact Report (EIR) include a dedicated traffic impact study of the 55th Street corridor.

55th Street Corridor

55th Street is a primary route for drivers coming from Oakland and the greater East Bay, as well as for traffic coming off Martin Luther King Jr. Way. Past Adeline Street, however, 55th Street narrows significantly. It is not built to handle high volumes of traffic, and safety incidents — including vehicle collisions — have already occurred there because of the narrow roadway. The corridor also has bike lanes in active use, which increases the potential for conflicts between cars, bikes, and pedestrians if vehicle volumes rise.

We have direct, recent experience with what this kind of impact looks like: when a "ghost kitchen" delivery facility opened nearby, traffic on and around 55th Street became severe, with congestion, unsafe driving behavior, and general gridlock in the surrounding residential streets. A hospital of the scale being proposed — with ambulance, patient, visitor, delivery, and employee traffic operating at much higher volumes and around the clock — would have a far greater and more sustained impact on this corridor than that prior experience.

I am asking that the Draft EIR specifically evaluate:

- The projected increase in vehicle trips on 55th Street generated by the hospital, particularly the segment east/west of Adeline Street.
- The corridor's physical capacity constraints (narrow roadway width, on-street parking, bike lane conflicts) and how they affect safety and traffic flow.
- Cumulative impacts from combining hospital traffic with existing residential and bicycle/pedestrian use.

- Emergency vehicle access and how ambulance routing along or near 55th Street would affect residents and other road users.

I want to note that I understand today's 5:00 PM deadline for scoping comments, and I regret that I am submitting this approximately 40 minutes late. My family experienced a death this past weekend, which prevented me from submitting on time. I respectfully ask that this comment still be considered as part of the scoping process, and I trust that a full and thorough traffic study will be conducted before any approvals move forward.

Thank you for your attention to this matter.

Sincerely,

Susana Garcia
936 55th Street,
Oakland CA 94608

Teresa Kalnoskas
4333 Holden St. #56
Emeryville, CA 94608

September 12, 2026

Miroo Dasai
AICP, Planning Manager, City of Emeryville
1333 Park Ave
Emeryville, CA 94608

As an Emeryville resident and active community participant, I urge your committee to block the Sutter Hospital Project from proceeding further. The environmental impact is clear; The Sutter Development will wipe out life as we know it in our city.
Specifically:

- Air pollution from 20,000 + vehicles / day, including the gas-powered shuttles that already exhibit fumes. Human, animals, and wildlife will all be permanently poisoned.
- Toxic vapors from contaminated soils. Human, animals, and wildlife will all be permanently poisoned.
- Sound Pollution from seven years of building; followed by daily helicopters, sirens, and cars. Wildlife, domestic animals, and residents will find this unbearable and move away.
- Traffic on residential streets will kill and injure children, adults, and wildlife.
- Removal of Hollis Park is another horrible consideration. Parks and trees mitigate pollution.
- A 330-foot building with 100-foot deep pile supports? This monstrous building will block our bay views and sunlight. Hospitals always need space to grow. Where will they go next? More 300-foot buildings?

There are no alternate solutions, but to stop this project. This is a crime of no return to the Emeryville citizens.

I have lived one block from the proposed sight for forty years. I will certainly be moving if this project goes through, as many in our community will do.

Sincerely,

Teresa Kalnoskas

Outlook

Comments on the Scope of the EIR for the Sutter Emeryville Medical Center Project

From Tisha Barros <tkbarros13@gmail.com>
Date Mon 9/14/2026 4:18 PM
To Miroo Desai <mdesai@emeryville.org>

Dear Ms. Desai,

I am submitting these comments regarding the scope of the EIR for Sutter Health's proposed Emeryville Medical Center. My response below serves as a formal scoping request for the project's Environmental Impact Report and for the project's non-CEQA transportation analysis.

1. **Traffic Volumes in Golden Gate Neighborhood**

During the Planning Commission meeting on June 25, the applicant's traffic consultant stated "the feasibility traffic study considered about 5% of the total project traffic using 53rd St. to the east of Hollis; the analysis assumes that most of the traffic would use Hollis from Powell or from 40th St. to Hollis or Horton St." As 37-year residents of the Golden Gate neighborhood, we do not think the 5% estimate is realistic.

The Golden Gate neighborhood is already used as a cut-through from CA-24 to points west, including the entire city of Emeryville. The intersections of Martin Luther King Jr. Way (MLK) at 52nd, 53rd, and 55th streets are already under particular strain given the expansion of the UCSF Benioff Children's Hospital. We fear that adding even 5% of the projected 20,000 daily vehicle trips (which, again, we find unrealistic given decades of lived experience, and given that the City of Oakland is currently bidding out a construction contract for narrowing MLK) would create a traffic environment that is neither safe nor beneficial for any of its users.

In fact, with respect to the Martin Luther King Jr. Way Complete Streets Paving Project, OakDOT asserts the following based on analysis by Fehr & Peers, the traffic consultant retained by Urban Planning Partners (UPP) for this project:

"Peak hour volumes on the corridor currently exceed the street's capacity during AM and PM peak hours, causing back-ups near the CA-24 highway ramps. Some queue lengths will increase during the peak hour with a 4-lane design of MLK, some queue lengths at red lights will increase during peak hours at the intersections of 52nd Street, 53rd Street, and 55th Street, but these queues are already exceed (sic) their capacity during peak hour on MLK Jr Way today."

Apparently UPP's traffic consultant thinks that because the intersections already exceed capacity, it's no big deal to add additional cars. We respectfully disagree.

2. Confusing, non-standard street grid alignments on narrow local roads

The Golden Gate and Longfellow neighborhoods have a number of difficult intersections that confuse even local residents. There are multiple multi-leg asymmetric intersections and skewed angled intersections (shown in Exhibits A and B) because Adeline St. cuts diagonally across the standard street grid. This creates complex, overlapping turning tracks and highly unconventional conflict points for vehicles, cyclists, and pedestrians. The intersection of 53rd St, Lowell St., and Adeline St., (shown in Exhibit A) is particularly chaotic, causing traffic traveling west on 53rd St. (toward the proposed hospital) to stop at Adeline St., make a right turn, then immediately make a left turn through the intersection of Adeline St., Lowell St., and 53rd St. (an intersection that is uncontrolled when traveling westbound). While westbound traffic on 53rd St. stops only once at this confusing intersection, 53rd St. traffic traveling east, north, or south from Lowell St. have to make two stops, then navigate free-flowing traffic on Adeline St. to continue their journey. This problematic intersection is made worse by the fact that delivery trucks, food delivery drivers, and dumpsters routinely occupy the bike lane, completely obliterating sight lines (shown in Exhibit F).

The streets in the Golden Gate neighborhood are barely wide enough to accommodate current traffic flows. In particular, 53rd St. between Gaskill St. and San Pablo Ave. frequently sees conflicts between eastbound and westbound vehicles. When large vehicles stop, free-flowing two-way passage is impossible (shown in Exhibit C). Current conditions create a physical bottleneck that would significantly impact emergency vehicle response times between North Oakland and the hospital site. 47th St. used to be an additional traffic relief valve for cars traveling from points east, but the City of Emeryville decided to install a traffic diverter that prohibits through traffic to cross San Pablo Ave. (shown in Exhibit D). As a result, the only through street (meaning a street where traffic has to pass through only one intersection to cross San Pablo Ave.) between Stanford Ave. and 40th St. is 53rd St. It can barely handle current traffic levels.

It certainly cannot handle additional hospital traffic. Drivers routinely turn right onto San Pablo Ave. from 54th and 55th streets to make a U-turn at 55th St. and travel southbound on San Pablo Ave. This requires them to cross all of the lanes of traffic on San Pablo Ave. almost perpendicular to traffic in a very small area of roadway, which is not safe for motorists, pedestrians, or cyclists.

3. Exposure of vulnerable populations to hospital cut-through traffic

This project must seriously study if these roads can realistically accommodate additional traffic, especially from such a large-scale project.

Modern consumer navigation and mapping technologies provide drivers with real-time updates to get them to their destination as quickly as possible. If a particular block of 53rd St., Stanford Ave., or 40th St. is congested, dynamic mapping and routing apps will direct traffic to other parts of our neighborhood to bypass it. This will force traffic onto other local streets that serve as primary paths to our senior center, our language immersion schools, our library, various daycares, fitness gyms, and local parks (shown in Exhibit E). Significant hospital traffic is not compatible with the very pedestrian nature of many of these neighborhood institutions.

