

# Final SUPPLEMENTAL ENVIROMENTAL IMPACT REPORT

October 2022  
SCH No. 2022020590

Prepared for:

CITY OF ROSEVILLE  
PLANNING DIVISION  
311 Vernon Street  
Roseville, CA 95678

CONTACT:

Kinarik Shallow  
Associate Planner



## Kaiser Permanente Roseville Medical Center Inpatient Bed Tower Project

Prepared by:

**DUDEK**

1102 R STREET  
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Final Supplemental EIR (SCH 2022020590)

# **Kaiser Permanente Roseville Medical Center Inpatient Bed Tower Project**

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**OCTOBER 2022**

*Prepared for:*

**CITY OF ROSEVILLE PLANNING DIVISION**

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Roseville, California 95678

*Contact: Kinarik Shallow, Associate Planner*

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# 1 Introduction

## 1.0 Introduction

This Final Supplemental Environmental Impact Report (Final SEIR) contains the public and agency comments received during the public review comment period for the Kaiser Permanente Roseville Medical Center Inpatient Bed Tower Project (proposed Project or Project) Draft Supplemental EIR (Draft SEIR).

The EIR is an informational document intended to disclose to the Lead Agency (i.e., the City of Roseville (City)) and the public the environmental consequences of approving and implementing the Project. All written comments received during the Draft SEIR public review period of July 22 through September 6, 2022 are addressed in this Final SEIR. During the public review period, the City received a total of two comment letters from public agencies. No comments were received from organizations or the public.

The responses in this Final SEIR clarify, correct, and/or amplify text in the Draft SEIR, as appropriate.

## 1.1 Background

In accordance with CEQA, the City released a Notice of Preparation (NOP) on February 25, 2022 for the required 30-day review period. The purpose of the NOP was to provide notification that a Supplement to the 2004 Kaiser Permanente Roseville Medical Center Expansion Project Environmental Impact Report (2004 Expansion Project EIR - SCH no.2003062014) was being prepared for the Project to evaluate proposed changes to what was previously evaluated in that document and to solicit guidance on the scope and content of the Project's Supplemental CEQA document. The Draft SEIR was circulated for public review and comment for a period of 45 days from July 22 through September 6, 2022.

The comments and responses that make up this Final SEIR, in combination with the Draft SEIR, constitute the SEIR that will be considered for certification by the City Planning Commission and the City Council.

## 1.2 CEQA Requirements

The contents of a Final SEIR, which are the same as for an EIR, are specified in Section 15132 of the CEQA Guidelines, which states that a Final EIR shall consist of:

- a) The Draft EIR or a revision of the Draft.
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency.

The Lead Agency must provide each agency that commented on the Draft SEIR with a copy of the Lead Agency's response to their comments a minimum of 10-days before certifying the Final SEIR.

## 1.3 Use of the Final SEIR

The Final SEIR serves as the environmental document to inform the Lead Agency's consideration of approval of the proposed Project, either in whole or in part, or one of the alternatives to the Project as discussed in the Draft SEIR. The analysis of potential Project alternatives in Chapter 6, "Alternatives of the 2004 Expansion Project EIR," is applicable to the proposed Project because the proposed Project would not result in any new or potentially significant Project level impacts. The City's 2035 General Plan EIR concluded that the cumulative increase in light and glare with buildout would be a significant and unavoidable impact. The Medical Center Campus buildout was assumed in the General Plan EIR analysis. Therefore, the Project's cumulative contribution to a light and glare impacts analysis now necessarily includes identification of this cumulative contribution to a significant and unavoidable cumulative impact. However, the 2035 General Plan EIR, which assumed buildout of the Campus, determined it is not feasible to mitigate light and glare impacts completely without prohibiting the use of light in new development and no other feasible mitigation measures are available. Therefore, the original alternatives analysis in the 2004 Expansion Project EIR remains adequate since a hypothetical alternative to avoid or reduce this significant cumulative impact would be infeasible.

As required by Section 15090 (a) (1)-(3) of the CEQA Guidelines, a Lead Agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.
2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

1. Changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.
2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when a Lead Agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing the reasons supporting the action. A Statement of Overriding Considerations shall be supported by substantial evidence in the Lead Agency's administrative record.



