

# Sacramento Army Depot Reuse Plan

## Final Environmental Impact Report

PREPARED BY

**City of Sacramento**



IN CONJUNCTION WITH

**EIP Associates**

September 1994

## TABLE OF CONTENTS

## TABLE OF CONTENTS

<u>Chapter</u>	<u>Page</u>
1. INTRODUCTION .....	1-1
2. PUBLIC PARTICIPATION AND REVIEW .....	2-1
3. LIST OF PERSONS COMMENTING .....	3-1
4. COMMENTS AND RESPONSES .....	4-1
5. ERRATA TO THE DRAFT EIR .....	5-1
APPENDIX .....	A-1

# 1. INTRODUCTION

## 1. INTRODUCTION

This document serves as the Response to Comments on the Sacramento Army Depot Reuse Plan Draft Environmental Impact Report (DEIR), State Clearinghouse Number 94032090. This document contains all information available in the public record to the Draft EIR as of September 23, 1994, and responds to comments in accordance with Section 15088 of the California Environmental Quality Act (CEQA) Guidelines. This document in addition to the Draft EIR comprise the Final EIR for the Sacramento Army Depot Reuse Plan.

This document contains six sections. In addition to this Introduction, these sections are Public Participation and Review, List of Persons Commenting, Comments and Responses, Errata to the Draft EIR, and an Appendix.

The Public Participation section outlines the various methods the City of Sacramento used to provide public review and solicit input on the Draft EIR. The List of Persons Commenting section identifies those agencies, groups, organizations, and individuals that submitted written comments as of August 1, 1994. The Comments and Responses section contains copies of the comment letters and responses to each comment. The Errata to the Draft EIR is provided to show corrections of errors and inconsistencies in the Draft EIR text. The Appendix provides supplemental traffic data.

It is the intent of the City of Sacramento to include this document in the official public record related to the Draft EIR. Based on the information contained in the public record decision makers will be provided with an accurate and complete record of all information related to the environmental consequences of the project.

## **2. PUBLIC PARTICIPATION AND REVIEW**

## 2. PUBLIC PARTICIPATION AND REVIEW

The City of Sacramento notified all responsible and trustee agencies and interested groups, organizations, and individuals that a Draft EIR had been completed for the proposed project. The City also used several methods to solicit input during the review period for the preparation of the Draft EIR. The following is a list of actions taken during the preparation, distribution, and review of the Draft EIR.

1. The Notice of Preparation (NOP) was filed with the State Clearinghouse on March 25, 1994. The State Clearinghouse assigned Clearinghouse Number 94032090 to the project at that time.
2. The NOP was distributed by the City of Sacramento to all responsible and trustee agencies and interested groups, organizations, and individuals. Copies of the NOP, distribution list, and comments were included in the Draft EIR Appendices.
3. A Notice of Completion (NOC) and copies of the Draft EIR were filed with the State Clearinghouse on June 17, 1994. A copy of the NOC and the State Clearinghouse distribution list is available for review and inspection at the City of Sacramento, Department of Planning and Development, Environmental Services Division, 1231 I Street, Room 300, Sacramento, California 95814.
4. An official forty-five (45) day public review period for the Draft EIR was established by the State Clearinghouse. It began on June 17, 1994, and ended on August 1, 1994.
5. A Letter of Availability was distributed to all responsible and trustee agencies and interested groups, organizations, and individuals on June 17, 1994. The Letter of Availability stated that the City of Sacramento had completed the Draft EIR and that copies were available at the City of Sacramento, Department of Planning and Development, Environmental Services Division, 1231 I Street, Room 300, Sacramento, California 95814. The Letter also indicated that the official forty-five day public review period for the Draft EIR would end on August 1, 1994.
6. The Letter of Availability was officially posted at the County Clerk's office on June 17, 1994.
7. A public notice was placed in the Sacramento Bee on June 17, 1994, which stated that the Draft EIR for the Sacramento Army Depot Reuse Plan project was available for public review and comment.

