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OF SACRAMENTO



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Sarah Kirchgessner, Project Manager  
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RE: Comments on Notice of Preparation of EIR for Northstate University Medical Center, PLNG 18-110

Dear Ms. Kirchgessner

The Friends of Stone Lakes National Wildlife Refuge, Environmental Council of Sacramento and Habitat 2020 herewith submit our comments in response to a Notice of Preparation of an Environmental Impact Report for the California Northstate University Medical Center Project, dated May 29, 2019.

#### **A. Increase in Bird Collisions**

Construction of a 12-story hospital with reflective glass will likely significantly increase avian mortality due to collision with the building. Significant numbers of large waterfowl, including sandhill cranes and geese, frequent the refuge at certain times of the year. Sandhill cranes are a fully protected species under California law and no take is permitted.

The EIR must:

- Evaluate proximity of building to Stone Lakes wetlands and foraging sites, in particular North Stone Lake
- Identify waterfowl and passerine utilization of refuge sites in proximity to the proposed building(s)
- Evaluate the relationship between roosting sites and foraging areas and the extent to which building location will interfere with bird movement between the two

- Consult with specialists to estimate bird mortality resulting from bird strikes. The analysis should distinguish between passerine species, migratory waterfowl and specifically sandhill cranes.

## **B. Helicopter Flight Impacts**

The presence of a heliport atop the structure will impact migratory birds in surrounding roosting and foraging habitat. Helicopter flights will likely increase bird mortality due to collisions. The potential for bird collisions increases the likelihood of a helicopter crash with potentially fatal consequences. Helicopter noise will disturb roosting and foraging birds, causing them to take flight. Geese are particularly sensitive to helicopter noise.

Please note that Federal law restricts aircraft flight elevations over national wildlife refuges. Restrictions on approaches and flight angles for arriving and departing helicopters may increase noise impacts over residential areas.

The EIR must:

- Estimate the number of flights based on full build-out of project and evaluate diurnal and seasonal variation
- Evaluate how restricted air space in the vicinity of Stone Lakes NWR will impact helicopter approach angles
- Consult with avian specialists to estimate the increase in bird mortality due to aircraft collision
- Consult with aviation specialists to assess the probability of a helicopter crash involving collision with cranes, geese and other waterfowl
- Consult with avian specialists to assess the frequency of disturbance to roosting and foraging waterfowl due to aircraft noise, and the associated impacts of the disturbances, with particular attention to disturbance to geese. The analysis should consider the cumulative impact of repeated noise stressors on bird health
- Discuss how federal restrictions on aircraft may alter noise impacts on surrounding residential neighborhoods.

## **C. Lighting Impacts**

The hospital and possibly other buildings on the site will have 24 hour lighting. Night lighting and glare not only adds to light pollution from the urban area, but can potentially impact the behavior of migrating birds.

The EIR must:

- Require sufficient detail on the hospital design to identify the intensity and glare of lighting.
- Consult with avian experts to assess the potential to impact migrating and non-migrating birds in the Stone Lakes NWR, and how impacts can be mitigated.

#### **D. Flooding**

The hospital campus is proposed to be located within a 200 year flood plain. The hospital campus is in Zone X of the FEMA rate map and is subject to the provisions of SB5 Chapter 364 requiring 200 year flood protection. The main hospital building is proposed to be located on a pad that raises the structure above the 200-year flood elevation. Other buildings, including a proposed residential dormitory, and roads providing access to the hospital, will not be elevated above the 200-year flood elevation.

Major flooding events in south Sacramento County are exacerbated by backup flow from the Mokelumne/Cosumnes River complex to the south which may not be mitigated by levees, dams or other conventional means. Climate change induced sea level rise will impact the Delta and potentially exacerbate future floods. Flood impacts will be further exacerbated if flooding occurs during a period of extreme tidal variation.

The EIR must:

- Evaluate the project for compliance with the requirements of SB5, Chapter 364
- Identify the most likely source(s) of inundation for a 200 year flood event.
- Identify the depth and duration of a 200 year flood event within the floodplain surrounding the hospital building site
- Identify the depth and duration of a 200 year flood event under mid-to-worst case sea level rise scenarios during a period of extreme tidal variation
- Discuss the safety impacts associated with access to a level 2 trauma center during various 200 year flood event scenarios
- Evaluate flood mitigation options and their effectiveness under different flooding scenarios.

