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Marcelo Rivera, M.D.
Chairman – Board of Directors
Palomar Pomerado Health
15255 Innovation Drive, Ste 204
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Dear Dr. Rivera:

I'm contacting you concerning:

Addendum to the Escondido Research and Technology Center Specific Plan
Final Environmental Impact Report

I'm concerned because there are significant planned changes for the ERTC as noted in the Addendum. Because of these changes a revised EIR should be prepared for the Escondido Research and Technology Center (ERTC). While only a brief few hours were available to review the Addendum here are some significant points which arose from that review:

Overview:

A 453-bed Acute Care Medical Center – Palomar Medical Center East is now planned for the ERTC. This Medical Center will be located about 900 feet from the Palomar Energy Project (PEP) – a 500 Megawatt power plant. Neither of these projects was originally included in the original Final Environment Impact Report. (FEIR) The PEP was approved by the California Energy Commission as detailed in "Application for Certification Palomar Energy Project, Escondido, CA by Palomar Energy, LLC – November 2001."

In developing and approving an EIR for the ERTC, PPH as the lead agency needs to include the existence and effects of the PEP in their work.

Examples of affected areas:

Here are specific sections of the PEP certification which are now changed by the new Medical Center:

Noise

The nearest residence was listed as 1,800 feet from the PEP. Now there will be a Medical Center with patients about 900 feet away and 9-story towers which may reinforce the sound in unanticipated ways. The new Medical Center has an emphasis on healing gardens which are negatively affected by noise.

Visual

The Medical Center is emphasizing a healing environment with plants and calming views. The PEP and associated power transmission lines will likely be clearly visible from patient's rooms in the 9-story nursing towers. The 9-story towers also represent a significant visual change to the area.

Traffic and Transportation

The new Medical Center will significantly adversely affect parking at the ERTC. The addendum proposes that 1.25 parking spaces be allocated for each hospital room. In the recent Pomerado Hospital EIR this figure was 2.00 parking spaces per room based on an extensive consultant study. Allowances for medical office building were similar in each case. For a 453-bed facility this means that 313 fewer parking spaces will be allocated at the ERTC than would be case if the Pomerado figures were used. This means that parking for the new Medical Center will affect available street parking and nearby office structures.

Based on this allocation there will be fewer parking spaces at the new Medical Center allocated to the Hospital (not the Medical Office Building which has its own parking) than there are at the existing Palomar Medical Center and its parking is considered to be unacceptable according to the PPH Master Facilities Plan.

The traffic studies in the original EIR and the addendum appear to not include the affect of the SPRINTER railway commuter line which crosses Nordahl Road just south of West Mission Rd. This railway is a significant change to traffic in the area. This railway will have a negative effect on the flow of traffic on that road which is the busiest access feeder to the ERTC site. This affect needs to be considered in any new EIR.

Pubic Health

In the PEP Application the nearest sensitive receptor was given as 1.7 miles away from the Project. The nearest medical center was 4.3 miles. There will now be a medical center 900 feet away. The Medical Center will be essentially across the street from the Project. The Medical Center will have 9-story nursing towers which will likely be above the level of the Project exhaust stacks, plus many areas below the stacks.

The PEP application only considered areas around the ERTC not areas in the ERTC. There is what appears to be a 15-foot or so tall mound all around the Medical Center site which would seem to hold pollutants. It did not appear to be included in the analysis in the PEP Application. Based on the air quality studies in the PEP Application it is very possible that pollution limits will exceed acceptable values at the new Medical Center due to the PEP. Clearly the Medical Center creates a new situation here which needs to be fully evaluated.

Overall Safety

There are number of safety issues which I believe apply. There will be helicopters landing at the Medical Center to deliver emergency patients. There are number of very tall power lines in the area. It would be very possible for a helicopter to crash either on its own or due to hitting a power line and hit the PEP. This could cause an explosion, fire

or other problem which could endanger the Medical Center. There are many examples of this type of helicopter crash in the U.S. over the past few years.

I have seen what happened when an excavator hit a good sized underground natural gas line. The results were frightening and clearly potentially very destructive for people and structures within a significant radius. The PEP has huge gas lines.

Power plants could be terrorist targets. In the event the PEP was attacked this could cause an explosion or fire or other problem which could endanger the Medical Center.

Aqueous ammonia is to be transported to the Project via trucks on a road which runs directly in front of the Medical Center. A traffic accident in front of the Medical Center involving one of these trucks could release large quantities of this hazardous material.

Large quantities of aqueous ammonia are to be stored onsite at the Project. A rupture in a storage container, either intentionally or by accident could release significant amounts of this hazardous substance. The PEP Application included reference to this hazard but didn't do the evaluation with a Medical Center located across the street.

Finally the grade level railway crossing on Nordahl Rd. will cause delays for emergency vehicles delivering patients to the new Medical Center which may be life threatening. A study of the average maximum delays at that railway crossing needs to be part of a new EIR. An overpass may be required to mitigate this issue.

Recommendation:

Due to the significant changes in the planned use of the ERTC since the original EIR a full new EIR should be prepared for the ERTC.

Sincerely,

Jeff Switzer

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