Because of this significant cut-through traffic issue, we formally request that the Draft EIR and traffic analysis perform the same analysis on the following Oakland intersections (as outlined in Tasks 2 and 3 in the scope of work) as it does for the 79 specified Emeryville intersections:

- 53rd St. @ San Pablo Ave. (offset T- intersection)
- 53rd St. @ 48th St. (skewed intersection)
- 53rd St. @ Gaskill St. (skewed intersection)
- 53rd St. @ Lowell St. & Adeline St. (multi-leg asymmetric intersection)
- 53rd St. @ Market St.
- 53rd St. @ Genoa St.
- 53rd St. @ Martin Luther King Jr., Way
- 54th St. @ San Pablo Ave. (offset, non-through intersection; traffic cannot continuously flow on 54th St. across San Pablo Ave.)
- 54th St. @ Gaskill St.
- 54th St. @ Lowell St.
- 54th St. @ Adeline St. (offset skewed intersection)
- 54th St. @ Market St.
- 54th St. @ Genoa St.
- 54th St. @ Martin Luther King Jr., Way

4. Pavement conditions and impact to OakDOT expenditures

The Draft EIR must comprehensively analyze and model the physical deterioration of roadway pavements in adjacent Oakland jurisdictions resulting from the project's construction and operational traffic. Under CEQA, a lead agency must evaluate direct and reasonably foreseeable indirect physical changes to the environment caused by a project. The introduction of heavy vehicle traffic, ambulances, commercial delivery trucks, and hundreds of daily commuter trips will cause drivers to bypass regional highways and funnel directly through residential cut-throughs in the Golden Gate neighborhood, including 52nd, 53rd, 54th, and 55th streets.

Residential roadways are structurally engineered for significantly lower vehicle-weight baselines and lower multi-axle traffic volumes than major arterials. The addition of a share of the projected 20,000 daily vehicle trips will dramatically accelerate pavement fatigue along these narrow local streets.

Because the project is located outside of Oakland city limits, this cross-jurisdictional spillover shifts a profound operational and financial burden onto the City of Oakland. It directly strains OakDOT's Pavement Management Program and Public Works maintenance budgets, which operate under strict fiscal constraints and resource-allocation models. This project creates an inequitable environment where the applicant reaps the fiscal benefits of the development, while Oakland's local infrastructure assets are degraded, forcing OakDOT to prematurely expend local tax and bond revenues to repair structural road damage caused by a non-Oakland medical campus.

Accordingly, we request that the Draft EIR include the following studies and mitigations:

1. Pavement Life-Cycle Impact Analysis: Use a recognized pavement design life-cycle model to quantify how the projected traffic will decrease the lifespan of pavement on 53rd St., 54th St., 55th St., and surrounding North Oakland corridors.
2. Heavy Vehicle Load Modeling: Explicitly isolate and model the structural impact of heavy-duty multi-axle vehicles—including emergency ambulances, medical waste disposal logistics vehicles, and facility delivery trucks—rather than relying solely on average passenger vehicle weights.
3. Inter-Agency Mitigation Framework: Establish a binding mitigation measure requiring the applicant to enter into an infrastructure maintenance agreement or provide proportional "fair-share" financial contributions directly to OakDOT. These funds must be explicitly earmarked for the accelerated rehabilitation, resurfacing, and maintenance of the specific Oakland neighborhood streets impacted by hospital-bound cut-through traffic.

5. Overall impact on various pending and ongoing projects to North Oakland

I live at the corner of 55th and Adeline and have witnessed many accidents and near accidents at the T intersection. It's become much more congested and chaotic since the Cloud Kitchen's arrival. I do not see anything positive about adding thousands of of vehicles driving through the area. Crossing any street in the vicinity is already scary.

Sincerely,

Tisha Barros
924 55th St
tkbarros13@gmail.com

Tracy C. Lincoln
53rd Street resident and homeowner
sbclifs@aol.com
760-529-1392

September 14, 2026

To: City of Emeryville / Planning Department
Attn: Miroo Desai, AICP / Planning Manager
1333 Park Avenue
Emeryville, CA 94608
Via Email: mdesai@emeryville.org

Scoping Comments for the Environmental Impact Report/Statement (EIR/EIS) for Sutter Emeryville Medical Center Project

1. Introduction and Statement of Interest
On behalf of the residents and pet owners of the Emeryville and North Oakland neighborhood where this project is proposed , I am submitting these scoping comments regarding the potential **environmental noise and vibration impacts** of the proposed Sutter Emeryville Medical Center Project.
Our community possesses a unique demographic profile: **an exceptionally high concentration of domestic pets, including thousands of dogs and cats, multiple heavily utilized dog parks, and a dense population of indoor cats residing in multi-family buildings.**
As the lead agency determines the scope of the Environmental Impact Review (EIR/EIS), we explicitly request a comprehensive analysis of **noise and vibration impacts on domestic animals**, which represent a significant community asset and a **sensitive biological/environmental receptor group in this specific locale.**
2. Unique Baseline Conditions (The Affected Environment)
The standard baseline noise analysis must be expanded to account for the unique density of animal receptors in the project's zone of influence. We request that the draft environmental document map, and establish baselines for:

- **High-Density Pet Housing:** Identify multi-family residences within at minimum 2500 feet of the project site, accounting for the high volume of indoor cats and

dogs that remain in these structures 24/7, as well as the heightened hearing ability of these pets.

- **Designated Animal Spaces:** Establish baseline noise levels at local animal infrastructure, specifically Stanford Ave Dog Park Bark on Powell, Emeryville Dog Park on Bay St, as well as parks with designated dog areas, such as Christie and Temescal Creek Parks, and nearby veterinary clinics, dog daycare, and pet boarding facilities, as well as popular dog walking areas throughout the neighborhood, to include the neighborhood streets within a 2500 foot radius of the project site (again, based on heightened hearing of these vulnerable pets).
- **Acoustic Vulnerabilities of Pets:** Acknowledge in the baseline description that Canis lupus familiaris (dogs) and Felis catus (cats) **possess significantly broader hearing ranges than humans (dogs hear up to 45,000 Hz; cats up to 64,000 Hz, compared to the human limit of 20,000 Hz). Therefore, standard human-centric dBA weighting models are believed to underrepresent the impact on these species**.

3. Specific Potential Impacts to Be Analyzed

We request that the environmental review rigorously analyze the following potential impacts resulting from both the **construction phase** and the **operational phase** of the project:

- **High-Frequency and Impulsive Noise:** Analyze the impacts of high-frequency shrieks, backup alarms, pile-driving, and concrete cutting. Because cats and dogs are highly sensitive to high frequencies, these noises can induce severe anxiety, panic, escape behavior, and chronic stress.
- **Low-Frequency Vibration:** Assess how ground-borne vibrations from heavy equipment will affect indoor pets. Indoor cats in apartments, houses, and condos are highly sensitive to structural vibrations, which can manifest as severe behavioral issues and territorial stress.
- **Enclosed Space Echo Effects:** Analyze how noise will reverberate between buildings (the "urban canyon" effect), amplifying the acoustic distress for indoor animals who cannot escape the sound.
- **Dog Park Disruption and Safety Hazards:** Evaluate the risk of sudden, loud construction noises startling dogs in off-leash areas. Sudden acoustic triggers can cause dog fights, bolts for the exit, or severe behavioral regressions, rendering these public spaces unusable.

4. Requested Methodology

To properly capture these impacts, we request the following methodologies be employed by the project's acoustic engineers:

- **Unweighted (dBZ) or C-Weighted (dBC) Measurements:** In addition to standard A-weighted (dBA) metrics, **require the noise study to report unweighted decibel levels to capture high-frequency spikes and low-frequency vibrations that heavily impact animals.**
- **Socio-Economic and Health Impact Evaluation:** Evaluate the secondary impacts on residents. When pets experience severe noise-induced stress, it leads to sleep deprivation for owners, increased veterinary costs, and potential structural damage to apartments from distressed animals.

5. Proposed Mitigation Measures

The environmental document must consider a robust suite of mitigation measures tailored to this high-pet-density environment, including but not limited to:

- **Relocate project to a suitable area**
- **Provide payment to affected residents for soundproofing mitigations:** such as soundproofed windows, doors, and insulation.
- **Acoustic Shielding:** Requiring temporary sound blankets or solid acoustic walls around construction equipment specifically designed to block high-frequency noise trajectories toward dog parks and apartment, condo, and house windows.
- **Advanced Community Notification:** Implementing a real-time digital notification system for pet owners detailing the exact hours of high-impact noise (e.g., pile driving), allowing owners to temporarily relocate pets or use calming strategies.
- **Smart Back-Up Alarms:** Requiring the use of broadband "white noise" backup alarms on construction vehicles rather than traditional high-pitched beeping alarms.
- **Vibration Monitors:** Placing real-time vibration sensors on the foundations of the closest homes and buildings.