### **3. LIST OF PERSONS COMMENTING**

### 3. LIST OF PERSONS COMMENTING

Copies of all written comments received as of August 1, 1994, are contained Section 4, Comments and Responses. The following agencies, interested groups, organizations, and individuals submitted written comments on the Sacramento Army Depot Reuse Plan Draft Environmental Impact Report:

<u>AGENCY/PERSON</u>	<u>DATE OF COMMENT</u>
<b>Letter 1</b> Bob Lilly County of Sacramento Public Works Agency Water Quality Division	July 28, 1994
<b>Letter 2</b> John C. Boehm County of Sacramento Water Quality Division Senior Civil Engineer	July 30, 1994
<b>Letter 3</b> Brian A. Williams Sacramento Transportation Authority Senior Transportation Administrator	July 7, 1994
<b>Letter 4</b> William D. Hudson sacramento City Unified School District Facilities Services Division Director of Planning & Construction	July 8, 1994
<b>Letter 5</b> L. Ryan Broddrick State of California Department of Fish and Game Regional Manager	July 8, 1994
<b>Letter 6</b> Muriel Strand Sacramento Army Depot Reuse Commissioner	July 21, 1994

AGENCY/PERSON	DATE OF COMMENT
<b>Letter 7</b> Michael L. Braun Sacramento Municipal Utilities District Environmental Specialist	July 25, 1994
<b>Letter 8</b> Steven A. Herum Neumiller & Beardslee	July 27, 1994
<b>Letter 9</b> Douglas M. Fraleigh County of Sacramento Public Works Agency Administrator	August 2, 1994
<b>Letter 10</b> James Paluck County of Sacramento Water Resources Division	July 28, 1994
<b>Letter 11</b> Michael Chiriatti, Jr. Governor's Office of Planning and Research Chief, State Clearinghouse	August 1, 1994
<b>Letter 12</b> Anthony J. Palmere Sacramento Regional Transit District Planning Manager	August 1, 1994
<b>Letter 13</b> Walter Yep U.S. Army Corps of Engineers Chief, Planning Division	Undated
<b>Letter 14</b> Dea Lee Harrison, Co-trustee 1627 Berkeley Way Berkeley, CA 94703	Undated

## **4. COMMENTS AND RESPONSES**

#### 4. COMMENTS AND RESPONSES

The Sacramento Army Depot Reuse Plan Draft EIR was distributed to responsible and trustee agencies and interested groups, organizations, and individuals. The report was made available for public review and comment for a period of forty-five (45) days. The public review period for the Draft EIR established by the State Clearinghouse commenced on June 17, 1994, and expired on August 1, 1994.

Copies of all documents received as of August 1, 1994, are contained in this section. The comments have been numbered. Correspondingly numbered responses are presented for each comment which raised a significant environmental issue (CEQA Guidelines, Section 15088).

Several comments do not address the completeness or adequacy of the Draft EIR, do not raise significant environmental issues, or do not request additional information. A substantive response to such comments is not appropriate within the context of the California Environmental Quality Act (CEQA). Such comments are responded to with a "comment noted" reference. This indicates that the comment will be forwarded to all appropriate decision makers for their review and consideration.

# COUNTY OF SACRAMENTO

Letter 1

## Public Works Agency Water Quality Division Memorandum

RECEIVED

JUL 29 1994

ADMINISTRATIVE SERVICES  
PUBLIC WORKS AGENCY

July 28, 1994  
E225.000

TO: Charlie Card  
Public Infrastructure, Planning and Financing Section

FROM:  Bob Lilly  
Water Quality Division

SUBJECT: **DRAFT ENVIRONMENTAL IMPACT REPORT FOR SACRAMENTO  
ARMY DEPOT DISPOSAL AND REUSE  
(CONTROL NO. 93-0458)**

Water Quality Division Staff has reviewed the subject document on behalf of the Sacramento Regional County Sanitation District (SRCSD) and County Sanitation District No. 1 (CSD-1).

Enclosed is a letter from John Boehm of the Water Quality Division. This letter addresses the concerns of the Districts with respect to the Sacramento Army Depot Disposal and Reuse.

BL:baf

Attachment

cc: John C. Boehm

94-40

1-1

lilly/card32.mem/719

**LETTER 1 RESPONSE TO COMMENTS OF BOB LILLY, COUNTY OF SACRAMENTO PUBLIC WORKS AGENCY (Water Quality Division)**

**Response to Comment 1-1**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration during the decision-making process. The comment letter referred to in Letter 1 is addressed under Response to Comments 2-1 through 2-5.



# C O U N T Y O F S A C R A M E N T O

## WATER QUALITY DIVISION ROBERT F. SHANKS, Chief

COLLECTION SYSTEM  
ENGINEERING, MICHAEL A. MAGGI  
TREATMENT PLANT, W. H. KIDO

PUBLIC WORKS AGENCY  
DOUGLAS M. FRALEIGH, Administrator

W. H. HARADA, Director  
Public Works Administration  
F. I. HODGKINS, Director  
District Engineering  
H. D. KERTON, Director  
Solid Waste Management  
TERRY T. TICE, Director  
County Engineering

June 24, 1994  
D500.400

**Letter 2**

Caroline Quinn  
Department of Public Works  
City of Sacramento  
927 Tenth Street, Room 200  
Sacramento, CA 95814-2700

