

## TABLE OF CONTENTS

Section	Page
1 INTRODUCTION.....	1-1
2 PROPOSED DEVELOPMENT PROJECT .....	2-1
2.1 Project Overview.....	2-1
2.2 Project Location.....	2-1
2.3 Proposed Project.....	2-2
3 CONSISTENCY WITH STATUTORY REQUIREMENTS FOR CEQA STREAMLINING.....	3-1

### Appendices

- Appendix A – Location Map, Site Plan, Massing Diagram, and Renderings
- Appendix B – Transportation Analysis
- Appendix C – LEED and Transportation Demand Management Plan Letter of Commitment
- Appendix D – Consistency with Sustainable Communities Strategy
- Appendix E – Memorandum of Understanding
- Appendix F – Greenhouse Gas Emissions Analysis
- Appendix G – Greenhouse Gas Offset Letter of Commitment
- Appendix H – Waste Management Plan
- Appendix I – Public Resources Code Sections 21183(e), (f) and (g) Letter of Commitment

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# 1 INTRODUCTION

The Project Sponsor, California Northstate University (CNU), is submitting this Application for certification of the California Northstate University Medical Center Project (hereinafter "Project") as an Environmental Leadership Development Project (ELDP), pursuant to Assembly Bill (AB) 900, the Jobs and Economic Improvement through Environmental Leadership Act of 2011, as amended effective January 1, 2018, and codified in Public Resources Code (PRC) Section 21178 et seq. Although codified within the California Environmental Quality Act (CEQA), the process for certification of a project as an ELDP is separate from all but a few of the steps required for preparing a CEQA environmental review document.

The Project is located within the City of Elk Grove (City) and, as proposed, would be consistent with ELDP requirements because it would develop a hospital and associated uses that would not result in any net additional emissions of greenhouse gases (GHGs), be built to achieve U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Gold certification or better on an infill site, provide high-quality jobs, implement a Transportation Demand Management Plan, and be consistent with the Sacramento Area Council of Governments' (SACOG's) 2036 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS).

## 2 PROPOSED DEVELOPMENT PROJECT

### 2.1 PROJECT OVERVIEW

CNU is a private, for-profit education institution that operates a pharmacy and medical college (hereinafter "School of Medicine") at 9700 West Taron Drive and an approximately 15,000-square-foot event center in the office building at 9650 West Taron Drive in Elk Grove, California.

CNU is proposing to expand its facilities and services to provide emergency and other medical-related services in the western portion of the City through redevelopment of several CNU-owned parcels adjacent to the existing CNU School of Medicine. At buildout, the Project would consist of an expanded pharmacy and medical college, a medical center (hospital) with a helistop, an outpatient clinic, a medical office building, two public parking structures with accessory retail, a dormitory, one student parking structure with rooftop sports facilities, a central plant and mechanical yard, public gathering spaces, and surface parking. The Project would employ approximately 4,000 people who could be accommodated within the planned growth of the City as set forth in the 2019 City of Elk Grove General Plan. The Project's dormitory would include 150 units to house 300 students. See **Appendix A** for the Project location, the existing and proposed site plan, a massing diagram, exterior renderings, and projected views of the Project.

### 2.2 PROJECT LOCATION

The Project site is located at 9650 and 9700 West Taron Drive in Elk Grove, California, in Sacramento County. The approximately 24.4-acre Project site, situated along the western boundary of the City, consists of 12 parcels (Assessor Parcel Numbers 132-2480-001, -002, -003, -004, -005, -007, -008, -010, and -011; 132-2160-001 and -002; 132-0460-076) owned by CNU. The site is bordered by Elk Grove Boulevard to the north, Interstate 5 to the west, West Taron Drive to the east, and the Laguna Stone Lake subdivision to the south (**Appendix A**).

The site is developed, except for one approximately 0.5-acre vacant lot on the southwest corner of Riparian Court (also known as [aka] West Taron Court) and West Taron Drive (**Appendix A**). A total of nine structures encompassing 282,246 square feet of building space currently occupy the Project site. This total includes the 109,800-square-foot, two-story School of Medicine building at 9700 West Taron Drive, the 76,000-square-foot office building at 9650 West Taron Drive currently occupied by All Data, and seven additional one-story buildings (2501 through 2619 West Taron Drive) currently occupied by a number of different uses, including eating establishments, a brewery, an animal

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hospital, the CNU Psychology College, and other commercial and retail uses. Directly adjacent to the site are a gas station, fast-food restaurants, and a church. Roadway access to the Project site is provided from West Taron Drive and Riparian Drive, while Riparian Court (aka West Taron Court) provides access to the interior of the site.