6. Conclusion

Due to the unprecedented concentration of companion animals in this Emeryville North Oakland neighborhood, **treating noise impacts as though the only concern is human annoyance thresholds is legally and environmentally insufficient**. We look forward to seeing a **dedicated, scientifically rigorous *sub-section* analyzing domestic animal noise impacts in the upcoming draft review**.

Sincerely,

Tracy C. Lincoln

Tracy C. Lincoln

Tracy Lincoln
53rd St. resident
sbclifs@aol.com
760-529-1392

September 14, 2026

City of Emeryville Planning Department
Attn: Miroo Desai, AICP, Planning Manager
1333 Park Avenue]
Emeryville, CA 94608
mdesai@emeryville.org

Subject: Scoping Comments for the Environmental Impact Report (EIR) – Sutter Emeryville Medical Center Project

Dear Miroo Desai:
As a resident living within the immediate project impact area of the proposed **Sutter Emeryville Medical Center project**, I am submitting this formal request during the public scoping period.

I request that the Lead Agency comprehensively evaluate the project's potential impacts on **navigable airspace and overall aviation safety** in the upcoming Environmental Impact Report (EIR), pursuant to the California Environmental Quality Act (CEQA). According to California's CEQA Appendix G, the structural, spatial, and functional safety of the helipad is evaluated under the **Hazards and Hazardous Materials section, the HAZARDS Chapter.**

The proposed project introduces a **330-foot-tall hospital tower** equipped with an **elevated rooftop helipad**. Because of its exceptional height and the operational nature of emergency medical helicopter flights, this project introduces unique hazards to the surrounding community and local airspace that must be rigorously analyzed.

Determining future flight volume for a new 17-story Regional Medical Center is a multi-step forecasting process rooted in healthcare logistics, regional trauma epidemiology, and catchment area analytics.

Sutter's initial prediction of one flight per day is a conservative baseline used routinely pre-construction of hospital helipads to keep the local residents calm. **This flight volume will obviously and naturally scale upwards as the facility matures into its intended regional medical center.**

In establishing the number of flights to evaluate, **the EIR must use** what Healthcare consultants and data analysts use: **Market Penetration and "Maturation" Curves,**

Geographical Catchment and Isochrone Analysis, Epidemiological Needs Analysis, Inter-Hospital Transfer (IHT) Elasticity. To establish reasonably accurate estimates of number of helicopter flights, the EIR must use the same criteria, and the "place holder" of one flight per day must not be used.

Additionally, I **request that the EIR specifically address and include the following** in its scope of study:

- **FAA Form 7460-1 Evaluation:** Require a full Federal Aviation Administration (FAA) Aeronautical Study under Title 14 CFR Part 77. The EIR must analyze whether the 330-foot structure constitutes a "hazard to air navigation" and ensure that the FAA issues a formal "Determination of No Hazard" before project approval.
- **Helipad Flight Path Obstructions:** Map and analyze the approach and departure paths (Imaginary Surfaces under FAA Part 77) for the new helipad. The EIR must evaluate if the 330-foot tower itself, or neighboring structures and mature trees, will obstruct these critical safety corridors.
- **Impact on Local Airports and Existing Airspace:** Analyze how the hospital's height and helipad operations will interact with existing flight paths from nearby airports, regional flight corridors, and low-altitude visual flight rules (VFR) traffic.
- **Community Safety and Overflight Risks:** Evaluate the increased risk of low-altitude aviation accidents over the surrounding residential neighborhood. The EIR should assess emergency landing procedures for helicopters failing to clear the 330-foot tower during high-wind or low-visibility conditions.
- **Construction Crane Hazards:** Analyze the temporary impacts of high-reaching construction cranes, which will likely exceed the 330-foot height of the final building, and detail necessary lighting and marking mitigation measures.
- **Visual Hazards (Lighting and Glare):** Assess the potential for high-intensity helipad lighting, beacon lights, and architectural glare from the tower to disorient pilots or negatively impact the surrounding residential neighborhood at night.

Potential Mitigation Measures include:

>Relocate this project to a safer location, away from the above-outlined dangers and hazards.

>Eliminate the Helipad from this project.

As a nearby resident, my safety and quality of life, and that of my family and neighbors, as well as countless children attending school and daycare in the neighborhood, depends on a **thorough, data-driven analysis of these aviation risks**. I look forward to reviewing these detailed studies in the Draft EIR. Please keep me informed of all future notices, public meetings, and document releases regarding this project.
Sincerely,
Tracy C. Lincoln

Outlook

Sutter NOP Comments

From Yuliya Rzad <zinguliya@gmail.com>
Date Sun 9/13/2026 12:00 PM
To Miroo Desai <mdesai@emeryville.org>
Cc Unger, Zachary <zunger@oaklandca.gov>; atlarge@oaklandca.gov <atlarge@oaklandca.gov>; ttaplin@cityofberkeley.info <ttaplin@cityofberkeley.info>; bbartlett@berkeleyca.gov <bbartlett@berkeleyca.gov>; WGilchrist@oaklandca.gov <WGilchrist@oaklandca.gov>; jrowan@oaklandca.gov <jrowan@oaklandca.gov>; planning@berkeleyca.gov <planning@berkeleyca.gov>

Miroo Desai, AICP,
Planning Manager, City of Emeryville,
1333 Park Avenue,
Emeryville, CA 94608

CC: Councilmember Zac Unger
Councilmember Rowena Brown
Councilmember Ben Bartlett
Councilmember Terry Taplin
William Gilchrist, City of Oakland
Josh Rowan, City of Oakland
Jordan Klein, City of Berkeley,
Jamie Parks, City of Berkeley

September 13, 2026

Dear Ms. Desai,

Thank you for the opportunity to provide comment on the Notice of Preparation for the SUTTER HOSPITAL MEDICAL CENTER ENVIRONMENTAL IMPACT REPORT (EIR). I write to respectfully request that the scope of the EIR includes the following transportation analysis.

We all hope that, twenty years from now, this area will be vibrant, safe, accessible & equitable for all. And the way we can achieve that is to plan for it today. Thank you for the work you're doing to ensure this new hospital campus will compliment and sustain our community.

Transportation Analysis: The City of Emeryville and surrounding communities have made substantive commitments and progress to reduce vehicle miles travelled (VMT) and expand equitable mobility options. Our transportation system is a network that neither stops nor ends at the borders of the City of Emeryville. The EIR should consider VMT, transportation, and mobility impacts within the City of Emeryville and surrounding communities.

Requests:

a. Level of Analysis: Evaluate transportation impacts to the area within a 15-minute bike ride of the proposed project area. The Metropolitan Transportation Commission (MTC) and other local, regional, and state agencies identify a 15-minute bike ride radius as a best practice in determining appropriate capital and service improvement programs for proposed projects with significant transportation demand.
b. Health and Safety: The proposed project will increase vehicle miles travelled within the project area and surrounding communities. Increased vehicle miles traveled raise the likelihood of traffic violence causing injuries and fatalities. The Transportation Analysis should identify specific roadway segments and intersections likely to be impacted by the proposed project and causing increased risk of traffic violence. This analysis should consider the high injury networks of the Cities of Emeryville, Oakland, and Berkeley. The analysis should identify specific mitigations to reduce risk and improve safety at/within these segments to or beyond existing conditions.
c. Active Transportation Planning: The transportation analysis by Fehr and Peers should evaluate impacts to existing bicycle and pedestrian infrastructure and conditions, including access to transit stops and station areas, as well as future and planned conditions. This analysis should consider the active transportation plans adopted by the Cities of Emeryville, Oakland, and Berkeley. Where the plans of any of these cities call for an enhanced study of a specific corridor within the geographic scope of the EIR, such as Powell Street and Stanford Avenue, the analysis shall assume the highest level of bicycle and pedestrian safety intervention, such as a Class IV cycle track or off-street shared-use path.
d. Level of Service: The transportation analysis by Fehr and Peers includes a level of service (LOS) analysis. This analysis should evaluate the proposed project against both existing conditions and future conditions modelling the fully built 40th Street Multimodal Project in the City of Emeryville, the San Pablo Avenue Corridor Bus Lanes and Bike Lanes Project proposed by the Alameda County Transportation Commission for the Cities of Emeryville and Oakland, and the active transportation plans of the Cities of Emeryville, Oakland, and Berkeley. The LOS analysis shall not recommend mitigations that would preclude or significantly impede the ability of a public agency to build out, operate, or maintain an existing or planned active transportation or public transportation improvement. The LOS analysis shall identify mitigations that retain or improve transit service reliability and travel times as compared to existing conditions, such as through the use of transit signal prioritization, queue jumps, dedicated lanes, or other capital and service programming. The LOS analysis shall not identify mitigations that would further increase VMT.
e. Variants: In addition to the variants identified at the August 27, 2026 EIR Scoping Session, the EIR should consider the following variants:
    i. A combination of the variants constructing a traffic diverter on 53rd Street and leasing vehicle parking spaces at the Bay Street shopping center.
    ii. A variant providing a protected bicycle facility along the extent of Hollis Avenue, consistent with the goals, objectives, and standards of the City of Emeryville Active Transportation Plan.
f. Specific Corridors: The Transportation Analysis and LOS Analysis should extend to the following corridors:
    i. 40th Street: Broadway to Shellmound
    ii. 53rd Street: Adeline to Horton
    iii. 55th Street: Telegraph Avenue to Doyle Street
    iv. Adeline Street: West Grand to Ashby BART

v. Alcatraz Avenue: Adeline to San Pablo
vi. Hollis/Folger/7th Street: Ashby Avenue through City of Emeryville
vii. San Pablo Avenue: West Grand Avenue to Ashby Avenue
viii. Stanford/Powell Avenues: Adeline to proposed project area