**Subject: Sacramento Army Depot Reuse-Infrastructure Report For Phased Development**

Dear Caroline:

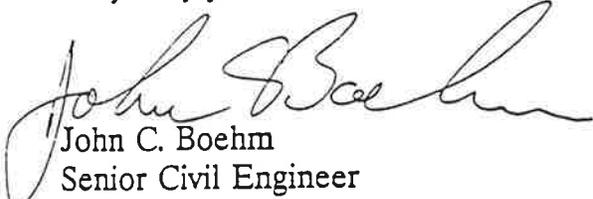
Thank you for the opportunity to review and comment on this report. The following is a list of comments pertaining to the sanitary sewer system.

1. The Sacramento Army Depot is within the boundaries of County Sanitation District No. 1(CSD-1) and the Sacramento Regional County Sanitation District (SRCSA). CSD-1 is planning on providing local sewer service on the Depot site. All future users at the Depot will be subject to CSD-1 and SRCSA Connection Fees, based on acreage and usage for trunk, interceptor and treatment capacity. There are also in-lieu sewer fees based upon the amount of frontage for the local collector laterals. 2-1
2. The sewer system at the Depot has been inspected and evaluated. The existing system is not considered "inadequate." It has been determined that only minor portions of the existing system need repair. Based on this information, we plan to utilize the existing system wherever possible. A preliminary analysis has indicated that approximately \$250,000 of rehabilitation work is needed. 2-2
3. The District does not have an opinion on single verses multi phase development. CSD-1 is planning on upgrading the existing system as the need arises. This work will be financed through the normal funding process used by CSD-1. This is accomplished by the payment of Connection Fees at the time that individual parcels connect to the sewer system. We do not anticipate that it will be necessary to participate in an assessment district to accomplish the work. 2-3

4. The "Infrastructure Report" indicates a pump station along the west side of the Depot. The District does not plan on constructing such a facility. 2-4
  
5. There are limited sewer facilities for the southern half of the Depot. The District is planning on serving this area from facilities near the southeast corner of the Depot. Currently, the Department of Corrections is planning a large prison facility on Parcel 8. This construction should make sewer available to parcels 5, 6, 7, 8, and 9. 2-5

If you have any questions, please do not hesitate to contact me at 855-8253.

Very truly yours,

  
John C. Boehm  
Senior Civil Engineer

JCB/RSF:baf

cc: Michael A. Maggi  
Donald G. Glum

**LETTER 2 RESPONSE TO COMMENTS OF JOHN C. BOEHM, COUNTY OF SACRAMENTO (Water Quality Division)**

**Response to Comment 2-1**

The comment is noted and will be forwarded to the Sacramento City Council for consideration in the decision-making process.

**Response to Comment 2-2**

The comment is noted and will be forwarded to the Sacramento City Council for consideration in the decision-making process. The DEIR is hereby amended to reflect the information contained in the above comment. The text in the third sentence from the bottom of the third paragraph on page 6.6-13 of the DEIR is amended to read as follows:

~~Additionally, the on-site sewage collection system will need to be upgraded, is~~  
~~adequate to handle flow generated by the proposed project. However, minor~~  
~~portions of the system will need to be repaired and the system would need to be~~  
extended to serve the southerly portion of the site.

**Response to Comment 2-3**

The comment is noted and will be forwarded to the Sacramento City Council for consideration in the decision-making process.

**Response to Comment 2-4**

The comment is noted and will be forwarded to the Sacramento City Council for consideration in the decision-making process. The information in the Infrastructure Report was relied on in preparing the public services section of the DEIR. However, comments on issues related to funding for the various features and improvements in the Infrastructure Report are not addressed in the DEIR because funding issues are not considered to result in physical environmental effects.

**Response to Comment 2-5**

The comment is noted and will be forwarded to the Sacramento City Council for consideration in the decision-making process. The prison project is in the early stages of planning and is not considered as a component of the proposed Sacramento Army Depot Reuse Plan. Infrastructure requirements for specific future projects on the Army Depot are not included in the environmental review process for the proposed project. Any future development on the proposed project site must be consistent with the planned uses and will be analyzed for environmental effects on a project-by-project basis.



July 7, 1994

CITY OF SACRAMENTO  
PLANNING DIVISION

JUL 11 1994

RECEIVED

Mark Kraft  
City of Sacramento - Planning Division  
1231 I Street, Room 300  
Sacramento, CA 95814

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SACRAMENTO  
ARMY DEPOT REUSE PLAN (M94-020)**

Dear Mr. Kraft,

The Sacramento Transportation Authority (STA) is the congestion management agency (CMA) for Sacramento County. As such it prepares a biennial congestion management program (CMP), and monitors roadway and transit levels of service, per adopted CMP standards, on the CMP transportation network.

