



tel: 916.455.7300 - fax: 916.244.7300
510 8th Street - Sacramento, CA 95814

June 27, 2019

SENT VIA EMAIL (skirchgessner@elkgrovecity.org)

City of Elk Grove
Development Services Department
c/o Sarah Kirchgessner, Project Planner
8401 Laguna Palms Way
Elk Grove, CA 95758

RE: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the California Northstate University Medical Center Project

Dear Ms. Kirchgessner:

These comments on the Notice of Preparation (“NOP”) for the California Northstate University (“CNU”) Medical Center Project (“project”) are submitted on behalf of the Stonelake Masters Homeowners Association (“Association”) and its members. The Association, incorporated in March 2000, is made up of 1,467 single family homes neighboring the project. The Association was formed to manage a common interest development and to provide for the administration, maintenance, preservation and architectural control of the residential lots and Common Area within the Stonelake Master Association Community. The Association’s members are those residents that would be adversely affected by the project and its significant impacts on the environment.

The overriding and primary goal of the California Environmental Quality Act (Pub. Resources Code, §§ 21000–21189.3 [“CEQA”]; see §§ 21000–21002) is the protection of the environment. It is the policy of the state to “[t]ake all action necessary” to provide citizens with “clean air and water,” “freedom from excessive noise,” “[p]revent the elimination of fish or wildlife species due to [anthropogenic] activities” and “[e]nsure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.” (Pub. Resources Code, § 21001, subd. (b)-(d).) The purpose of an environmental impact report (“EIR”) is to provide the public with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project. (Pub. Resources Code, §§

21061, 21002.1, subd. (a).) The City of Elk Grove's ("City") EIR for the project must disclose and fully analyze all of the project's potentially significant impacts.

At this time, the Association seeks clarification of specific project elements that are not described in the NOP or the project application documents. The Association has also sought to obtain documents regarding the project through the California Public Records Act process, but the City has stated the records will not be provided until after the due date for comments on the NOP.

To facilitate the public process, the City should, at a minimum, make project application materials submitted by CNU available to the public. Currently, the only materials available on the City's website are a brief project description, and incomplete project blueprints.¹ According to the City, CNU has failed to provide a complete application. Without a complete project application, clear comments on the scope of environmental review are impaired.

As the City acknowledges on its frequently asked questions ("FAQ") page for the project, the public has significant concerns over the scope of CNU's plans for the project site.² A recent Sacramento Bee article detailed email exchanges between the City and CNU officials that centered on the development of a "bio wet lab" on or near the CNU campus. (Yoon-Hendricks, *Private medical school asked Elk Grove to provide financing for \$750M hospital, emails show*, Sacramento Bee (April 5, 2019).) While the City's website expressly denies the creation of a bio-tech district, it does not mention a laboratory of any type. CNU's project plans are unclear as to all of the possible activities that would occur at or near the medical campus. The type of lab activities CNU intends to conduct on the project site, and any other type of activities that could involve dangerous chemicals or hazardous waste, must be fully disclosed for complete review to be conducted. Further, the City should disclose whether there are reasonably foreseeable future projects that would include a wet chemistry lab or a bio-tech district.

The project will purportedly be developed in three phases. However, CNU's project description, as well as the NOP, fails to provide a timeline of the project's proposed phased development. The only relevant information provided is on the FAQ

1

http://www.elkgrovecity.org/city_hall/departments_divisions/planning/current_development_projects/california_northstate_university_hospital/documents__visuals

2

http://www.elkgrovecity.org/city_hall/departments_divisions/planning/current_development_projects/california_northstate_university_hospital/frequently_asked_questions

page, which states construction would begin in 2020, and the hospital would open in 2022. The City should provide an approximate timeline for each phase of development so that the public can better understand the associated environmental impacts of each phase. The EIR should also provide detailed analysis of each phase's distinct impacts.

The Association and other members of the public have concerns about the project's impacts on the greater Elk Grove area and Stone Lakes National Wildlife Refuge ("the Refuge"). The design of the project would cause potentially significant effects. The height and reflective materials of the hospital would create a risk of bird strikes from birds in and nearby the Refuge, including Fully Protected Species such as the Greater sandhill crane. (Fish & G. Code, § 3511.) Additionally, as noted by one commenter at the June 25, 2019 scoping meeting, the reflective nature of the hospital could create a glare and heat risk for nearby residents, drivers, and those on the campus.

The project includes the addition of 3,390 parking spots, and would presumably cause a staggering increase in traffic. Along with regular traffic, emergency vehicles traveling to and from the hospital, such as helicopters, ambulances, fire trucks, and police vehicles, would create noise impacts for nearby sensitive receptors. Helicopters would additionally pose a threat to birds in and near the Refuge. All of the vehicle traffic generated by the project would cause impacts to air quality, potentially harming sensitive receptors and Refuge wildlife. The City must be cognizant of and analyze all of the project's potential impacts on natural and human environment.

Additionally, both CNU's and the NOP's descriptions do not provide adequate detail of the demolition activities required to build the project. The EIR must include sufficient information and analysis of the planned demolition of existing buildings and address the potential waste of resources caused by demolishing existing structures.

Last, the project would undoubtedly require a significant amount of energy and utility resources. CNU's and the NOP's project descriptions make no mention of the project's energy consumption nor any other infrastructure changes that may be necessary. The EIR must disclose and analyze the project's energy consumption, as well as any infrastructure activities that would be required.

City of Elk Grove, Development Services Department
Sarah Kirchgessner, Project Planner
June 27, 2019
Page 4 of 4

The Association hopes that the City will take these concerns seriously, and be forthright in its environmental review of the project. Thank you for considering these comments and please feel free to contact my office with any questions.

Very truly yours,

SOLURI MESERVE
A Law Corporation

By:



Osha R. Meserve

ORM/NS:mre