## 2.3 PROPOSED PROJECT

Development of the proposed CNU Medical Center would be guided by its District Development Plan, which would provide for overall site plan approval and establish development elements, including, but not limited to, parking, landscaping, pedestrian improvements, and other features that are common across the site (**Appendix A**). The Project would include the demolition of existing buildings and the construction of proposed uses over three phases.

### 2.3.1 Phase 1

Phase 1 would include construction of a 596,790-square-foot, 250-patient-bed hospital in the northwest corner of the Project site. The hospital would include an eight-story, 220-patient-bed tower atop a four-story, 30-patient-bed main hospital building with one basement level providing underground parking for up to 230 vehicles using a semiautomatic stacked parking system. A helicopter landing pad (helistop) and one-story mechanical “penthouse” for housing equipment would be constructed on the roof of the patient-bed tower, such that the total height of the hospital would be 13 stories. Phase 1 would also include construction of a 37,500-square-foot, two-story central plant building with a basement level providing underground parking for up to 80 vehicles. The central plant would house support equipment for the hospital and include a 15,500-square-foot exterior mechanical yard.

When completed, Phase 1 would include a total of 1,426 parking spaces, including 1,116 surface parking spaces and 310 parking spaces on the lower levels of the hospital and central plant buildings. This phase would require demolition of the buildings, totaling 170,559 square feet of retail and restaurant space, and parking lots occupying 2501, 2505, 2509/2513, and 2525 West Taron Court, and a parking lot associated with 9650 West Taron Drive.

### 2.3.2 Phase 2

Phase 2 would include construction of a second 150-patient-bed tower atop the main hospital building, an outpatient services building, a medical office building, and the first of two public parking structures. The additional eight-story patient-bed tower would increase the hospital square footage to its ultimate size of 733,290 square feet and 400 total patient beds. The 168,500-square-foot outpatient clinic would include four stories aboveground and a basement-floor parking level with 170 parking spaces. This building would contain outpatient medical services and ambulatory care. The 100,000-square-foot medical office building would include five stories aboveground and contain outpatient medical clinics and hospital administration. The first public parking structure would be 257,000 square feet in size and include four stories aboveground and one basement level. The ground floor would include approximately 51,400 square feet of retail, medical offices, and other supporting uses. The remaining three floors and basement level would provide parking for 1,500 vehicles. A semiautomatic stacked parking system would be used on the three aboveground parking levels, and the basement level would be standard parking.

Upon completion of Phase 2, the Project would include a total of 2,597 parking spaces, including 617 surface parking spaces, 480 parking spaces on the lower levels of the hospital, an outpatient clinic, and central plant buildings, and 1,500 parking spaces in the public parking structure. This phase would require demolition of the 26,040-square-foot building housing retail and restaurant uses at 2521 West Taron Court, the 374,256-square-foot commercial building occupying 9650 West Taron Drive, parking lots associated with 2521 and 2525 West Taron Court, and a parking lot associated with 9650 West Taron Drive.

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### 2.3.3 Phase 3

Phase 3 would include construction of a second public parking structure, a dormitory, and a third parking structure for medical student use with sports facilities on the roof. The second public parking structure would be 207,000 square feet and would include four stories aboveground and one basement level. The ground floor would include approximately 41,400 square feet of retail, medical offices, and other supporting uses. The remaining three floors and basement level would provide parking for 1,000 vehicles. A semiautomatic stacked parking system would be used on the three aboveground stories, and the basement level would be standard parking. The 120,000-square-foot, five-story dormitory would be constructed directly adjacent to the existing 109,800-square-foot, two-story School of Medicine and would include a 76,500-square-foot dormitory with 150 units capable of housing approximately 300 students and 43,500 square feet of additional office space for administration purposes. A 70,000-square-foot parking structure intended to provide parking and recreational facilities for medical students would also be constructed in this phase. This student parking structure would include one story aboveground and a basement level that would accommodate 200 standard parking spaces. The roof would be occupied by basketball, tennis, and volleyball courts.

With completion of Phase 3, the Project would include a total of 3,144 parking spaces, including 404 surface parking spaces, 40 parking spaces on the lower level of the central plant building, 2,500 parking spaces in the public parking structure, and 200 parking spaces in the student parking structure. This phase would require demolition of the buildings, totaling 57,969 square feet of retail and restaurant space and the parking lots occupying 2615 and 2619 West Taron Court, as well as the parking lots associated with 9700 West Taron Drive.