Staff has reviewed the transportation impact section of the subject document, and determined that anticipated traffic impacts are consistent with the CMP level of service (LOS) standard for Power Inn Road. Power Inn Road appears to be the only CMP roadway which will be measurably effected by the proposed project.

Some important information required by the CMP, however, should be amended to the traffic analysis:

- A discussion or analysis of the consistency between the underlying modeling assumptions in the subject traffic analysis with those of the County-wide CMP model should be presented.
- A discussion or analysis of the consistency between the assumed land use patterns and transportation networks in the subject traffic analysis with those assumed in the County-wide CMP model should be presented.

3-1

Thank you for providing the STA with the opportunity to comment on the subject document. If you have questions regarding these comments or on any CMP-related matter, please call me at 323-0895.

Sincerely,

A handwritten signature in cursive script that reads "Brian A. Williams".

Brian A. Williams  
Senior Transportation Administrator

**LETTER 3 RESPONSE TO COMMENTS OF BRIAN A. WILLIAMS, SACRAMENTO  
TRANSPORTATION AUTHORITY**

**Response to Comment 3-1**

The DEIR traffic analysis used the SACMET model, which has been approved by the Sacramento Transportation Authority for cumulative analysis in this area. In preparing the analysis, the consultant modified the model's land use data base in the Traffic Analysis Zone (TAZ) containing the Army Depot, in order to account for the proposed land use plan and its associated trip generation and access characteristics.

# Sacramento City Unified School District

## Facilities Services Division

425 First Avenue • Sacramento, California • 95818-2032  
FAX Number: (916) 264-4014



July 8, 1994

**Ray Rodriguez**  
*Administrator*  
Facilities Services  
Division  
(916) 264-4091

**Colin Croas**  
*Director*  
Industrial Hygiene  
Branch  
(916) 264-4533

**William D. Hudson**  
*District Architect*  
Director  
Planning and  
Construction Branch  
(916) 264-4080

**Richard Niday**  
*Director*  
Maintenance and  
Operations Branch  
(916) 264-4075

Mark Kraft  
City of Sacramento Planning Division  
1231 I Street, Room 300  
Sacramento, CA 95814

**RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SACRAMENTO  
ARMY DEPOT REUSE PLAN (M94-020)**

Dear Mark:

Thank you for sending this District a copy of the Draft Environmental Impact Report for the Sacramento Army Depot Reuse Plan.

We have reviewed the draft EIR and have discovered that it completely fails to address potential impacts of the project upon public education. There is no information in the draft EIR as to direct or indirect growth inducing impacts on school facilities in our District.

4-1

Please consider this letter as a request that the potential impacts of this project on school facilities be addressed in the final EIR. We would be happy to work with you to determine such impacts as the EIR is being finalized.

4-2

Sincerely,

William D. Hudson  
Director of Planning & Construction

WDH/bma

cc: Ray Rodriguez

a:bill.wpm

**LETTER 4 RESPONSE TO COMMENTS OF WILLIAM D. HUDSON, SACRAMENTO CITY UNIFIED SCHOOL DISTRICT (FACILITIES SERVICES DIVISION)**

**Response to Comment 4-1**

Impacts to schools are typically based upon the number of new dwelling units to be constructed with the approval of a proposed project. The proposed Army Depot Reuse Plan includes a General Plan Amendment to redesignate the project site with 83 acres of parks and parks and open space, 79 acres of public/quasi-public, and 323 acres of industrial development. Because residential uses are not proposed, direct impacts to schools and public education are not anticipated to occur. However, it is acknowledged that any construction of new non-residential floor area on the project site will be required to pay to the Sacramento City Unified School District the standard school impact fee of 27¢ per square foot.

Chapter 7 of the Sacramento Army Depot Reuse Plan Draft EIR states that the proposed project will not be growth inducing. In addition, if the buildout of the proposed plan were to result in increased pressure to develop new residential areas in the region, then these new residential developments would be considered for direct effects on schools in the environmental documentation prepared for the residential project. Also, new residential projects in the region would be required to pay the residential school impact fee to offset the impact to the school district.

**Response to Comment 4-2**

Please see Response to Comment 4-1.

