October 13, 2020

Sarah Kirchgessner  
City of Elk Grove  
Development Services, Planning  
8401 Laguna Palms Way  
Elk Grove, CA 95758  
Email: cnuproject@elkgrovecity.org

RE:  CALIFORNIA NORTHSTATE UNIVERSITY MEDICAL CENTER PROJECT  
DRAFT ENVIRONMENTAL IMPACT REPORT (PLNG18-110)  
SMAQMD# SAC201902114

Dear Ms. Kirchgessner:

Thank you for providing an opportunity for the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) to review and comment on the Draft Environmental Impact Report (DEIR) for the California Northstate University (CNU) Medical Center project.

The Project consists of a hospital with a helistop and associated central plant and mechanical yard; an outpatient clinic; a medical office building; a dormitory adjacent to the existing School of Medicine; three parking structures, including two with accessory retail/office uses; and public gathering spaces. The Project is located on a 24.4-acre site along the western boundary of the City of Elk Grove (City) in Sacramento County, California, just east of Interstate 5 (I-5).

The Sac Metro Air District, in our role as the agency with the “…primary responsibility for the development, implementation, monitoring, and enforcement of air pollution control strategies…” in Sacramento County,¹ review and provide comments through the lead agency planning, environmental and entitlement processes with the goal of reducing adverse air quality impacts and ensuring compliance with the California Environmental Quality Act (CEQA). Staff comments follow.

1. Emissions of Criteria Air Pollutants and Greenhouse Gases
   a. Short-term Construction Emissions of Criteria Air Pollutants and Precursors: Sac Metro Air District staff note DEIR includes Mitigation Measure 3.2-2a: Implement Construction Emission Control Practices, which includes Sac Metro Air District’s Basic and Enhanced SMAQMD Construction emission control practices. Staff also note that DEIR also includes Mitigation Measure 3.2-2b: Pay Off-Site Construction Mitigation Fees and that the proposed fee structure is consistent with the Sac Metro Air District CEQA Guide².
   b. Long-term Operational Emissions of Criteria Air Pollutants and Precursors: Sac Metro Air District staff note that the operational emissions associated with

¹ California Health and Safety Code §40961
² Chapter 3 Construction-Generated Criteria Air Pollutant and Precursor Emissions; Guide to Air Quality Assessment in Sacramento County  
http://www.airquality.org/LandUseTransportation/Documents/Ch3Construction4-30-2020.pdf
the project were found to be significant and unavoidable. These emissions are partially mitigated by measure 3.2-34, which notes that the project is required to implement a Transportation Demand Management Plan (TDM) plan. The TDM plan is described in mitigation measure 3.14-1 which notes: “The City shall review and approve the Project TDM Plan prior to issuance of plan approval or building permit by the California Office of Statewide Health Planning and Development Facilities Development Division for the hospital building.” The TDM plan is also a primary component of the City-required Air Quality Mitigation Plan. Sac Metro Air District request that the City share the TDM plan with the Sac Metro Air District prior to approval.

2. Authority to Construct and Permit to Operate
   a. The following listed and potential equipment from the DEIR will need Sac Metro Air District permits:
      i. One gas fired boiler and four diesel powered emergency generators mentioned on page 3.2-20.
      ii. The project only lists 1 boiler for the central plant. In the summary description of the project on page ES-1 it also lists that an outpatient clinic, a medical office building, dormitory, and three parking structures, including two with accessory retail/offices. Do these other buildings contain boilers/water heaters 1.0 MMBtu/hr or greater? Are there boilers/water heaters used for the same process that have a combined rating greater than 1.0 MMBtu/hr? If so, these units would also need a Sac Metro Air District Permit.
      iii. Does the hospital contain any medical waste incinerators or ethylene oxide sterilizers? If so, these will need permits.
   b. In the local regulation section on page 3.2-5 the following rules may need to be included:
      i. Rule 411 NOx from boilers, process heaters and steam generators. Units with a rating of 1.0 MMBtu/hr or greater will need to meet the requirements of this rule.
      ii. Rule 414 Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU per Hour. Units less then 1.0 MMBtu/hr will need to meet the requirements of this rule.