Respectfully,

Yuliya Rzad
5816 Fremont Street
Oakland, CA 94608

SECTION 2

COMMENTS BY PUBLIC ENTITIES

Alameda-Contra Costa Transit District

9/15/2026

Miroo Desai
Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

RE: Notice of Preparation (NOP) for Sutter Hospital Medical Center Environmental Impact Report (EIR)

Dear Ms. Desai:

Thank you for the opportunity to comment on the scope and content for the preparation of the Sutter Hospital Medical Center EIR. The 12-acre project site is bounded by Stanford Avenue to the north, Hollis Street to the east, 46th Street and 53rd to the south, and Horton Landing Park and Emeryville Greenway to the west. The project involves the proposed redevelopment of the project site into a medical campus that includes a hospital, medical office buildings, open space and circulation improvements, parking, and either an additional medical office building or housing as a project variant.

AC Transit respectfully requests consideration of the following comments:

Transit Stops & Amenities
The Project Description section of the NOP states that the proposed Sutter Emeryville Medical Center Project (project) will include both an employee shuttle and a transit shuttle from a stop location on the west side of Hollis Street. As the shuttle routes and service characteristics are identified and further developed, whether it is an expansion of Emery Go-Round shuttles and/or Sutter shuttles, please ensure that the proposed shuttle services complement the existing bus service in the area, and that the shuttle stop itself is of sufficient length to also accommodate AC Transit buses. This stop length should provide enough capacity to accommodate the lengths of the shuttles (including any dwelling shuttles), an AC Transit bus, and the safe distance needed for the shuttles/buses to pull in and out of the stop.

Additionally, the project sponsor should consider providing amenities such as transit shelters, benches, lighting, or other street furniture to promote transit usage to and from the project site.

Transit Analysis

We appreciate that the Transportation Scope of Work will include analyses on the project's transit trip generation, impacts on transit travel time (for up to 12 transit routes), and site access and circulation.

- For the transit travel time analysis, we hope that there will be close coordination with AC Transit staff to determine which transit routes will be included in the travel time analysis.
- For the Transportation Demand Management (TDM) Plan, AC Transit encourages consideration of AC Transit's EasyPass program. EasyPass is a cost-saving transit program built for workplaces, campuses, and residential communities. Participants receive unlimited rides on all AC Transit local and Transbay routes, valid at any time and on any day. Given the project's proximity to BART stations and the Emeryville Amtrak Station, as well as an expected deficit in parking spaces at full buildout of the project, participation in the EasyPass Program would help reduce vehicle dependency and support affordable transportation options for employees. To learn more about this program, you can visit https://www.actransit.org/easypass or reach out to easypassinfo@actransit.org.
- For the project team's use in analyzing the project's potential impacts on transit, please note that AC Transit's Service Standards can be found at https://www.actransit.org/policies under Board Policy 545.

AC Transit staff (Carissa Lee) will participate in the Technical Advisory Committee (TAC) for this project. We look forward to continued coordination with the City and the opportunity to provide more input on the project's transportation impacts as this effort progresses.

Thank you for your consideration of these comments. Should you have any further questions, please contact Carissa Lee at cmlee@actransit.org or me at cwang@actransit.org.

Sincerely,

Crystal Wang

Crystal Wang
Senior Transportation Planner
AC Transit
Service Development & Planning – Transit Priority Projects & Strategic Planning

ALAMEDA County Transportation Commission

1111 Broadway, Suite 800, Oakland, CA 94607 • 510.208.7400 • www.AlamedaCTC.org

September 14, 2026

Miroo Desai, AICP, Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

SUBJECT: Response to the Notice of Preparation (NOP) of the ***Sutter Hospital Medical Center Project***

Dear Ms. Desai,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the **Sutter Hospital Medical Center Draft Environmental Impact Report (EIR)**. The proposed project would redevelop an approximately 12-acre site within the City of Emeryville that is part of the larger 22-acre Emeryville Life Sciences Center Planned Unit Development/Preliminary Development Plan (PUD-3), also known as the Chiron PUD/PDP.

The project site is generally bounded by Stanford Avenue to the north, Hollis Street to the east, 46th and 53rd Streets to the south, and Horton Street, Horton Landing Park, and Emeryville Greenway to the west. The site is located within a well-connected urban area, approximately 0.2 miles from the Emeryville Amtrak Station, 1.7 miles from MacArthur BART Station, and 2.4 miles from West Oakland BART Station. It is also served by local and regional transit, bicycle facilities, and pedestrian connections, including access to the Bay Street Emeryville mixed-use development via the South Bayfront Bridge.
The proposed project consists of the redevelopment of the site into a comprehensive medical campus, including a hospital, medical office buildings, open space and circulation improvements, parking facilities, and a project variant that would include either an additional medical office building or housing. Given the scale of the proposed development and its location within a transit-rich area, Alameda CTC is particularly interested in the project's potential transportation, circulation, pedestrian, bicycle, transit, and traffic-related impacts, as well as opportunities to support safe and sustainable multimodal access to the site.

<u>Basis for Congestion Management Program (CMP) Review</u>

- It appears that the proposed project will generate at least 100 p.m. peak hour trips over existing conditions, and therefore the CMP Land Use Analysis Program requires the project sponsor to conduct a transportation impact analysis of the project on the nearby CMP roadway network. Per the NOP filing documents, the Transportation Analysis for the project's EIR will include the required CMP analysis. For information on the CMP, please visit: https://www.alamedactc.org/planning/congestion-management-program/. This transportation impact analysis may be submitted separately from the EIR as this analysis is no longer part of the CEQA requirements.

Use of Countywide Travel Demand Model

- The Alameda Countywide Travel Demand Model should be used for CMP Land Use Analysis purposes. The CMP requires local jurisdictions to conduct travel model runs themselves or through a consultant. The City of Emeryville and the Alameda CTC signed a Countywide Model Agreement on March 9, 2009. Before the model can be used for this project, a letter must be submitted to the Alameda CTC requesting use of the model and describing the project. A copy of a sample letter agreement is available upon request. The most current version of the Alameda CTC Countywide Travel Demand Model was updated in October, 2025 to be consistent with the assumptions of Plan Bay Area 2050.

Use of the Alameda County Transportation Commission Vehicle Miles Traveled (VMT) Reduction Calculator Tool

- Alameda CTC has developed a VMT Reduction Calculator Tool to assist its member agencies in complying with the requirements of SB 743 for the analysis of traffic impacts of certain land use projects under CEQA. The Tool estimates reductions in VMT derived from the implementation of Transportation Demand Management (TDM) Strategies with the project. The proposed project is partially located in an area with an average VMT per employee that is 5.41% higher than the Alameda County average. According to CEQA Guidelines Section 15064.3(b)(1), the project is presumed to have a significant impact on the transportation network.
- Alameda CTC recommends that the EIR evaluate opportunities to enhance multimodal access to the project site and reduce vehicle miles traveled (VMT) and associated impacts on the transportation network**.** The project's location within a transit-rich area, with convenient access to regional rail services, local and regional bus routes, and protected bicycle facilities, presents a significant opportunity to encourage travel by transit, bicycling, and walking for employees, patients, and visitors. Promoting these transportation options can help reduce reliance on single-occupancy vehicles and the project's impacts on the transportation system.
- The Transportation Analysis Scope of Work for the EIR indicates that the project will incorporate strategies to reduce single-occupancy vehicle travel and encourage multimodal transportation. Alameda CTC supports this approach and recommends that the EIR thoroughly evaluate the effectiveness of these strategies, identify additional transportation demand management measures where appropriate, and assess how they may reduce VMT and transportation-related impacts.

The discussion below provides additional detail regarding anticipated transportation impacts and considerations for the project.