## DEPARTMENT OF FISH AND GAME

REGION 2

NIMBUS ROAD, SUITE-A  
CHO CORDOVA, CA 95670

(916) 355-7020



July 8, 1994

Mr. Mark Kraft  
 City of Sacramento  
 1231 I Street, Room 200  
 Sacramento, California 95814

Dear Mr. Kraft:

The Department of Fish and Game (DFG) has reviewed the draft Environmental Impact Report (EIR) for the Sacramento Army Depot Reuse Plan (SCH# 94032090). The project comprises approximately 485 acres in Sacramento County. The project proposes a general plan amendment for the reuse of the Army Depot, allowing the development of a commercial, industrial, and residential complex. Significant resources identified as occurring at the project site are nesting and foraging habitat for a California Species of Special Concern, the burrowing owl (Speotyto cunicularia), foraging habitat for the State-listed as Threatened Swainson's hawk (Buteo swainsoni), wetland habitat, and the Federal candidate species California linderiella (Linderiella occidentalis). The EIR states that cumulative impacts to wetlands and burrowing owls will remain significant and unavoidable after implementation of feasible mitigation alternatives.

The DFG is providing these comments as a Trustee Agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California (California Environmental Quality Act (CEQA) Guidelines Section 15385 et seq.). The DFG has the following concerns regarding the EIR's adequacy in evaluating impacts to fish and wildlife resources from project implementation:

1. The EIR states that wetland impacts will be mitigated during the Army Corps of Engineers Section 404 of the Clean Water Act and the DFG Streambed Alteration Agreement processes. Three problems are created by this proposed mitigation:
  - a. not all wetland habitat will be mitigated during the above permitting processes, resulting in a net loss of wetland habitat;
  - b. the EIR attempts to defer mitigation to a process which has not been certified as a CEQA equivalent process by the Secretary of Resources; and

5-1

c. habitat protection is assumed beyond that provided by Fish and Game Code Section 1600 et seq.

5-1 Cont.

2. The EIR should be revised to provide mitigation so that no net loss of wetland habitat value and acreage occurs. Additionally, buffers necessary for the protection of wetland resources are described in the DFG Wetlands Resources Policy as being "defined by the requirements of the species most sensitive to disturbance" (Fish and Game Code Addendum, p. 576). The EIR (p. 6.5-19) should be revised to eliminate the fifty-foot statement and provide buffers for those species affected by impacts to areas adjacent to the wetland resource.

5-2

3. The EIR correctly identifies variables contributing to the thriving population of burrowing owls at the Depot site, including relative seclusion, predator control and available foraging habitat. Impacts to burrowing owls are then identified as significant and unavoidable. This will result as activity and development increase over time. Not only will burrowing owl habitat be degraded and eliminated, the birds may chose to abandon the area once activity levels reach unacceptable levels.

5-3

The lead agency is reminded that the DFG's goal for those animals identified as species of special concern is to provide an environment which will prevent the species from becoming threatened or endangered. Given the precipitous decline of burrowing owls in recent years it is prudent to provide mitigation for the cumulative impacts to burrowing owls at this location.

Mitigation may occur at an off-site location, so that passive relocation of the birds may occur as the site becomes more developed. There are no estimates of the acreage of burrowing owl habitat proposed for development at the site. Mitigation should be provided which includes the proposed on-site habitat preservation area (64 acres) as well an mitigation at an off-site location so that no net loss of burrowing owl foraging and nesting habitat occurs. The DFG should be contacted at the earliest possible convenience for developing criteria for the burrowing owl management plan for this site.

5-4

5-5

4. The applicant should be advised that work within the 100-year flood plain, consisting of but not limited to diversion or obstruction of the natural flow or changes in the channel, bed, or bank of any river, stream, or lake, will

5-6

Mr. Mark Kraft  
July 8, 1994  
Page Three

require notification to the DFG as required by Fish and Game Code Section 1600 et seq. The notification (with fee), and subsequent agreement, must be completed prior to initiating any such work. Notification to the DFG should be made after the project is approved by the lead agency. The agreement process should not be used in lieu of specific mitigation measures to be included as conditions of project approval by the lead agency.

5-6  
Cont.

In order to comply with Public Resources Code Section 21081.6, a detailed monitoring program must be developed for all mitigation conditions. The monitoring program should include the following:

1. Specific criteria to measure the effectiveness of mitigation.
2. Annual monitoring for a minimum of five years. Annual written reports submitted to the lead agency and the DFG.
3. Annual monitoring reports, each of which include corrective recommendations that shall be implemented in order to ensure that mitigation efforts are successful.

5-7

Pursuant to Public Resources Code Sections 21092 and 21092.2, the DFG requests written notification of proposed actions and pending decisions regarding this project. Written notification should be sent to this office.