## 1.4 Project Under Review

The proposed Project would increase the size and capacity of the previously-approved 2004 Expansion Project on the existing Roseville Medical Center Campus. All of the buildings approved as part of the 2004 Expansion Project have been constructed, with the exception of: (i) a five-story, 155,000 square-foot Surgery and Intensive Care Unit Facility located along the north elevation of the existing main hospital building; (ii) a three-level, approximately 400-space parking garage located in the northeast corner of the Medical Center Campus; and (iii) a helicopter landing pad.

The proposed Project would replace the previously-approved but not constructed prior project elements with other uses that would increase the height and capacity of the project contemplated under the 2004 Expansion Project and would add a few additional elements. The proposed Project revises the 2004 Expansion Project to allow for an approximately 278,000 square foot, six-story, Inpatient Tower building on the site of the prior approved Surgery and Intensive Care Unit Facility; an expansion of the Emergency Department (which is part of the Main Hospital Building) to add 36 new treatment bays (change of use with no additional square footage); a new four-level garage with rooftop parking to accommodate approximately 800 stalls located on the site of the prior approved parking garage; relocation of the northwest corner loop road; a new main hospital entrance and drop off area; a new generator yard; and internal upgrades to the existing central utility plant. The helicopter landing pad is not proposed as part of the Project.

A detailed project description is contained in the Draft SEIR in Chapter 2, Project Description. The environmental impact analysis is included in Chapters 3 and 4 of the Draft SEIR.

## 1.5 Responses to Comments

During the public comment period, the City received two letters from public agencies—the Central Valley Regional Water Quality Control Board and the Placer County Air Pollution Control District. Responses to comments received appear in Chapter 2 of this Final SEIR. Each comment letter is numbered and presented with brackets indicating how the letter has been divided into individual comments. Each comment is given a binomial with the number of the comment letter appearing first, followed by the comment number. For example, comments in Letter 1 are numbered 1-1, 1-2, 1-3, and so on. Immediately following the letter are responses, each with binomials that correspond to the bracketed comments.

## 1.6 Mitigation Monitoring and Reporting Program

The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project includes all of the mitigation measures required of the Project as included in the Draft SEIR, including mitigation measures from the 2004 Expansion Project EIR still applicable to the proposed Project that could reduce or avoid significant environmental impacts. A copy of the MMRP is provided as a separate document to this Final SEIR.

If the City decides to approve the proposed Project, then the City Council will adopt the MMRP at the same time it adopts its CEQA Findings of Fact, as required by Section 21081.6 of the Public Resources Code.

## 1.7 Overview of the Public Participation and Review Process

The City notified all responsible and trustee agencies and all known interested groups, organizations, tribes, and individuals that the Draft SEIR was available for review. The following list of actions took place during the preparation, distribution, and review of the Draft SEIR:

- A Notice of Completion (NOC) was filed with the State Clearinghouse on February 25, 2022, along with copies of the Notice of Preparation (NOP) for the required 30-day public review period stating the City's intention to prepare a SEIR for the proposed Project. The City also posted the NOP on its website ([www.roseville.ca.us/environmentaldocuments](http://www.roseville.ca.us/environmentaldocuments)).
- A Notice of Availability (NOA) along with the required NOC and copies of the Draft SEIR were filed with the State Clearinghouse on July 22, 2022 to start the required 45-day public review period. The City mailed a legal notice to property owners within 300 ft. of the Project, posted the notice on the City's website and the Roseville Coalition of Neighborhood Associations' (RCONA) website, and sent an email with the NOA attached noticing interested groups, organizations, and individuals regarding the availability of the Draft SEIR. The City also posted the Draft SEIR on its website ([www.roseville.ca.us/environmentaldocuments](http://www.roseville.ca.us/environmentaldocuments)). The public review comment period ended on September 6, 2022.
- Copies of the Draft SEIR were available for review on the City's website (<https://www.roseville.ca.us/www.roseville.ca.us/environmentaldocuments>); and at the City of Roseville Planning Division, 311 Vernon Street, Roseville, California.

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## 2 Comments and Responses

This chapter contains the comment letters received in response to the Draft SEIR during the 45-day public review period from July 22 through September 6, 2022. The City received letters from the Central Valley Regional Water Quality Control Board and the Placer County Air Pollution Control District. No comments were received from any Tribe(s), organizations or the public. Each comment letter is numbered, each comment is bracketed, and responses are provided to each comment. To assist the reader, a brief summary of the comment has been provided; however, it is only a summary and does not repeat the comment verbatim. Please refer back to the letter for the specific comment. The responses amplify or clarify information provided in the Draft SEIR and/or refer the reader to the appropriate place in the document where the requested information can be found. No comments were received to indicate that any revisions or updates to the text of the Draft SEIR are required. However, the City of Roseville (City) staff have made minor corrections to one mitigation measure and the Project applicant has made one revision to Chapter 2, Project Description. The revised language can be found in Chapter 3, Changes to the Draft SEIR.