Impacts

- Although SB 743 requires the use of VMT analysis rather than Level of Service (LOS) analysis to determine projects' transportation impacts under CEQA and automobile delay cannot be deemed a significant environmental impact, Government Code Section 65089(b) and the Congestion Management Program (CMP) Land Use Analysis continue to require jurisdictions to analyze each project's potential impacts on the CMP roadway network. The required LOS analysis on the CMP roadway network may be included in an appendix to the project EIR or as a separate document.
    - CMP Tier 1 roadway facilities in the project area include:
        - I-80
        - I-580
        - I-880
        - SR-123 (San Pablo Avenue)

    - SR-13 (Ashby Avenue)
  - For the purposes of CMP Land Use Analysis, the Highway Capacity Manual freeway and urban streets methodologies are the preferred methodologies to study vehicle delay impacts.
  - The Alameda CTC has *not* adopted any policy for determining a threshold of significance for Level of Service for the Land Use Analysis Program of the CMP. Professional judgment should be applied to determine the significance of project impacts.

- The EIR should address potential impacts of the project on Metropolitan Transportation System (MTS) transit operators.
  - MTS transit operators potentially affected by the project include: Alameda Contra Costa Transit (AC Transit), Bay Area Rapid Transit (BART), and Amtrak.
  - Transit impacts for consideration include the effects of project vehicle traffic on mixed flow transit operations, transit capacity, transit access/egress, need for future transit service, and consistency with adopted plans. See Appendix E of the 2025 CMP for more details.

- The EIR should address potential impacts of the project to people biking and walking in and near the Project area, especially nearby roads included in the Countywide High-Injury Network (HIN), the Proactive Safety Network (PSN), and the Countywide Bikeways Network as well as the major barriers identified in the 2019 Countywide Active Transportation Plan.

  - Impacts to consider on conditions for pedestrians and cyclists include effects of vehicle traffic on safety and conditions for people walking, bicycling, and rolling; site development; roadway improvements; and consistency with adopted plans. See Appendix E of the 2025 CMP for more details.

Mitigation Measures

- Alameda CTC's policy regarding mitigation measures is that to be considered adequate they must be:
  - Adequate to sustain CMP transit service standards, and/or reduce VMT below the applicable level of significance;
  - Fully funded; and
  - Consistent with project funding priorities established in the Capital Improvement Program of the CMP, the Countywide Transportation Plan (CTP), and the Regional Transportation Plan (RTP) or the Federal Transportation Improvement Program, if the agency relies on state or federal funds programmed by Alameda CTC.

- The EIR should discuss the adequacy of proposed mitigation measures according to the criteria above. In particular, the EIR should detail when proposed roadway or transit route improvements are expected to be completed, how they will be funded, and the effect on service standards if only the funded portions of these mitigation measures are built prior to Project completion. The EIR should also address the issue of transit funding as a mitigation measure in the context of the Alameda CTC mitigation measure criteria discussed above.

- Project sponsors are encouraged to discuss multimodal tradeoffs associated with mitigation measures or project elements that involve changes in roadway geometry, intersection control, or other changes to the transportation network. This analysis should identify impacts on automobiles, transit, bicyclists, and pedestrians. The Highway Capacity Manual (HCM) 2010 Multi Modal LOS

methodology is encouraged as a tool to evaluate these tradeoffs, but project sponsors may use other methodologies as appropriate for particular contexts or types of mitigations.

- The EIR should consider the use of TDM measures, in conjunction with roadway and transit improvements, as a means of attaining acceptable levels of service. Whenever possible, mechanisms that encourage ridesharing, flextime, transit, bicycling, telecommuting and other means of reducing peak hour traffic trips should be considered.

Thank you for the opportunity to comment on this NOP. Please contact me at (510) 208-7474, or Aleida Andrino-Chavez, Associate Transportation Planner, at (510) 208-7480, if you have any questions.

Sincerely,

Colin Dentel-Post
Assistant Director of Planning
cc: Aleida Andrino-Chavez, Associate Transportation Planner

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

September 15, 2026

SCH #: 2026080507
GTS #: 04-ALA-2026-01062
GTS ID: 40768
Co/Rt/Pm: ALA/580/46.158

Miroo Desai, Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

Re: Sutter Hospital Medical Center Project – Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR)

Dear Miroo Desai:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Sutter Hospital Medical Center Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the August 2026 NOP.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding
The proposed project would redevelop the project site into a medical campus including a hospital, medical office buildings, parking, open space, and circulation improvements. The project site is located between Interstates 80 and 580.

Travel Demand Analysis
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide (*link*).

Caltrans looks forward to reviewing the VMT analysis in the DEIR when it is available.

Construction-Related Impacts
Potential impacts to the State Right-of-Way (ROW) from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (*link*).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website (*link*) or contact LDR-D4@dot.ca.gov.

Sincerely,

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

CITY OF OAKLAND

DALZIEL BUILDING • 250 FRANK H. OGAWA PLAZA • SUITE 3315 • OAKLAND, CALIFORNIA 94612

Planning and Building Department
Bureau of Planning

(510) 238-3941
FAX (510) 238-6538
TDD (510) 238-3254

Sent via e-mail

September 14, 2026

Miroo Desai, AICP
Planning Manager City of Emeryville
1333 Park Avenue
Emeryville, CA 94608

mdesai@emeryville.org

Re: Response to the Notice of Preparation (NOP) of a Draft EIR for Sutter Hospital Medical Center Project in Emeryville, CA

Dear Miroo Desai:

The City of Oakland Bureau of Planning and Department of Transportation (OakDOT) has reviewed the NOP for the Sutter Hospital Medical Center Project in Emeryville. The City of Oakland concurs with the environmental resource topics identified in the NOP to be studied in the EIR.

However, staff would like to identify a number of items within the Project description that are of concern as follows:

Parking Deficit

The NOP notes an estimated on-site parking deficit of 585 parking stalls, which would account for more than 20% of the necessary parking on-site to meet demand. While project variants are proposed to address this shortage by providing shuttles to off-site locations, concerns remain that a lack of the necessary parking on-site could lead to the potential overspill of parking into Oakland neighborhoods surrounding the Project site. This could lead to the potential for additional City services in Oakland to provide for Residential Permit Parking and ongoing enforcement. In addition, there is a proposal to use the Alta Bates Sutter parking garage at the Pill Hill campus in Oakland and provide shuttle service to the Project site. What is the current capacity of those garage facilities? If current and/or future capacity is exceeded, there is concern over potential spill over into the Oakland neighborhoods surrounding the Pill Hill campus.

Traffic Diverter Variant

The NOP identifies a Project Variant that would study the inclusion of a new traffic diverter east of Hollis Street at 53rd Street. The City supports the study of this variant as it would certainly work to help address traffic to the Project site along 53rd Street, which is a residential street. However, this study should also include in depth coordination with Anna Yates Elementary and Emery High as current pick-up/drop-off issues persist along 53rd Street. Without coordination the proposed traffic diverter could potentially exacerbate this congestion and expand the issues to other local streets if measures are not taken to address the current situation and require more enforcement in the pick-up/drop-off areas on 53rd Street.

Construction Phasing Timeframe – Traffic Control

The NOP identifies a phased construction timeframe of approximately 10 years. As such, the City of Oakland recommends that a comprehensive construction management plan and traffic control plan be developed prior to any construction that ensures that construction vehicles are not using local residential streets for access to the different construction sites within the Project. We would also ask that a requirement be placed upon the applicant to require outreach and construction updates to City of Oakland residents surrounding the project site in addition to Emeryville residents.