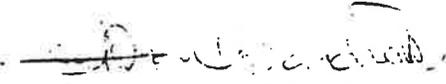
5-8

This project will have an impact to fish and/or wildlife habitat. Assessment of fees under Public Resources Code Section 21089 and as defined by Fish and Game Code Section 711.4 is necessary. Fees are payable by the project applicant upon filing of the Notice of Determination by the lead agency.

5-9

If we can be of further assistance, please contact Ms. Terry Roscoe, Wildlife Biologist, or Mr. David Zezulak, Acting Environmental Services Supervisor, telephone (916) 355-7030.

Sincerely,

  
L. Ryan Broddrick  
Regional Manager

cc: See Attached

Mr. Mrak Kraft

8, 1994

Page Four

c: Ms. Terry Roscoe  
Rancho Cordova, California

Mr. Dave Zezulak  
Rancho Cordova, California

## LETTER 5 RESPONSE TO COMMENTS OF L. RYAN BRODDRICK, CALIFORNIA DEPARTMENT OF FISH AND GAME

### Response to Comment 5-1

This document has been prepared in compliance with the California Environmental Quality Act (CEQA) to identify the significant environmental impacts of the proposed project and to identify measures to reduce these impacts. The proposed project is the approval of the reuse plan to enable transfer of the majority of the current Sacramento Army Depot site from federal to private ownership and to facilitate industrial redevelopment. This EIR is intended to provide environmental information at the earliest stage in the project that will be considered in the preparation of industrial redevelopment. This intent is support by the CEQA Guidelines Section 15004(b), which states:

Choosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process to enable environmental considerations to influence a project program and design and yet late enough to provide meaningful information for environmental assessment.

The City of Sacramento will use the information in this EIR during review of the subsequent redevelopment projects. However, given that no specific projects have been proposed, it cannot be determined that total avoidance of impacts to wetlands is possible. Because total avoidance may not be possible, the proposed project is considered to have the potential to impact wetlands. Once specific redevelopment projects are proposed and projects are planned to a level in which the exact placement of facilities and uses have been identified and the exact number of acres of wetlands that will be impacted by the project can be determined, specific mitigation measures will be identified to the satisfaction of the U.S. Army Corps of Engineers and the California Department of Fish and Game to comply with the no-net-loss policy. Until this process occurs, the impact is determined to remain significant and unavoidable.

### Response to Comment 5-2

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. The fifty-foot buffer was defined based on the requirements of the species most sensitive to disturbance to areas adjacent to wetland resources. In this case the species being protected is fairy shrimp (*Branchinecta lynchi*).

Please see Response to Comment 5-1.

### Response to Comment 5-3

The project site is located within an area surrounded by industrial development and land uses. Due to the industrial development of surrounding lands adjacent off-site mitigation is infeasible.

Passive relocation may not work because the industrial lands do not provide suitable habitat for the birds to move onto.

#### **Response to Comment 5-4**

Burrowing owl habitat includes land designated as annual grasslands. There are 147 acres of annual grasslands on the project site. The proposed project designates approximately 83 acres of the site as Open Space, of which approximately 64 acres has been identified as habitat preservation. This area contains the majority of the known and presumed nests on the project site. The City of Sacramento will use the information in this EIR during review of the subsequent redevelopment projects. However, given that no specific projects have been proposed, it can not be determined how many acres of habitat would be lost. Once specific redevelopment projects are proposed and projects are planned to a level in which the exact placement of facilities and uses have been identified and the exact number of acres of burrowing owl habitat that will be impacted by the project can be determined and appropriate specific mitigation measures identified.

The Habitat Preservation Area designated in the proposed Sacramento Army Depot Reuse Plan is intended to avoid decline of burrowing owls and their habitat on the project site. To ensure that a viable population survives 60 percent of the known and presumed burrows are preserved due to their location within the open space designation. The burrows located outside the open space designation are proximate to the open space boundary allowing the birds to passively relocate and colonize the currently unused habitat within the open space designation.

#### **Response to Comment 5-5**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. The City of Sacramento will contact Fish and Game to develop policy language to be included in the Sacramento Army Depot Reuse Plan for the preservation of the burrowing owl habitat. The policy language that may be identified in the plan may include the prohibition of mowing and landscaping activities in the Habitat Preservation Area, prohibition of the use of chemicals in the Habitat Preservation Area, and markers or fencing identifying the area as a Habitat Preservation Area.

#### **Response to Comment 5-6**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. The City of Sacramento will comply with Fish and Game Code Section 1600 et seq. The agreement process is not being used in lieu of specific mitigation measures to be included as conditions of project approval by the lead agency.