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## Central Valley Regional Water Quality Control Board

6 September 2022

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### COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, KAISER PERMANENTE ROSEVILLE MEDICAL CENTER INPATIENT BED TOWER PROJECT, SCH#2022020590, PLACER COUNTY

Pursuant to the State Clearinghouse's 22 July 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Kaiser Permanente Roseville Medical Center Inpatient Bed Tower Project, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

#### I. Regulatory Setting

##### Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

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MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)

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the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/](http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/)

#### **Antidegradation Considerations**

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/basin\\_plans/sacsjr\\_2018\\_05.pdf](https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf)

In part it states:

*Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*

*This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

## **II. Permitting Requirements**

#### **Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

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[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/)

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

**Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central

<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

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Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality/certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:  
[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**Dewatering Permit**

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2003/wqo/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2018-0085.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf)

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**Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf)

**NPDES Permit**

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

*Peter Minkel*

Peter Minkel  
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento

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## **Response to Letter 1**

### **Central Valley Regional Water Quality Control Board (Peter Minkel, Engineering Geologist)**

- 1-1 The comment is referencing the requirement of the Central Valley Regional Water Quality Water Board (CVRWQCB) to prepare and adopt Basin Plans for areas within the Central Valley Region. The comment does not raise any concerns regarding the adequacy of the Draft SEIR; therefore, the comment is noted and no further response is required.
- 1-2 The comment states that all discharged wastewater must comply with the Antidegradation Policy, which is a mandatory requirement in the National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements, and states the Draft SEIR should evaluate potential impacts to surface and groundwater quality.
- Potential impacts to surface and groundwater quality are addressed in the Draft SEIR in Chapter 3, “Issues Addressed in the 2004 Expansion Project EIR” starting on page 3-21. As explained on page 3-22, the 2004 Expansion Project EIR requires that all construction sites greater than an acre obtain and comply with a NPDES Permit and prepare a Stormwater Pollution Prevention Plan (SWPPP) and comply with the City’s Best Management Practices (BMPs) Guidance Manual that provides guidance on stormwater runoff control, pollution prevention and illicit discharge detection and elimination. Therefore, the Project is required to obtain a NPDES Permit and prepare a SWPPP and comply with the City’s BMPs for construction projects, as well as the City’s Stormwater Ordinance (Municipal Code Chapter 14.20) and Stormwater Management Program. Lastly, the Project would not decrease groundwater supplies or interfere substantially with groundwater recharge to impede sustainable groundwater management of the basin. As such, impacts to surface and groundwater quality were determined to remain less than significant
- 1-3 The comment provides additional information regarding Construction Stormwater General Permits when an acre or more of soil is disturbed.
- In compliance with the State’s General Storm Water Permit, the City has prepared a construction site run-off program and a post-development run off program that includes a stormwater quality maintenance program to ensure stormwater quality treatment devices, such as Low Impact Design or LID features, are properly maintained by private landowners. The Project applicant will obtain all required permits prior to grading and will comply with the requirements set forth in the Construction General Permit, including preparation of a SWPPP and compliance with the City’s construction BMPs designed to prevent pollutants from entering the watershed and the City’s storm water requirements. The comment does not raise any concerns regarding the adequacy of the Draft SEIR; therefore, the comment is noted and no further response is required.
- 1-4 The comment is referencing Phase I and II MS4 Permits and associated requirements under such permits.
- The City operates under the Phase II Small Municipal Separate Storm Sewer System (MS4) Program administered by the State Water Resources Control Board (SWRCB), which requires implementation of new development standards to protect water quality. The Project applicant is required to comply with the City’s Stormwater Ordinance and Stormwater Management Program to minimize the impacts of pollutant-generating activities. Please see Response to Comment 1-3. The comment does not raise any

concerns regarding the adequacy of the Draft SEIR; therefore, the comment is noted and no further response is required.

- 1-5 The comment is referencing the requirements under Sections 401 and 404 of the federal Clean Water Act and Waste Discharges to waters of the state, which refer to fill of wetlands, work within streams or other waters of the U.S., or fill of non-jurisdictional surface waters.