### 2.3.4 Other Project Improvements

The Project would also include construction of a left-turn pocket on west-bound Elk Grove Boulevard restricted for emergency vehicle use, streetscape modifications to Riparian Court (aka West Taron Court), modifications to existing parking areas, driveway improvements to West Taron Drive, and construction of new landscaped/open space public gathering areas (**Appendix A**).

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### 3 CONSISTENCY WITH STATUTORY REQUIREMENTS FOR CEQA STREAMLINING

This Application was prepared in accordance with the Governor's Guidelines for Streamlining Judicial Review under CEQA, provided on the Governor's Office of Planning and Research website and updated in January 2018 to comply with Senate Bill (SB) 734 (2016) and AB 246 (2017).<sup>1</sup> The following information (including all attachments) is submitted to show that the Project satisfies the statutory requirements for CEQA streamlining, as further set forth in the Governor's Guidelines, pursuant to PRC Section 21187 et seq.

1. **Project Land Uses.** *Information to show the project is residential, retail, commercial, sports, cultural, entertainment, or recreational in nature.*

A qualifying project must be a residential, retail, commercial, sports, cultural, entertainment, or recreational use project (PRC Section 21180(b)(1)). The Project proposes to build a hospital and support buildings, including but not limited to a dormitory, medical offices, and mixed-use parking structures as described in Section 2.3, "Proposed Project," above. As a hospital and medical campus, the proposed Project is primarily commercial in nature. Under the City's Zoning Code (Title 23 of the City of Elk Grove Municipal Code), the hospital is an allowable use (with conditional use permit) in commercial zones, as are the proposed accessory uses (including mixed use retail with parking garage, biotechnical laboratory). The proposed dormitory is a residential use. Because the Project includes retail and commercial uses, this criterion is satisfied.

2. **LEED Gold Certification.** *Information to show that the project, upon completion, will qualify for LEED Gold Certification or better. The Application shall specify those design elements that make the project eligible for LEED Gold Certification or better, and the Applicant shall submit a binding commitment to delay operating the project until it receives LEED Gold Certification or better. If, upon completion of construction, LEED Gold Certification or better is delayed as a result of the certification process rather than a project deficiency, the Applicant may petition the Governor to approve project operation pending completion of the certification process.*

The Project is being designed to achieve LEED Gold certification under the LEED rating system for Healthcare version 4. CNU agrees to a binding commitment to delay operating the Project until it receives LEED Gold certification or better (**Appendix C**). Because final LEED certification is not granted until a project is completed and operational, the Applicant will petition the Governor to approve construction and project operation pending completion of the certification process, as permitted under PRC Section 21178 et seq.

A Gold level certification target under the LEED rating system for Healthcare version 4 will encourage design and construction decisions meant to protect surrounding ecosystems; reduce energy use, water use, and GHG emissions; create healthier indoor environments; and promote environmental- and health-conscious sourcing of construction materials, all through an integrated design process.

Achieving LEED Gold certification requires obtaining at least 60 points in nine categories: Integrative Process, Location & Transportation, Sustainable Sites, Water Efficiency, Energy and Atmosphere, Materials & Resources, Indoor Environmental Quality, Innovation, and Regional Priority. The result is a positive impact on resource conservation, the built environment, and the local community.

LEED provides a level of flexibility for a project to choose the exact credits and project features. At the time of this Application, the exact LEED credits and project features that would be selected to achieve LEED Gold certification have not yet been finalized. However, some of the design features that are anticipated for contributing to the achievement of LEED Gold certification are listed below under their respective LEED categories.

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<sup>1</sup> Governor's Office of Planning and Research, Governor's Guidelines for Streamlining Judicial Review under the California Environmental Quality Act Pursuant to AB 900 (Chapter 352, Statutes of 2011), available: [http://opr.ca.gov/docs/20190412-AB\\_900\\_Guidelines-Updated-April-2019.pdf](http://opr.ca.gov/docs/20190412-AB_900_Guidelines-Updated-April-2019.pdf). Accessed September 9, 2019.

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**Integrative Process**

- ▶ The design team studied energy and water strategies during early design phases and held a 4-hour integrated design team charrette, including the architect, owner, LEED consultant, and designers from lighting, civil, landscape, and structural scopes of work.

**Location & Transportation**

- ▶ The Project is located on a previously developed site.
- ▶ The campus will provide bicycle storage and shower facilities.
- ▶ Parking for the new building will have preferred parking areas for electric vehicles and charging infrastructure. This would include 166 electric vehicle parking spaces with chargers.