#### **Response to Comment 5-7**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. The City of Sacramento will comply with Public

Resources Code Section 21081.6 and will prepare a mitigation monitoring plan prior to project approval.

**Response to Comment 5-8**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. The City of Sacramento will comply with Public Resources Code Sections 21092 and 21092.2 and send written notification of the pending decisions regarding the proposed project to the Department of Fish and Game.

**Response to Comment 5-9**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. The City of Sacramento will comply with Public Resources Code Section 21089 and Fish and Game Code Section 711.4 and will pay to California Department of Fish and Game the appropriate fees upon the filing of the Notice of Determination for the project.

July 21, 1994

TO: City of Sacramento  
c/o Mark Kraft, Project Coordinator  
Dept. of Planning & Development  
1231 I Street, #200  
Sacramento CA 95814

FROM: Muriel Strand  
Sacramento Army Depot Reuse Commissioner

RE: Comments on Sacramento Army Depot Reuse Plan Draft EIR

General Comments on Economic Development & Environmental Mitigation

The Commission's primary goal in the Plan process was to support and promote economic development on this site. Adequate transportation is of course essential to this goal. However, we need to remember that economics is about providing ourselves with adequate food, shelter and clothing, not in rushing about all over the landscape in order to do so.

6-1

The conventional definition of "adequate transportation" on which this Plan is based must be reconsidered on a more fundamental level than it has been for the current version of the Plan. Older cities with roadway designs which are based on criteria now deemed inadequate nevertheless manage to maintain adequate economic activity. Such fundamental review should include items like Dept. of Public Works (DPW) basic design criteria quantities; for example, peak commute trips per employee, commercial vehicle trips per square foot of warehouse, ADT/lane, etc. need to be reexamined. Similarly, Transit District operations should be budgeted from the General Fund as DPW operations are currently. The need for this kind of review is not limited to this Plan.

6-2

Sacramento is now in an era where air quality improvement is also essential to this goal, given the requirements of the 1990 Federal Clean Air Act Amendments with respect to air pollution emissions reductions and conformity of transportation plans. Since the clear majority of Sacramento's air quality problems are due to motor vehicle emissions, it is inappropriate to simply continue to use the conventional traffic planning methods which have created much of the current problem. Building more and more roads is no longer the transportation answer, and is beginning to choke rather than nurture economic development.

6-3

While it is very difficult to start building a different transportation system with one particular project, in the middle of a system designed by the old rules, there is unfortunately nowhere else to begin. The only thing more difficult than changing now is changing later. New industrial projects are now required to offset new air emissions by reductions elsewhere; since the largest source of such reductions is motor vehicles, it seems foolish to automatically plan more roadway construction for more vehicles. At the same time, the problem of figuring out the new design conventions that we need is a daunting prospect.

6-4

Fortunately, there is an effective mechanism available which I highly recommend - market-based incentives (MBI) such as parking pricing, gasoline user fees, etc. By raising the costs of driving in a gradual, precisely targeted manner, jurisdictions can affect the choices of millions of drivers without implementing the sort of unwieldy bureaucracy which would otherwise be required. With MBI, people will direct their ingenuity to maximizing effective transportation and minimizing expenditure. With transportation control measures such as trip reduction ordinances and HOV lanes, people will direct

6-5

their ingenuity to maximizing change for others and minimizing change for themselves. Both approaches will cost money; MBIs however can transfer money from drivers to constructive change rather than from taxpayers and businesses to bureaucrats. In view of the imminent restructuring of the Sacramento Metropolitan Air Quality Management District Board to include city council members, I believe city government needs to become informed and proactive on these issues.

6-5  
Cont

MBI represents an available and effective mitigation for the significant and unavoidable increase in ozone precursors and PM10 which this DEIR predicts.

6-6

With respect to Biological Resources, the DEIR concludes that the Plan would entail a significant and unavoidable loss of wildlife habitat and wetlands. This indicates that the conventions for design of our buildings and cities require the same sort of fundamental review as do our roadway design conventions. We need to evolve so as to live peaceably with our neighbors, rather than obliterating them. Refraining from covering the landscape with asphalt will go a long way toward this goal.

6-7

### 6.2 Transportation & Circulation

Mitigation for traffic generated by the proposed Plan includes fair share contributions from project proponents for street improvements. Transit operating and capital expenses should have priority over roadway expansion for receiving such contributions, and allocation of such contributions should be based on a cost benefit analysis.

6-8

Buildout of Alternative B which would roughly double present employment would more than double transit needs, given the conformity constraints on vehicle activity associated with the site which limit this activity to recent levels.

6-9

Cumulative transit needs should be defined and mitigation specified consistent with the comments above.