The Project site does not contain any wetlands, streams or waters of the U.S. and would not impact any of these resources. Therefore, the Project is not required to obtain or comply with these permits. The comment does not raise any concerns regarding the adequacy of the Draft SEIR; therefore, the comment is noted and no further response is required.

- 1-6 The comment is referencing the requirements of a dewatering permit that apply if a project requires removal or discharge of groundwater.

The Project would involve minimal excavation and would therefore have no effect on groundwater resources. The Project would not require a dewatering permit. The comment does not raise any concerns regarding the adequacy of the Draft SEIR; therefore, the comment is noted and no further response is required.

- 1-7 The comment is referencing the NPDES requirements for projects that require construction dewatering and other general NPDES requirements.

As explained in Response to Comment 1-2, the Project is required to obtain a NPDES Permit to ensure stormwater runoff is treated before entering any waterway, and it will comply with the requirements set forth under the permit. The comment does not raise any concerns regarding the adequacy of the Draft SEIR; therefore, the comment is noted and no further response is required.



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Erik C. White, Air Pollution Control Officer

September 6, 2022

Ms. Kinarik Shallow  
Roseville Planning Division  
311 Vernon Street  
Roseville, CA 95678

SENT VIA : [kshallow@roseville.ca.us](mailto:kshallow@roseville.ca.us)

**SUBJECT: NERSP PCL 12 – Kaiser Roseville Inpatient Bed Tower: PL#22-0038**

Ms. Shallow:

Thank you for submitting the NERSP PCL 12 – Kaiser Roseville Inpatient Bed Tower: PL#22-0038 to the Placer County Air Pollution Control District (District) for review. The District recommends consideration of the following items.

1. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permits(s) from the District. The applicant, developer, or operator of a project that includes a generator or boiler should contact the District early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a PCAPCD permit or a California Air Resources Board portable equipment registration.
2. [District Rule 228, Fugitive Dust \(PDF\)](#), establishes standards to be met by activities generating fugitive dust. When an area to be disturbed is greater than one acre, and if required by a Condition of Approval of a discretionary permit, a dust control plan must be submitted to and approved by the District. The District has developed an application for this purpose, which can be found on the District website: <https://placerair.org/FormCenter/Air-Pollution-Control-6/Dust-Control-Form-52>

2-1

2-2

Thank you for allowing the District the opportunity to review the proposed project. Please do not hesitate to contact me at 530.745.2327 or [ahobbs@placer.ca.gov](mailto:ahobbs@placer.ca.gov) if you have any questions.

Sincerely,

Ann Hobbs  
Associate Planner  
Planning & Monitoring Section

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## **Response to Letter 2**

### **Placer County Air Pollution Control District (Ann Hobbs, Associate Planner)**

- 2-1 The comment states that the Placer County Air Pollution Control District (PCAPCD) requires the Project applicant obtain a permit from the PCAPCD for any stationary sources, such as boilers or generators, as well as some construction equipment.

The Project applicant will coordinate with PCAPCD to obtain any required permits. The Project does not include any boilers or chiller units but does include a new generator yard to house two 2-megawatt emergency generators to support the Inpatient Tower building. As noted on page 4.2-31 of the Draft SEIR in Section 4.2, Air Quality, “the proposed Project would include two 2-megawatt emergency generators which would be subject to PCAPCD rules and regulations, including but not limited to Rule 501, General Permit Requirements and Rule 502, New Source Review.”

- 2-2 The comment reiterates the requirement that for projects that disturb more than an acre of land and are subject to a Condition of Approval, applicants must prepare and submit a dust control plan per District Rule 228 to the PCAPCD.

As discussed in the Draft SEIR in Section 4.2, Air Quality, mitigation measures identified in the 2004 Expansion Project EIR (i.e., Mitigation Measures 4.2-2 (a) thru (d)) would still be applicable during Project construction and operation to address the following: (i) construction emissions and dust (in compliance with Rule 228); (ii) compliance with best management practices; (iii) payment of air quality fees to offset long-term operational ozone precursor emissions; and (iv) limits on truck idling and installation of 110/280 volt power outlets at all loading docks. Compliance with Mitigation Measure 4.2-2(a) would ensure compliance with Rule 228 and other District requirements.