**Sustainable Sites**

- ▶ The sponsor plans to offset the development area with an off-site habitat protection project.
- ▶ Low-impact development rainwater management strategies will be used to manage runoff from the developed site for the 95th percentile of regional or local rainfall events.
- ▶ Rooftops and landscaping will use light-colored materials meeting solar reflectance and low albedo requirements to reduce heat island effects.
- ▶ Exterior lighting will be directed downward and shielded to prevent excessive light pollution.
- ▶ The new building includes access for patients, visitors, and staff to outdoor landscaped areas that serve as places of respite.

**Water Efficiency**

- ▶ Reduction of water use by 30–40 percent compared to a typical healthcare development will be achieved through the use of low-flow fixtures, cooling tower efficiency, and drought-tolerant landscaping.
- ▶ Water metering to track highest demand end uses will help maintenance and operations staff detect malfunctions.

**Energy and Atmosphere**

- ▶ Reduction of energy use by 7 percent compared to a typical healthcare development will be achieved through the use of higher-efficiency condensing boilers, variable frequency drives cooling tower fan controls, light-emitting diode (LED) lighting, and other energy conservation measures.
- ▶ Integrated rooftop photovoltaic panels will be used to produce on-site renewable energy.
- ▶ Enhanced commissioning will be used to verify installed systems are working as intended upon construction completion and start-up of operations.

**Materials & Resources**

- ▶ Construction and demolition waste management strategies will be used to divert at least 50 percent of total construction and demolition materials from landfills.
- ▶ Whole building life-cycle assessment will be conducted to help identify strategies to reduce environmental impacts embodied in materials, such as reducing the amount of cement in concrete.
- ▶ Several building product disclosure documents will be included in the materials specifications.
- ▶ All LED lighting eliminates potential mercury contamination, while lead, copper, and cadmium will be avoided except where necessary for radiation and magnetic resonance imaging (MRI) shielding.
- ▶ Partitions, casework, and spaces will be designed for future flexibility.

**Indoor Environmental Quality**

- ▶ Low-emitting materials will be installed.
- ▶ Indoor air quality will be regularly tested.

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- ▶ High level of individual controls will be used to provide lighting and thermal comfort for patients and staff.
  - ▶ High number of patient rooms will offer quality views.

#### **Innovation**

- ▶ The Project team will select many credits from among the Innovation Catalog, Pilot Credits Catalog, or other innovative project design or construction achievements to improve environmental performance.

#### **Regional Priority**

- ▶ Extra points awarded for strategies that warrant extra consideration, due to a project design addressing local stresses on the environment, include:
    - Sourcing of raw materials
    - Rainwater management
    - Outdoor water use reduction
    - Indoor water use reduction
3. **Transportation Efficiency.** *Information to show the project will achieve at least 15 percent greater transportation efficiency, as defined in Public Resources Code section 21180(c), than comparable projects. The Applicant shall provide information setting forth its basis for determining and evaluating comparable projects and their transportation efficiency, and how the proposed project will achieve at least 15 percent greater transportation efficiency. For residential projects, the applicant shall also submit information demonstrating that the number of vehicle trips by residents divided by the number of residents is 15 percent more efficient than for comparable projects. For the purposes of this provision, comparable means a project of the same size, capacity and location type.*

The AB 900 Transportation Analysis for the Project provides detailed trip generation calculations and transportation efficiency analysis of the existing development on the Project site, the proposed Project, and a comparable project. The AB 900 Transportation Analysis is attached to this Application as **Appendix B** and is summarized below.

#### **Project Elements**

The Project site is surrounded by an extensive bicycle and pedestrian network and is close to existing transit services. West Taron Drive and the other roadways in the vicinity of the Project site all provide pedestrian amenities, including sidewalks, crosswalks, and curb ramps. Additionally, the major roadways in the vicinity of the Project site (i.e., West Taron Drive and Elk Grove Boulevard) provide continuous Class II bike lanes, thus providing bicycle connectivity to the surrounding neighborhoods and the City as a whole.

Elk Grove Transit (e-Trans) operates seven bus routes and 10 bus stops located within one-quarter mile of the Project site (i.e., 66, 70, 151, 152, 153, 157, Wknd). Bus stops are located directly adjacent to the Project site along West Taron Drive, and along the surrounding roadways of Riparian Drive, Elk Grove Boulevard, and Harbour Point Drive.