3. Urban Heat Island Effect
   a. The urban heat island effect contributes to increased air pollution by accelerating ozone formation and increasing the use of air-conditioning for cooling. The widespread use of cool roofs, tree shading, cool pavements, and other strategies can help to lower building energy use, cool ambient air temperatures, and protect public health. For example, shaded parking spaces help reduce emissions of volatile organic compounds, an ozone precursor, from conventional internal combustion engine vehicles.
   b. For construction, we recommend (1) all new pavements, including sidewalks, roads, bike lanes, pedestrian paths, parking lots, and plazas, have an albedo of at least 0.25-0.5 and (2) all new structures or additions utilize certified cool roofs.
The California Energy Commission’s Title 24, Part 6[^3], suggests an aged solar reflectance of at least 0.63 for low-sloped roofs and at least 0.20 for steep-sloped roofs, and minimum thermal emittance of 0.75. The Cool Roof Rating Council provides a product directory of roofs[^4].

4. General Comments
   a. All projects are subject to Sac Metro Air District rules in effect at the time of construction. A list of rules that may apply to the project is pasted below. A complete listing of current rules is available at [www.airquality.org](http://www.airquality.org).

Please send any subsequent environmental documents, including the Final Environmental Impact Report to ProjectReview@airquality.org. If you have any questions, please contact me at 916-874-2694 or [j hurl@airquality.org](mailto:jhurl@airquality.org).

Regards,

-JJ Hurley

Joseph J. Hurley
Air Quality Planner/Analyst

c: Paul Philley, Program Supervisor – CEQA & Land Use Section, Sac Metro Air District
Karen Huss, Air Quality Planner/Analyst – CEQA & Land Use Section, Sac Metro Air District
Jeffrey Quok, Air Quality Engineer– Stationary Source Division, Sac Metro Air District

Attachment:
Sac Metro Air District Rules & Regulations Statement


[^4]: Cool Roof Rating Council directory of radiative performance of roofing material: [https://coolroofs.org/directory](https://coolroofs.org/directory)
Sac Metro Air District Rules & Regulations Statement (revised 10/2020)

The following statement is recommended as standard condition of approval or construction document language for all development projects within the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District):

All projects are subject to Sac Metro Air District rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

**Rule 201: General Permit Requirements.** Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from Sac Metro Air District prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the Sac Metro Air District early to determine if a permit is required, and to begin the permit application process. Other general types of uses that require a permit include, but are not limited to, dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower is required to have a Sac Metro Air District permit or a California Air Resources Board portable equipment registration (PERP) (see Other Regulations below).

**Rule 402: Nuisance.** The developer or contractor is required to prevent dust or any emissions from onsite activities from causing injury, nuisance, or annoyance to the public.

**Rule 403: Fugitive Dust.** The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

**Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour.** The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

**Rule 417: Wood Burning Appliances.** This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

**Rule 442: Architectural Coatings.** The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

**Rule 453: Cutback and Emulsified Asphalt Paving Materials.** This rule prohibits the use of certain types of cut back or emulsified asphalt for paving, road construction or road maintenance activities.

**Rule 460: Adhesives and Sealants.** The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

**Rule 902: Asbestos.** The developer or contractor is required to notify the Sac Metro Air District of any regulated renovation or demolition activity. Rule 902 contains specific requirements for
surveying, notification, removal, and disposal of asbestos containing material.

Other Regulations (California Code of Regulations (CCR))

17 CCR, Division 3, Chapter 1, Subchapter 7.5, §93105 Naturally Occurring Asbestos: The developer or contractor is required to notify the Sac Metro Air District of earth moving projects, greater than 1 acre in size in areas “Moderately Likely to Contain Asbestos” within eastern Sacramento County. The developer or contractor is required to comply with specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

13 CCR, Division 3, Chapter 9, Article 5, Portable Equipment Registration Program: The developer or contractor is required to comply with all registration and operational requirements of the portable equipment registration program such as recordkeeping and notification.

13 CCR, Division 3, Chapter 9, Article 4.8, §2449(d)(2) and 13 CCR, Division 3, Chapter 10, Article 1, §2485 regarding Anti-Idling: Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. These apply to diesel powered off-road equipment and on-road vehicles, respectively.