



May 13, 2019

Sarah Kirchgessner, Project Manager  
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Elk Grove, CA 96758  
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RE: California Northstate University Medical Center, PLNG 18-110

Dear Ms. Kirchgessner

Friends of Stone Lakes National Wildlife Refuge (Friends) herein offers our initial comments concerning the proposed California Northstate University (CNU) Hospital and Medical Center. We anticipate providing additional detailed comments during the environmental review and hearing phases of the project. In these comments we raise the questions of the need for and location of a level 2 trauma center hospital in a 200-year-floodplain.

The Friends are a nonprofit organization dedicated to preserving and protecting the Stone Lakes National Wildlife Refuge (Stone Lakes NWR). The Stone Lakes NWR is the single largest complex of natural wetlands, lakes and riparian areas remaining in the Sacramento-San Joaquin Delta, and provides critical habitat for waterfowl and other migratory birds of international concern, as well as a number of endangered plant and animal species. Location at the south end of a large urban area increases the Refuge's importance as a stop on the Pacific Flyway migratory route. Stone Lakes NWR and its surrounding agricultural areas are home to several special status species, including the tri-colored blackbird, greater sandhill crane, white-face ibis, long-billed curlew, Swainson's hawk, burrowing owl, giant garter snake and valley elderberry longhorn beetle.

The Stone Lakes NWR's proximity to Elk Grove and urban Sacramento provides unique opportunities for residents to experience the natural environment close to home. Yet that same proximity presents significant challenges to protecting wildlife and its habitat. It is the Friends goal to enhance those opportunities and to avoid or minimize the impacts.

The project site is located just across the freeway from the refuge boundary. The north arm of North Stone Lakes is located just yards from the project site. Waterfowl feed and roost in the lake and on surrounding lands. The proposed 12 story hospital structure represents a significant bird strike hazard to these migratory waterfowl. Emergency helicopter airlifts from the proposed helipad atop the structure will most likely approach and depart over the refuge in order to minimize noise impacts on the surrounding neighborhood. This will increase the risk and danger of bird strikes. Helicopter noise will also adversely impact the refuge. These impacts alone justify a full CEQA environmental review of the project. We will comment in more detail during that phase of the project review.

Perhaps more central questions underlying this proposed project, and deserving more immediate attention, are the larger issues of need and location. Is another hospital with a level 2 trauma center needed in the Sacramento Region, and if so, is the proposed location at the very southwest corner of the urban area within the 200-year flood plain a logical place for its location? We believe that these questions trump the fact that the proposed improvements are convenient to the applicant's current base of operation.

**We therefore urge the City of Elk Grove to seek independent input and evaluation of the need for this facility in a regional context. We urge the City to examine the proposed location in the context existing and planned hospitals and trauma centers in the region. We urge the City to assess the feasibility of the proposed project providing acute care services during a major flood event.**

These questions are often given short shrift in the analysis and hearing of major investor driven projects. Too often, hearings focus on the specifics of neighborhood and environmental impacts on the one hand, or economic benefits on the other--not fundamental questions of need. Towards that end, **we also urge the City to structure its staff analysis and, more importantly, its hearings, to ensure that adequate time, comment opportunity and deliberative attention is devoted to these important questions.**

We ask that you bring these concerns to the attention of the City Council early in the review process. We would be happy to discuss these matters in further detail with you and your staff.

Sincerely,

Chris Tooker



President, Friends of Stone Lakes NWR



Rob Burness

Chair, Conservation Committee

c: Bart McDermott, Refuge Mgr, Stone Lakes NWR  
Elk Grove City Council  
Sacramento County Board of Supervisors  
Assemblyman Jim Cooper  
Assemblyman Kevin McCarty  
Assemblyman Ken Cooley  
California Senator Richard Pan  
Congressman John Garamendi  
Congressman Ami Bera  
Robert David, Director, Office of State Health Planning and Development