The City adopted the Climate Action Plan: 2019 Update in February of 2019. Consistent with the requirements of the City, the Project could be required to develop a Transportation Demand Management (TDM) Plan. Climate Action Plan Measure TACM-3 (Intercity Transportation Demand Management) focuses on the implementation of TDM strategies to reduce the use of single-occupancy vehicle trips, with a target of achieving a 15-percent reduction in local commute traffic. To aid the development of TDM plans, the City developed the City of Elk Grove Transportation Demand Management Plan Guidelines (TDM Plan Guidelines). These guidelines identify TDM measures by category that include marketing and promotion, bike facilities, transit benefits, commuter benefits, and parking facilities. The TDM Plan Guidelines outline the requirements for each TDM plan and identifies the following for each TDM measure:

- ▶ **Measure Requirements** – describes the transportation amenity being provided, the amount/frequency of the amenity, and the property owner's responsibilities. Each TDM measure is assigned a point value between 1 and 5. The higher the value, the more effective the measure is at reducing vehicle travel

- Compliance Requirements – identifies the required actions and obligations of the applicant or property owners for compliance with the TDM measure during the development review phase of a project
- TDM Plan Annual Progress Report – identifies the annual reporting requirement for the property owners' TDM coordinator, which includes the number of employees participating in the plan (i.e., by measure) and the commute mode share of employees, along with other performance measures that demonstrate performance

TDM plans shall include all required measures and a set of optional TDM measures that total a minimum of 10 points.

The Project applicant has committed to the development and implementation of a TDM Plan based on the TDM Plan Guidelines (**Appendix C**). **Table 1** summarizes the Project-specific measures that would be incorporated into the TDM Plan. More information on the proposed TDM measures and compliance requirements are provided in **Appendix B**.

**Table 1 Proposed Project TDM Plan**

TDM Category	TDM Measure	Required	Optional	Measure Points
Marketing and Promotion	Transportation Marketing Services	X		-
Bike Facilities	Short-Term Bicycle Parking		X	1
	Long-Term Bicycle Parking		X	2
	Improved Access to Bike Network		X	1
	Showers and Locker Rooms		X	3
On-Site Amenities	On-Site Cafe		X	3
Transit	Subsidized Transit Passes		X	3
Commuter Benefits	Shuttle Bus Service		X	5
	Carpooling Program		X	3
	Guaranteed Ride Home		X	4
Parking Facilities	Parking Cash Out Program		X	3
Total				28

Source: Fehr & Peers 2019

As shown in **Table 1**, consistent with the TDM Plan Guidelines the proposed Project would include all required TDM measures and would achieve an additional 28 points based on the optional TDM measures to be implemented. As detailed in the AB 900 Transportation Analysis, the proposed TDM Plan could achieve a range of overall reduction between 4 percent and 31 percent for the Project as a whole. Based on this evaluation, the Project commits to a minimum 30-percent reduction (15-percent reduction in addition to City TDM requirements) applied in the comparison of scenarios below is reasonable and achievable. In order to ensure the effectiveness of the TDM Plan, the applicant has committed to the monitoring of the program's performance to ensure that a 45-30 percent or greater reduction in trips is achieved (**Appendix C**).

In addition to the TDM measures detailed in **Table 1** above, and consistent with the reporting requirements detailed in the City of Elk Grove TDM Plan Guidelines, the applicant shall be subject to annual reporting and monitoring requirements to ensure that the TDM Plan and all the associated measures are being implemented. The CNU TDM coordinator is required to submit annual progress reports on implementation of the TDM Plan beginning one year after the date of TDM Plan approval by the City. If the responsible party fails to submit an annual report demonstrating implementation of the TDM Plan within sixty days following the established date for annual report submittal, an administrative citation will be issued pursuant to Elk Grove Municipal Code Chapter 1.12. The required items to be included in the Annual Progress Report are:

1. Contact information of TDM coordinator
2. Sample of marketing materials provided to new employees about the TDM program

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- [3. Number of employees participating in each TDM measure offered to employees](#)
- [4. Commute mode share of employees at the project site](#)
- [5. Other information demonstrating implementation of specific TDM measures](#)

**Comparison of Scenarios**

As detailed in PRC Section 21180(c), a project must demonstrate that it will achieve at least 15 percent greater transportation efficiency than comparable projects. Transportation efficiency is defined as the number of vehicle trips made by employees, visitors, or customers of the residential, retail, commercial, sports, cultural, entertainment, or recreational use project divided by the total number of employees, visitors, and customers. For the purposes of this analysis, the transportation efficiency of the proposed Project is compared to that of the existing development and a comparable project. A comparable project is defined as a project of the same size, capacity, and location type.