Transportation Scope of Work

In addition to the above cited concerns, The City of Oakland OakDOT staff have reviewed the Transportation Scope of Work prepared by Fehr & Peers that was attached to the NOP. OakDOT plans, manages and operates the transportation system for the City of Oakland. As a neighboring jurisdiction, Oakland's transportation system will be affected by the significant new transportation demand that this project will create. After reviewing the Fehr and Peers Scope of Work OakDOT has the following comments:

- **Figure 1 Study Intersection Locations**:
    - We recommend adding these Oakland intersections to the list of those to be studied:
        - MLK Jr Way and CA-24 freeway on and off-ramps
        - MLK Jr Way and 55th St
        - 65th St and San Pablo Ave intersection
        - 34th St and Hollis St intersection
        - 54th St and Adeline St
        - 61st St, 62nd St and Doyle St
        - Per OakDOT Transportation Impact Review Guidelines:
            - all signalized intersection(s) with 50 or more project-related peak hour trips and existing LOS D-E-F
- **Figure 1 Study Intersections – recommended study corridors:**
    - Martin Luther King Jr Wy (40th St to 47th St)

        - future OakDOT road diet project
    - Martin Luther King Jr Wy (47th St to Adeline St)
        - (a future OakDOT paving project will remove one lane in each direction on MLK Jr Way between 47th St and 61st St)
    - San Pablo Ave corridor between Powell and Ashby
    - Stanford Ave/Powell St corridor between Horton and MLK Jr Way
    - San Pablo Ave from 40th St to Ashby Ave (per ACTC's Bus and Bike Lanes project)
    - Telegraph Ave (52nd St to Woolsey St)
        - Future OakDOT road diet + bike lanes project

- **Task 3A VISSIM Model Building and Calibration**
    - Please include the ACTC Bus & Bike Lanes project design into the analysis assumptions as this may change signal timing at intersections near the project, among other impacts.
- **Task 3C Travel Time Analysis**
    - We recommend including the ACTC Bus & Bike Lanes project scenario for the analysis of transit travel times.
- **Task 6 Parking Demand and Supply Analysis**
    - We recommend including a scenario in which some off-street parking and nearby on-street parking is priced, where appropriate.
    - Please include the nearby streets within Oakland as part of this analysis, such as 55th Street, Vallejo Street, Fremont Street and Marshall Street.
    - Consider having the project create and pay for residential parking permits (RPP) in nearby residential neighborhoods around the project, such as the streets in the previous comment. This could include Oakland residents as well, if they petition for a new RPP area. This strategy has been successfully used by Kaiser Hospital in Oakland.
- **Task 7 Site and Circulation Analysis**
    - Bicycle and Pedestrian circulation:
        - Please analyze uncontrolled pedestrian crossings on arterial and collector roadways; and
        - Bicycle boulevards and neighborhood bike routes included in Emeryville's Active Transportation Plan and Oakland's Bicycle Plan (i.e., 32nd St, 42nd St, 45th St, 53rd St, 54th St, 55th St, 61st St, 63rd St, 65th St)

- **Task 9 Plan Consistency Analysis**
    - Please include an analysis of Oakland's 2017 Pedestrian Plan and 2019 Bike Plan for consistency.
    - Please consider reviewing for consistency with Alameda County Transportation Commission's (ACTC) Countywide Transportation Plan, and the Metropolitan Transportation Commission's (MTC) Plan Bay Area 2050 (Regional Transportation Plan)
- **Task 11 Transportation Demand Management (TDM) Plan**
    - As part of the suite of employee TDM options to be analyzed, please include the "Clipper BayPass"
    - Please analyze the potential for including free AC Transit bus and/or BART trips as part of every patient visit. A similar strategy has been successfully used by the Golden State Warriors basketball team at their arena in San Francisco, where every ticket acts as a Muni pass.

Separate from the NOP, we would like to acknowledge and appreciate your outreach and offer to City of Oakland staff to participate in a Technical Advisory Committee (TAC) with Emeryville City staff to further discuss the project. The City of Oakland would like to include Peterson Vollmann from Bureau of Planning and Kerby Olsen from OakDOT staff to participate on the Committee.

If you have any questions, feel free to contact City of Oakland staff Peterson Vollmann from Bureau of Planning at pvollmann@oaklandca.gov or Kerby Olsen from OakDOT at kolsen@oaklandca.gov.

Edward Manasse
Environmental Review Officer

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
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Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

September 9, 2026

Miroo Desai
Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, CA 94608
mdesai@emeryville.org

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SUTTER HOSPITAL MEDICAL CENTER PROJECT DATED AUGUST 17, 2026, STATE CLEARINGHOUSE NUMBER 2026080507

Dear Miroo Desai,

The Department of Toxic Substances Control (DTSC) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Sutter Hospital Medical Center Project (Project). The proposed Project would redevelop the site into a medical campus to include a hospital, medical office buildings (MOBs), parking, open space, and circulation improvements. Existing surface parking on parcel 49-1558-5 and the Power Distribution Unit Building at 4595 Horton Street would be demolished. The 10-story Horton Street Garage at 4563 Horton Street would be retained as the primary parking facility, and existing Building 2/3 at 5555 Hollis Street and Building 4 at 5300 Chiron Way would be improved and converted into MOBs. The Project would also construct two new buildings and are as follows:

- Building 8 (1400 53rd Street) - an all-electric hospital of approximately 785,000 square feet and 330 feet in height, with up to 325 beds and a helipad.
- Building 1 (parcel 49-1558-5) - a building with ground-level parking, proposed with two variants: Variant 1, an MOB of approximately 55,600 square feet and 50 feet in height, or Variant 2, a multi-family residential building of approximately 129,500 square feet and 95 feet in height with up to 133 units. The DEIR will evaluate both variants of Building 1.

DTSC recommends and requests consideration of the following comments:

1. The last sentence of the first paragraph of the NOP states that the City has not prepared an Initial Study and will instead proceed directly with the preparation of an EIR. DTSC recommends reviewing historical documents stored in DTSC's database, EnviroStor, associated to the Pacific Gas & Electric Co-Emeryville site, which formerly comprised several areas related to the Project. These areas included APNs 49-1558-6, 49-1041029-1, 49-1558-4 and 49-1558-5.
2. DTSC is interested in knowing any details of the Project involving specifically APN 49-1558-6 (5555 Hollis Street), in particular if they would involve its restricted ramp area, for which a land use covenant (LUC) was recorded. Any plan that would disturb the soil or alter the cap in this area should be previously discussed with DTSC, and a soil management plan (SMP) must be prepared.
3. The Building Development and Demolition section of the Project Description includes the planned improvement and conversion of the existing Building 2/3 at 5555 Hollis Street and existing Building 4 at 5300 Chiron Way into medical office buildings (MOBs). DTSC recommends considering the land use restrictions that are currently in place for the Site, and requests to be informed in detail of every land use that is planned by the Project.

4. Table 3 describes planned uses of the different buildings of the Project. For Building 2/3, it describes hospital-related uses such as a surgical center, urgent care, MOBs and different specialty clinics. In alignment with Comment 3 above, DTSC recommends considering the restrictions set by the LUC for some of the areas of the Site.

Potential Environmental Effects:

5. Air Quality: This section states that the EIR will analyze and disclose criteria pollutants and potential health risks associated with the Project during construction and operation in accordance with the Bay Area Air District (BAAD)'s most recent air quality guidelines. DTSC requests that any air quality assessment and data related to the Site be provided both to BAAD and DTSC.

6. Hazards and Hazardous Materials: The NOP states that the DEIR will analyze the potential for hazardous materials contamination within and near the Project site. DTSC recommends assessing the chemicals of potential concern (COPCs) that have been historically related to the Site, that include polychlorinated biphenyls (PCBs), total petroleum hydrocarbons (TPHs), arsenic, lead, as well as the potential for vapor intrusion (VI) from volatile and semi-volatile chemicals.

7. If buildings or other structures are to be demolished on any Project sites included in the proposed Project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.

8. DTSC recommends all imported soil/fill material be tested to ensure all contaminants of concern (COCs) meet screening levels as outlined in DTSC's PEA Guidance Manual. Furthermore, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing soil/fill is necessary. To minimize the possibility of introducing contaminated soil/fill material, there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material is suitable for the intended land use. The sampling should include analysis based on the source of the soil/fill and knowledge of prior land use.

DTSC appreciates the opportunity to comment on the NOP of a DEIR for the Sutter Hospital Medical Center Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via the CEQA Review email for additional guidance.

Sincerely,

Dave Kereazis

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
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EAST BAY
MUNICIPAL UTILITY DISTRICT

September 10, 2026

Miroo Desai, AICP, Planning Manager
City of Emeryville
1333 Park Avenue
Emeryville, California 94608

Re: Notice of Preparation of an Environmental Impact Report for the Sutter Hospital Medical Center, Emeryville

Dear Miroo Desai:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Sutter Hospital Medical Center (Project) located in the City of Emeryville (City). EBMUD has the following comments.

WATER SERVICE

Pursuant to Section 15155 of the California Environmental Quality Act Guidelines and Sections 10910-10915 of the California Water Code, a Water Supply Assessment (WSA) will be required as the Project exceeds the threshold requirement for an assessment of water supply availability based on the amount of water this Project would require (greater than a 250,000-square-foot commercial office building). Please submit a written request to EBMUD to prepare a WSA. EBMUD requires the Project sponsor to provide future water demand data and estimates for the Project site for the analysis of the WSA. Please be aware that the WSA can take up to 90 days to complete from the day on which the request is received.

EBMUD's Central Pressure Zone, with a service elevation between 0 and 100 feet, will serve the Project. Individual units in a newly built multifamily or multi-occupancy commercial/industrial premises shall be individually metered. A main extension, at the Project sponsor's expense, may be required to serve the Project. Off-site pipeline improvements, also at the Project sponsor's expense, may be required depending on EBMUD metering requirements and fire flow requirements set by the local fire agency, Off-site pipeline improvements include, but are not limited to, replacement of existing water mains to the Project site. When the development plans are finalized, the Project sponsor should contact EBMUD's New Business Office and request a water service estimate to determine costs and conditions for providing water service to the Project. Engineering and installation of water mains, off-site pipeline improvements, and services require substantial lead time, which should be provided for in the Project sponsor's development schedule.