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## 3 Changes to the Draft SEIR

### 3.0 Introduction

This chapter presents minor corrections, additions, and revisions made to the Draft Supplemental EIR (SEIR) initiated by the Lead Agency, City of Roseville (City) and the Project applicant. New text is indicated in underline and text to be deleted is reflected by strike through, unless otherwise noted in the introduction that precedes the text change. Text changes are presented in the chapter or section and page order in which they appear in the Draft SEIR.

The changes represent minor clarifications/amplifications of the analysis contained in the Draft SEIR and do not constitute significant new information that, in accordance with CEQA Guidelines Section 15088.5, would trigger the need to recirculate portions or all of the Draft SEIR.

### 3.1 Changes to the Draft SEIR

#### Executive Summary

Mitigation Measure 4.2-2(b) on page ES-11 is revised to read:

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		<p>4.2-2(b) Contribute Air Quality Fees to offset long-term operational ozone precursor emissions.</p> <p>The landowner shall contribute <del>fifty six thousand dollars (\$56,000)</del> <u>\$48,280.79</u> per ton of NO<sub>x</sub> emissions to the <del>City</del> <u>Placer County Air Pollution Control District (PCAPCD)</u> to offset long-term operational NO<sub>x</sub> emissions (the "Air Quality Fee"). <del>The City and PCAPCD shall enter into an agreement for the collection and disbursement of the Air Quality fee for off site air quality mitigation. The Air Quality Fee is to</del> <u>shall</u> be used for projects,</p>	

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measure	Level of Significance After Mitigation
		programs and services that result in reduced emission sources that directly benefit City residents. Such projects, programs and services may include, but are not limited to, <del>replacing non-EPA-certified wood stoves,</del> transit vehicle conversions, <del>and</del> retrofitting vehicles with cleaner burning fuels, <u>and funding for public transit services, programs or operations that would support the regional transportation network and provide greater access between health care facilities in the City of Roseville and the Sacramento region.</u>	

## 2 Project Description

The third and fifth bullets under the Project's Sustainability Measures on page 2-20 have been removed.

### Sustainability Measures

The proposed Project will be designed to meet Kaiser Permanente's sustainability requirements, which include Leadership in Energy and Environmental Design (LEED) HC v4 Gold certification. Developed specifically for hospitals, this healthcare version of the LEED rating system aligns with Kaiser's sustainable design and performance goals. The proposed Project would include the following sustainability features:

- Daylight dimming of electric lighting
- Light pollution reduction, including LED lighting
- ~~Electrochromic glass at select locations to reduce heating, ventilation, and air conditioning (HVAC) energy use and improve occupant visual comfort~~
- Indoor environmental quality with an optimized HVAC system
- ~~"Solar ready" approach to easily integrate solar photovoltaics at a later date~~
- Enhanced commissioning, as well as measurement and verification of energy usage
- Alternative transportation, including preferred parking spaces for high-efficient and low-emitting vehicles, and charging stations for electric vehicles
- Preferred parking for high-occupancy vehicles (two or more people)

- Bicycle facilities including storage and changing rooms for all occupants and showers for staff
- Indoor water use reduction, including low-flow and low-flush plumbing fixtures with flush and flow rates significantly below the national standard set by the US Department of Energy's Energy Policy Act (EPACT) 1992
- Outdoor water use reduction, including high efficiency irrigation systems
- Low-emitting materials such as adhesives, sealants, paint, coatings, flooring systems, and composite wood

## 4.2 Air Quality

Mitigation measure 4.2-2(b) on page 4.2-29 is revised to read:

### 4.2-2(b) Contribute Air Quality Fees to offset long-term operational ozone precursor emissions.

The landowner shall contribute ~~fifty six thousand dollars (\$56,000)~~ \$48,27980 to the ~~City-Placer County Air Pollution Control District (PCAPCD)~~ to offset long-term operational ozone precursors emissions (the "Air Quality Fee"). ~~The City and PCAPCD shall enter into an agreement for the collection and disbursement of the Air Quality fee for off site air quality mitigation.~~ The Air Quality Fee ~~is to~~ shall be used for projects, programs and services that result in reduced emission sources that directly benefit City residents. Such projects, programs and services may include, but are not limited to, ~~replacing non EPA certified wood stoves,~~ transit vehicle conversions, ~~and retrofitting vehicles with cleaner burning fuels, and funding for public transit services, programs or operations that would support the regional transportation network and provide greater access between health care facilities in the City of Roseville and the Sacramento region.~~

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