The number of daily trips generated by each of the three distinct scenarios (i.e., existing development, proposed Project, and comparable project) was calculated using trip rates published in the Institute of Transportation Engineers (ITE) 10th Edition Trip Generation Manual, and trip reductions were applied to the proposed Project consistent with the proposed TDM Plan. The comparable project for the purposes of this analysis is defined as the proposed Project without the implementation of the proposed TDM Plan. Detailed trip generation estimates are provided in **Appendix B**.

The number of employees, visitors, and customers was derived using a combination of data including information provided by CNU, trip generation, and average vehicle occupancy rates. Detailed employee, visitor, and customer estimates are provided in **Appendix B**.

The daily trip generation estimates, and the number of employees, visitors, and customers, were used to determine the transportation efficiency for the existing development, the proposed Project, and the comparable project. **Table 2** shows the results of the transportation efficiency analysis as detailed in the AB 900 Transportation Analysis attached as **Appendix B**.

**Table 2 Transportation Efficiency**

Development Scenario	Daily Trips	Employees, Visitors and Customers	Transportation Efficiency Ratio	Percent Change (Existing/Comparable)
Existing Development	5,808	3,399	1.71	N/A
Comparable Project (No TDM Reduction)	21,106	14,728	1.43	N/A
Proposed Project (With 15% TDM Reduction)	17,940	14,728	1.22	29%/15%

Source: Fehr & Peers 2019

As identified above, the City already requires a 15 reduction in local commute traffic that would apply to comparable projects located in the City. As shown, with implementation of the proposed TDM Plan, the proposed Project will commit to at least a 30 percent transportation efficiency to achieve at least 15 percent or greater transportation efficiency than the a comparable project located in the City.

**4. Infill Site in an Urbanized Area.** *Information to show that the project is located on an infill site as defined by Public Resources Code Section 21061.3, and in an urbanized area, as defined by Public Resources Code Section 21071.*

In order to receive AB 900 certification, the Project must be located on an infill site, as well as located in an urbanized area. An infill site includes a "site [that] has been previously developed for qualified urban uses" (PRC Section 21061.3(b)). "Qualified urban use" means any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses" (PRC Section 21072). The Project site is located on an infill site surrounded by existing retail and commercial uses consisting of various retail stores and fast food establishments. Because these uses are considered commercial and retail uses, they are qualified urban uses within the meaning of the PRC. Accordingly, because the Project would be replacing these uses, the Project location is a valid infill site.

The Project site is also located within an urbanized area. An urbanized area includes "[a]n incorporated city that...[h]as a population of at least 100,000 persons" (PRC Section 21071[a][1]). The Project site is located within the western

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portion of the City, which currently has a population of over 171,000 people, and was incorporated in 2000. Accordingly, the Project site is located in an urbanized area. The Project will replace existing urban uses at 9650 and 9700 West Taron Drive, and 2501, 2505, 2509, 2513, 2521, 2525, 2615 and 2619 West Taron Court in the City—an urbanized area. Accordingly, it meets the definition of an infill site pursuant to PRC Sections 21061.3 and 21071, which support the Project's AB 900 Certification.

5. **Consistency with Sustainable Communities Strategy.** *Information required by Public Resources Code section 21180(b)(1) is available for projects within a metropolitan planning organization for which a sustainable communities strategy or alternate planning strategy is in effect. For the purposes of this provision "in effect" means that the sustainable communities strategy or the alternative planning strategy has been adopted by the metropolitan planning organization, and that the Air Resources Board has accepted the metropolitan planning organization's determination that the sustainable communities strategy or alternative planning strategy meets the adopted greenhouse gas reduction targets and is not the subject of judicial challenge.*

SB 375 was adopted by the Legislature in August 2008 and signed into law by the Governor in September 2008. This legislation links regional planning for housing and transportation with the GHG reduction goals in AB 32. Each Metropolitan Planning Organization (MPO) is required to adopt a Sustainable Communities Strategy to encourage compact land development to reduce passenger vehicle miles traveled (VMT) and vehicle trips so that the region will meet targets established by the California Air Resources Board (CARB) for reducing GHG emissions.

In September 2010, CARB adopted regional GHG targets for passenger vehicles and light trucks for the years 2020 and 2035 for the various MPOs in California. The proposed Project is within the jurisdiction of SACOG. The GHG emissions reduction target approved by CARB for the SACOG region under the current regional transportation plan/sustainable communities strategy is a 16 percent per capita GHG reduction below 2005 levels by 2035.

SACOG released the MTP/SCS on February 18, 2016. The MTP/SCS supports the Sacramento Region Blueprint, which implements smart growth principles, including housing choice, compact development, natural resource conservation, use of existing assets, quality design, and transportation choice, and achieves the 16 percent GHG emissions reduction target set by CARB.