EBMUD designates hospitals as critical customers, assigning them the highest response priority in order to continue hospital operations and maintain the health and safety of the general public. EBMUD encourages water service redundancy and reliability, specifically for the new hospital building. EBMUD's Procedure 724 states, " ... Where possible, customers with critical needs [e.g., hospitals], may have two separate services from different mains." All new services would be at the Project sponsor's expense.

EBMUD's Standard Site Assessment Report and the Project's NOP indicate the potential for contaminated soils or groundwater to be present within the Project site boundaries. The Project sponsor should be aware that EBMUD will not install pipelines or services in contaminated soil or groundwater (if groundwater is present at any time during the year at the depth pipeline is to be installed) that must be handled as a hazardous waste or that may be hazardous to the health and safety of construction and maintenance personnel wearing Level D personal protective equipment. Nor will EBMUD install pipelines or services in areas where groundwater contaminant concentrations exceed specified limits for discharge to the sanitary sewer system and sewage treatment plants. The Project sponsor must submit copies to EBMUD of all known information regarding soil and groundwater quality within or adjacent to the Project boundary and a legally sufficient, complete, and specific written remediation plan establishing the methodology, planning and design of all necessary systems for the removal, treatment, and disposal of contaminated soil and groundwater.

EBMUD will not design pipelines or services until soil and groundwater quality data and remediation plans have been received and reviewed and will not start underground work until remediation has been carried out and documentation of the effectiveness of the remediation has been received and reviewed. If no soil or groundwater quality data exists, or the information supplied by the Project sponsor is insufficient, EBMUD may require the Project sponsor to perform sampling and analysis to characterize the soil and groundwater that may be encountered during excavation. Alternatively, EBMUD may perform such sampling and analysis at the Project sponsor's expense. If evidence of contamination is discovered during EBMUD work on the Project site, work may be suspended until such contamination is adequately characterized and remediated to EBMUD standards.

RIGHT-OF-WAY AND EASEMENTS

EBMUD owns and operates water distribution pipelines in Chiron Way and within the Project site, which provide continuous service to EBMUD's customers in the area. There is a 12-inch water pipeline in Chiron Way that traverses the Project site in EBMUD right-of-way (R/W) 4467. EBMUD also owns pipelines located in two rights-of-way that are adjacent to the proposed Project, R/W 4550 and R/W 4468. All pipelines and rights-of-way within the Project area are shown on the attached EBMUD distribution map. Any proposed construction activity in EBMUD rights-of-way would be subject to the terms and conditions determined by EBMUD including relocation of the water pipelines and/or rights-of-way at the Project sponsor's expense. No buildings or structures that could

interfere with EBMUD's full use of its rights may be placed or permitted within the right-of-way.

RECYCLED WATER

The Project is within the boundaries of EBMUD's East Bayshore Recycled Water Project. The Project will have a significant potential for recycled water demand due to its size and potential for extensive landscape irrigation. EBMUD requests that all landscape irrigation, including the parks, be plumbed separately from the on-site potable system in order to accept recycled water. A recycled water main extension, at the Project sponsor's expense, may be required to serve the Project. When the development plans are finalized, the Project sponsor should contact EBMUD's New Business Office and request a water service estimate to determine costs and conditions for providing recycled water service to the Project. Engineering and installation of recycled water mains and services require substantial lead time, which should be provided for in the Project sponsor's development schedule. EBMUD also requests that an estimate of water demand for landscape irrigation be provided in the EIR.

WASTEWATER

EBMUD's Main Wastewater Treatment Plant (MWWTP) and interceptor system are anticipated to have adequate dry weather capacity to accommodate the proposed wastewater flows from this Project and to treat such flows provided that the wastewater generated by the Project meets the requirements of the EBMUD Wastewater Control Ordinance. However, wet weather flows are a concern. The East Bay regional wastewater collection system experiences exceptionally high peak flows during storms due to excessive infiltration and inflow (I/I) that enters the system through cracks and misconnections in both public and private sewer lines. EBMUD has historically operated three Wet Weather Facilities (WWFs) to provide primary treatment and disinfection for peak wet weather flows that exceed the treatment capacity of the MWWTP. Due to reinterpretation of applicable law, EBMUD's National Pollutant Discharge Elimination System (NPDES) permit now prohibits discharges from EBMUD's WWFs. Additionally, the seven wastewater collection system agencies that discharge to the EBMUD wastewater interceptor system ("Satellite Agencies") hold NPDES permits that prohibit them from causing or contributing to WWF discharges. These NPDES permits have removed the regulatory coverage the East Bay wastewater agencies once relied upon to manage peak wet weather flows.

A federal consent decree, negotiated among EBMUD, the Satellite Agencies, the Environmental Protection Agency (EPA), the State Water Resources Control Board (SWRCB), and the Regional Water Quality Control Board (RWQCB), requires EBMUD and the Satellite Agencies to eliminate WWF discharges by 2036. To meet this requirement, actions will need to be taken over time to reduce I/I in the system. The consent decree requires EBMUD to continue implementation of its Regional Private Sewer Lateral Ordinance (www.eastbaypsl.com), construct various improvements to its

interceptor system, and identify key areas of inflow and rapid infiltration over a 22-year period. Over the same time period, the consent decree requires the Satellite Agencies to perform I/I reduction work including sewer main rehabilitation and elimination of inflow sources. EBMUD and the Satellite Agencies must jointly demonstrate at specified intervals that this work has resulted in a sufficient, pre-determined level of reduction in WWF discharges. If sufficient I/I reductions are not achieved, additional investment into the region's wastewater infrastructure would be required, which may result in significant financial implications for East Bay residents.

To ensure that the Project contributes to these legally required I/I reductions, the lead agency should require the Project applicant to comply with EBMUD's Regional Private Sewer Lateral Ordinance. Additionally, it would be prudent for the lead agency to require the following mitigation measures for the Project: (1) replace or rehabilitate any existing sanitary sewer collection systems, including sewer lateral lines to ensure that such systems and lines are free from defects or, alternatively, disconnected from the sanitary sewer system, and (2) ensure any new wastewater collection systems, including sewer lateral lines, for the Project are constructed to prevent I/I to the maximum extent feasible while meeting all requirements contained in the Regional Private Sewer Lateral Ordinance and applicable municipal codes or Satellite Agency ordinances.

WATER CONSERVATION

The Project presents an opportunity to incorporate water conservation measures. EBMUD requests that the City include in its conditions of approval a requirement that the Project sponsor comply with Assembly Bill 325, "Model Water Efficient Landscape Ordinance," (Division 2, Title 23, California Code of Regulations, Chapter 2.7, Sections 490 through 495). The Project sponsor should be aware that Section 31 of EBMUD's Water Service Regulations requires that water service shall not be furnished for new or expanded service unless all the applicable water-efficiency measures described in the regulation are installed at the Project sponsor's expense.

If you have any questions concerning this response, please contact Sandra Mulhauser, Senior Civil Engineer, Major Facilities Planning Section at (510) 287-7032.

Sincerely,

David J. Rehnstrom
Manager of Water Distribution Planning

DJR:MPS:kn
wdpd26_157_Sutter Hospital Medical Center Redevelopment Project.doc

Attachment: EBMUD Distribution Map

EAST BAY MUNICIPAL UTILITY DISTRICT

LOCATIONS ARE APPROXIMATE – NOT INTENDED FOR DESIGN PURPOSES – REQUEST AS-BUILT DRAWINGS IF NEEDED FOR DESIGN WORK

Potable Distribution System

- Potable Pipeline
- Service Lateral
- System Valve (*OL = Opens Left*)
- Check Valve
- Zone Valve
- Change of Pipe ID
- Rate Control Station
- Regulator
- Pressure Reducing Station
- Flow Meter
- Manhole
- Service Connection
- Facility
- Pumping Plant