## **E. Surface Runoff**

The project will potentially increase surface runoff from structures, parking and other impervious surfaces. The project's proximity to North Stone Lake within the Stone Lakes NWR raises concerns about potential impacts on North Stone Lake. A surface water retention and treatment plan should be incorporated as part of the project and not be deferred as a mitigation measure.

The EIR must:

- Quantify potential increases in surface water runoff associated with full project build-out, identify the downstream course of flow, assess runoff water quality and identify the potential to adversely impact North Stone Lake.
- Require a surface water retention and treatment plan as part of the project and evaluate its ability to mitigate adverse impacts.

## **F. Cumulative Impacts and MTP Sustainable Communities Strategy**

The Sacramento Area Council of Governments (SACOG) is required by law to adopt and update a regional Sustainable Communities Strategy (SCS) sufficient to meet carbon and air quality conformity requirements. The Project represents a major trip generator at the edge of the Sacramento urban area. It cannot be assumed that the project at build-out will have an insignificant impact on trip-making behavior and VMT, and that that impact can be accommodated cumulatively in SACOG's SCS.

The EIR must:

- Model, in coordination with SACOG and the Sacramento Metropolitan Air Quality Management District, the cumulative impact of the proposed project on VMT
- Assess the cumulative impact of the project's VMT contribution in terms of consistency with the SCS and adopted air quality plans.

## **G. Growth Inducement**

The project location is at the southwest corner of the urban area with land currently identified as permanent agriculture on the Sacramento County General Plan south of Hood Franklin Road, two miles to the south. The Elk Grove General Plan identifies growth study areas for the area south of the current sphere of influence and east of Franklin Road. The General Plan does not however designate them for urbanization. The same area is identified as important habitat for mitigation of Swainson's hawk, sandhill cranes and other listed species in the South Sacramento HCP, with a target of acquiring 1000 acres of habitat easements specifically in the area south of Elk Grove.

The EIR must:

- Identify characteristics of the project, e.g. primary employment and its multiplier effect, which would lead to increased demand for housing and commercial services
- Evaluate the stimulus effect of the project on demand for additional development in areas currently not planned for growth
- Evaluate the project's impact on raw land values and the resulting impact on implementation of the SSHCP.

#### **H. Project Alternatives**

The Project proposes a large hospital at the southwest corner of the Sacramento urban area, with a limited service area population to the west and south of the site. The project proposes a third level two or greater trauma center in the south Sacramento area. The only other similar trauma center in the metro area is located in Roseville.

The EIR must:

- Identify and evaluate the impacts of at least one alternative site in the region that would better provide patient access to trauma level emergency health care for east Sacramento County and west El Dorado County residents.
- Identify at least one alternative site on vacant land within Elk Grove City or South County that would be outside of the floodplain, have less impact on wildlife and have less growth inducing impact.

Thank you for the opportunity to comment on the scope and depth of the environmental document for this major Elk Grove project. We hope you will embrace their constructive intent and endeavor to include them in a thorough and thoughtful environmental document.

Our three organizations have a long history of advocating for good planning that protects habitat in south Sacramento County.

The Friends are a nonprofit organization dedicated to preserving and protecting the Stone Lakes National Wildlife Refuge. 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 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 Environmental Council of Sacramento (ECOS), a 501c3 organization, and Habitat 2020 are partner coalitions dedicated to protecting the natural resources of the greater Sacramento region. ECOS-Habitat 2020 member organizations include: 350 Sacramento, Breathe California of Sacramento-Emigrant Trails, International Dark-Sky Association, Los Rios College Federation of Teachers, Mutual Housing California, Physicians for Social Responsibility Sacramento Chapter, Preservation Sacramento, Resources for Independent Living, Sacramento Housing Alliance, Sacramento Natural Foods Co-op, Sacramento Vegetarian Society, SEIU Local 1000, Sierra Club Sacramento Group, The Green Democratic Club of Sacramento, and the Wellstone Progressive Democrats of Sacramento, Sacramento Audubon Society, California Native Plant Society, Friends of the Swainson's Hawk, Save the American River Association, Save Our Sandhill Cranes, Sierra Club Sacramento Group, Friends of Stone Lakes National Wildlife Refuge, and the Sacramento Area Creeks Council.

Sincerely,



Chris Tooker, President  
Friends of Stone Lakes NWR



Sean Wirth, Co-Chair  
Habitat 2020



Ralph Propper, President  
Environmental Council of Sacramento