Upon the request of a lead agency, the applicable MPO may provide a consistency determination with the applicable Regional Transportation Plan/Sustainable Communities Strategies. In response to the City's request for a consistency determination, SACOG has determined that the Project is consistent with the MTP/SCS (**Appendix D**). SACOG concurs that the Project is in the Established Community type in the 2016 MTP/SCS, which forecasts about 1,800 new housing units and 8,135 new employees. The MTP/SCS anticipates a range of residential and employment uses within the Established Community, including commercial, office, industrial, and public development. Because the Project includes a hospital and medical center, which are generally considered public and office uses, it is consistent with the assumptions of the Established Community type, including the MTP/SCS assumption that a new hospital would be built, resulting in an increase in medical employment in the City.

The Project is also consistent with MTP/SCS policies within the metrics and growth forecast assumptions of the MTP/SCS. The forecast for this Project is based on the City's land use plans and policies, as well as an assessment of jobs-housing balance and the City's continued efforts to increase employment in the City. Increasing employment within the City, which is currently housing-rich, is essential to the success of the Blueprint Preferred Scenario and the MTP/SCS. One of the essential steps to achieving the transportation, air quality, and other quality of life benefits outlined in the Blueprint Preferred Scenario, the adopted 2016 MTP/SCS, and the draft 2020 MTP/SCS, includes relying on communities such as the City to achieve a better jobs-housing balance, which reduces VMT and GHG emissions by providing more job opportunities for Elk Grove residents. Thus, SACOG provided their determination that the Project was consistent with the applicable MTP/SCS.

6. **Multi-Family Residential Project.** *If the project is a multi-family residential project, evidence that (1) private vehicle parking spaces are priced and rented or purchased separately from dwelling units; or (2) the dwelling units are subject to affordability restrictions that prescribe rent or sale prices, and the cost of parking spaces cannot be unbundled from the cost of dwelling units.*

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The Project does not include a multi-family residential component but does provide a dormitory facility for CNU students only. This section is not applicable to the Project.

**7. Minimum Investment.** *Information establishing that the project entails a minimum investment of \$100 million in California through the time of completion of construction.*

The proposed Project includes development of a 400-bed, 733,290-square-foot hospital with a helistop, an outpatient clinic, medical office building, two parking structures with accessory retail, a dormitory, one parking structure with rooftop sports facilities, expansion of the existing School of Medicine administration building, a central plant and mechanical yard, public gathering spaces, and surface parking. Construction would occur in three phases, each involving demolition and construction of new buildings and structures. Phase 1 is expected to be complete in 2023, with Phase 2 to follow in 2028, and Phase 3 by 2032. Over the course of the nearly 10-year time period for completion of all Project-related construction, the Project is expected to significantly exceed the minimum investment of \$100 million described in PRC Section 21183(a).

The Project would have expended over \$600 million in construction costs by the time construction of Phase 1 alone is complete, which includes employment of between 443 and 660 workers for demolition and construction of the Phase 1 structures, which is expected to occur over approximately 30 months. In addition, once complete, Phase 1 would provide jobs for 1,140 permanent hospital employees who would fill a range of jobs including 420 high-paid, highly skilled nursing positions and 180 high-paid, highly skilled physician positions. Project completion at Phase 3 is anticipated to generate approximately 4,000 jobs. Thus, the Project would exceed the minimum investment of \$100 million with completion of Phase 1 construction alone.

**8. Prevailing Wage and Living Wage Commitments.** *Information establishing that the prevailing and living wage requirements of Public Resources Code section 21183(b) will be satisfied.*

PRC Section 21183(b) requires that a project to be certified by the Governor must create “high-wage, highly skilled jobs that pay prevailing wages for construction jobs and living wages and provide construction jobs and permanent jobs for Californians, and help reduce unemployment.” PRC Section 21183(b) defines “jobs that pay prevailing wages” as “all construction workers employed in the execution of the project will receive at least the general prevailing rate of per diem wages for the type of work and geographic areas as determined by the Director of Industrial Relations pursuant to sections 1773 and 1773.9 of the Labor Code.”

As stated above, the Project would create high-wage jobs for highly skilled laborers, both during construction and during operation. Approximately 2,280 permanent jobs would be created upon completion of all phases, which would help reduce unemployment. Up to 660 construction workers are expected to be employed during the 30-month construction period estimated for Phase 1. The Applicant has entered into a Memorandum of Understanding (**Appendix E**) dated August 21, 2019, with the Northern California Carpenters Regional Council and its Affiliated Unions to enter into a Letter of Intent for the construction of the proposed Project. The Applicant has committed to retaining a general contractor for construction that is a signatory to the Carpenters Master Agreement for Northern California, which includes prevailing wage requirements.