Recycled Distribution System

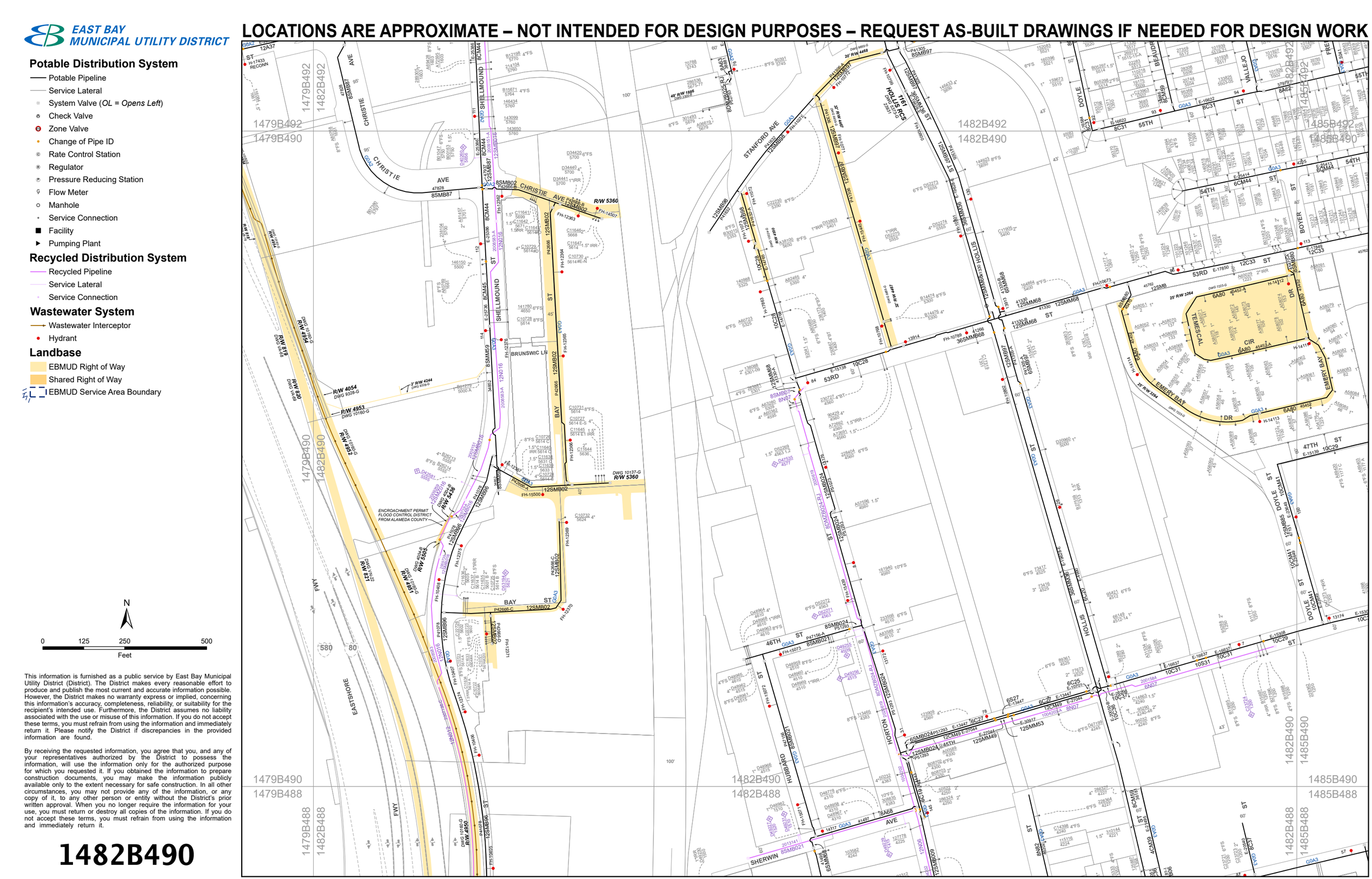
- Recycled Pipeline
- Service Lateral
- Service Connection

Wastewater System

- Wastewater Interceptor
- Hydrant

Landbase

- EBMUD Right of Way
- Shared Right of Way
- EBMUD Service Area Boundary



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1482B490

Date Printed: 5/18/2026

September 14, 2026

Miroo Desai, AICP, Planning Manager
City of Emeryville
1333 Park Avenue, Emeryville, CA 94608
mdesai@emeryville.org

RE: Sutter Hospital Medical Center Environmental Impact Report (EIR) Scoping Comments

Miroo Desai and the City of Emeryville Planning Department,

Thank you for the opportunity to submit comments on the scoping phase of the EIR preparation for the Sutter Hospital Medical Center (Notice of Preparation dated August 14, 2026). Golden Gate Bird Alliance is a non-profit organization with 7,000 members and supporters, whose mission is to inspire people to protect Bay Area birds and our shared natural environment. For over 100 years we have been a leader in bird conservation and habitat protection. We have over 40 constituents in the City of Emeryville specifically.

Our primary concerns for environmental impacts which should be studied in the EIR relate to impacts to migratory birds, including sensitive species which migrate over the Bay Area and Emeryville in significant numbers. The impacts of artificial light at night and the risk of collision with buildings should be studied in the EIR and mitigated in construction and operation. We recommend Dark Sky Approved lighting for all external and internal lighting as a necessary mitigation measure. Any glass surfaces, especially in the lower 60 feet of the buildings or where landscaping and vegetation is reflected, should be made bird-safe through etchings, fritting, decals, or other treatments, placed on the exterior surface of the glass.

The NOP correctly states that the site for the proposed hospital does not contain any breeding habitat for sensitive or listed species. We agree that nesting birds are not top priority at the site. However, the site is situated on a critical migratory pathway and the impacts to migratory birds should not be overlooked. While the area is highly urban with existing bright artificial lights, every new project, especially those as large as the proposed hospital, have the potential to worsen the impacts of artificial light on birds and insects. Impacts include increased risk of collision with buildings, increased rate of stopovers due to the skyglow effect, and impacts to insects which are a primary food source for most bird species.

Finally, we were happy to see in the NOP that the EIR will analyze potential water quality and flood impacts of the development. We ask that those impacts specifically focus on the Temescal

Creek watershed and the outflow of water into the Emeryville Crescent. The mudflats and marsh in the Emeryville Crescent are an incredibly important ecological area which does host endangered species such as the Ridgway's Rail. Additionally, the crescent mudflats provide foraging habitat for hundreds of thousands of overwintering shorebirds and gulls every year. Any changes to the water quality of the discharge from the Temescal Creek watershed and surface water into the marsh and mudflat would have serious impacts on these birds and their critical habitat.

We recognize the need for a hospital such as this in the Emeryville area and hope the project can proceed with as little impact to our environment as possible. The Bay Area is as rich in birds and other wildlife as it is populated with people. We share this natural environment and look forward to seeing your study of environmental impacts including alternatives and mitigative measures.

Thank you for your consideration,



Glenn Phillips
Executive Director

GOLDEN GATE BIRD ALLIANCE
2150 Allston Way, Suite 210 Berkeley, California 94704
phone 510.843.2222 *fax* 510.361.0140 *web* www.goldengatebirdalliance.org

Outlook

Sutter Hospital Medical Center EIR – Aviation Comments

From Sharon Grewal <sgrewal@portoakland.com>
Date Thu 9/17/2026 4:05 PM
To Miroo Desai <mdesai@emeryville.org>

Hi Miroo,
Thank you for circulating the NOP for the Sutter Hospital Medical Center EIR. From the Port of Oakland/OAK aviation perspective, we recommend that the Draft EIR include a focused evaluation of the project's aviation-related impacts, particularly given the proposed approximately 330-foot-tall building and rooftop helipad.

We recognize the importance of the helipad for patient transport and emergency medical services. At the same time, the project's height and proposed helicopter operations warrant coordination with the FAA, Caltrans Division of Aeronautics, Alameda County ALUC, and OAK to ensure compatibility with existing and future aviation operations.

We recommend the EIR address the following:

- **FAA/airspace review:** Document the status and results of applicable FAA airspace/obstruction reviews for the hospital, helipad, rooftop equipment, antennas, and temporary construction equipment, including cranes.
- **Heliport permitting:** Identify applicable Caltrans Division of Aeronautics requirements and the status of the State heliport permitting process.
- **ALUC/OAK compatibility:** Evaluate the project for consistency with applicable airport land use compatibility and airspace protection criteria and document coordination with Alameda County ALUC and OAK.
- **Helipad operations and flight paths:** Provide the proposed helipad elevation and approach/departure paths, including anticipated bearings, altitudes, routing, and relationship to OAK and other nearby aviation facilities.
- **Patient transport operations:** The NOP identifies approximately one round-trip flight per day, including nighttime patient transport. Please clarify whether this represents an average or maximum operation and identify the anticipated annual operations, helicopter types, and expected nighttime frequency.
- **Construction:** Address potential temporary aviation impacts from cranes and other tall construction equipment, including FAA determinations, marking/lighting, and height limitations.

We appreciate the City's coordination on this project and would be happy to work with the project team and EIR consultant as the aviation analysis is developed.

Thanks,
Sharon

Sharon Grewal, C.M., PMP, AICP
Aviation Project Manager
Port of Oakland

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