**9. Greenhouse Gas Analysis.** *Information establishing that the project will not result in any net additional greenhouse gas emissions. This information is subject to a determination signed by the Executive Officer of the Air Resources Board that the project does not result in any net additional greenhouse gas emissions, following the procedures set forth in section 6 of the Governor’s Guidelines.*

PRC Section 21183(b) requires that a project demonstrate that it will not result in any net additional GHG emissions. CARB must review the analysis of GHG emissions from construction and operation of the Project. The analysis, provided in **Appendix F**, presents the technical methodology for and results of quantifying the GHG emissions from the existing land uses at the Project site, and the construction and operation-related GHG emissions of the Project by phase (as identified in Section 2.3, “Proposed Project,” above).

The baseline for the analysis of the Project is the GHG emissions from the existing land uses at the Project site. Annual GHG emissions associated with the existing uses would be 9,337 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) per year. Project-generated emissions were calculated annually during construction phases, with operation

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of earlier phases overlapping with later construction phases. Construction was assumed to occur over a 10-year buildout period and operational emissions were calculated for 2023 through 2060 to account for a 30-year lifetime for each of the three phases of operation.

Total construction-generated GHG emissions would be 8,273 MTCO<sub>2e</sub>. Total operation-related emissions would be 1,370,530 MTCO<sub>2e</sub> over the Project's operational lifetime. The net increase in GHG emissions over the Project's lifetime (removing the annual baseline emissions) would be 997,058 MTCO<sub>2e</sub>. The incorporation of GHG reduction measures such as on-site solar photovoltaics, purchased renewable electricity, electric vehicle charging, and the TDM Plan would reduce the project's net increase to 527,983 MTCO<sub>2e</sub>. The remaining operational emissions, combined with construction-generated emissions, would be offset through the purchase of carbon credits, as specified in the letter of commitment provided in **Appendix G**.

10. **Waste Recycling.** *Information establishing that the project will comply with the requirements for commercial and organic waste recycling in Chapters 12.8 (commencing with Public Resources Code section 42649) and 12.9 (commencing with Public Resources Code section 42649.8), as applicable.*

California has had statutory and regulatory requirements related to solid waste recycling for well over 10 years requiring local governments to reduce solid waste in landfills with waste diversion programs. The two more recent statutes, in Chapters 12.8 and 12.9 of Division 30 of the PRC related to waste management, require recycling of solid waste and organic waste. Chapter 12.8 requires that businesses and multi-family residential buildings with five units or more that generate more than four cubic yards of solid waste per week source-separate their solid waste and subscribe to some kind of recycling service consistent with local ordinances or state regulations. Chapter 12.9 requires that businesses generating over specified amounts of organic solid waste per week arrange for recycling services for that organic solid waste, and also requires that if the state has not reached a reduction of 50 percent below the 2014 level of disposal of organic waste by 2020, businesses that generate more than two cubic yards of solid waste per week must source-separate and arrange for recycling of organic solid waste. These statutes also require local jurisdictions to establish a commercial solid waste recycling program if they did not already have one as of July 2012, and an organic solid waste recycling program by January 2016 if they did not already have one.

The proposed Project will be subject to these statutory requirements and has prepared an Integrated Waste Management Plan to comply with the requirements of the Sacramento Regional Solid Waste Authority, and any other applicable local recycling and composting ordinances (**Appendix H**). **Appendix H** also contains recycling requirements of the Sacramento Regional Solid Waste Authority set forth in Chapter 4.01 (Business Recycling, Non-Residential Property Recycling, Multi-Family Property Recycling, and Single Family Residential Property [Property Managed by an Association or Other] Recycling).

11. **Commitments Regarding Pub. Res. Code section 21183(e), (f), and (g).** *Information documenting a binding agreement between the project proponent and the lead agency establishing the requirements set forth in Public Resources Code section 21183(e) (all mitigation measures will be conditions of approval and enforceable, and environmental mitigation measures will be monitored and enforced for the life of the obligation), (f) applicant will pay costs of repairing the record of proceedings.*

Written acknowledgement from CNU containing commitments regarding PRC Sections 21183(e), (f) and (g) is included as **Appendix I**. The Applicant is committed to complying with all Mitigation Monitoring and Reporting Program measures from the EIR that are included as conditions of approval and are fully enforceable by the City. The Applicant agrees to pay the costs for hearing by the Court of Appeal, and will pay the costs of preparing the record of proceedings.