6-10

On page 6.2-1, reference is made to estimates of recent onsite traffic levels. Such information should be included, since traffic associated with the proposed plan would be based on a similar number of employees. The offsite traffic analysis which begins on page 6.2-11 should be extended to include onsite traffic, and both analyses should be stated in terms of ADT/lane, peak-hour-trips/lane, and lane-mile/employee, as well as being compared to central city ADT/lane and peak-trips/lane traffic flows. Average vehicle ridership of 1.2 (p. 6.2-14) should be verified rather than assumed. Mitigation in the event of failing to achieve the assumed 35% trip reduction should be specified. Traffic circles should be investigated as an alternative to construction of right and left hand turn lanes.

6-11

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6-15

The estimated growth rates of human and vehicle population, vehicle trips and miles traveled which were used to analyze cumulative traffic conditions should be explicitly stated, and their source identified. Does the SACMET model include transit and bicycles? Can this model respond to the feedback effects of increasing congestion? The answers to these questions are essential to evaluating the results of the model. Cumulative traffic conditions in 2010 should be described in terms of ADT/lane.

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6-19

### 6.3 Air Quality

Vehicle activity (trips and miles traveled) associated with the site should be specified, and future mitigation should be increased to the extent necessary to limit activity to these levels. Conformity constraints on commuter trips

6-20

apparently exist; the relevance of such constraints on commercial vehicle activity should be investigated.

6-20  
Con

It would seem more desirable to have smaller (shorter time interval) transit headways rather than greater (longer time interval). Bicycle lockers and racks should be located near building entrances, within view of windows. Racks should be suitable for kryptonite locks, and should be protected from weather and theft.

6-21

It is incorrect to state that mitigation measures for cumulative ozone and particulate matter are not available. As noted above, measures such as parking and emissions fees, and other robust market-based incentives which have been shown to be effective in reducing vehicle activity, can be implemented by local jurisdictions.

6-22

EMFAC7F emissions factors should be used for all on-road motor vehicle emissions estimates.

6-23

#### 6.4 Hydrology & Water Quality

Mitigation for drainage facility capacity impact should take into account the likelihood of increased flows due to decreased infiltration capacity upstream. Possible mitigation facilities should also include restoration of Morrison Creek in a feasible location and minimization of onsite roadway.

6-24

#### 6.5 Biological Resources

There appears to be an inconsistency between the impact of alternative B on Swainson's hawk foraging habitat in sections 6.5-2 and 6.5-6.

6-25

#### 6.6 Public Services

Mitigation for the impact of the proposed Plan on the water supply and wastewater conveyance systems should include water conservation in design and use of onsite construction, as well as prohibition of lawns, and other xeriscaping measures. Since solid waste generation may be found significant in the future, site and building design should be amenable to precycling and recycling.

6-26

Mitigation for the single-user design of existing electrical, natural gas and telecommunications facilities could also include a mutually agreeable administrative and operating arrangement among project proponents. This could be more cost-effective than the mitigation suggested in the DEIR.

6-27

## **LETTER 6 RESPONSE TO COMMENTS OF MURIEL STRAND, SACRAMENTO ARMY DEPOT REUSE COMMISSIONER**

### **Response to Comment 6-1**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process.

### **Response to Comment 6-2**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. Although the need for a re-examination of the definition of "adequate transportation", and the basic assumptions underlying transportation design criteria, as well as funding structure for transit district operations are all legitimate concerns, this comment does not deal directly with the adequacy of this Environmental Impact Report.

### **Response to Comment 6-3**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. The Sacramento Army Depot Reuse Commission was created by the City Council to produce a reuse plan which results in would increase economic and employment opportunities consistent with land-use zoning for interim and long term use. The Commission held 21 consecutive monthly public meetings to produce such a plan. While many alternative methods for dealing with land use, open space, and transportation issues were considered during this period, it was the prevailing sentiment of the Commission that a more conventional style of industrial development was the preferred course of action for the plan to pursue, in order to insure that the site will be competitive in attracting developers and expediting redevelopment. The plan was constructed under this assumption, and was adopted by the Commission. The Environmental Impact Report analyzed this preferred plan. Although the concerns addressed in this comment are legitimate, they do not deal directly with the adequacy of this Environmental Impact Report.

### **Response to Comment 6-4**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. Please see response to Comment B-3.

### **Response to Comment 6-5**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. This comment specifies several promising solutions to regional transportation problems. However, implementation of these measures would require not only city-wide but region-wide consensus and cooperation. Therefore, it is beyond the scope of the project analyzed in this Environmental Impact Report to implement these measures. As such the comment does not deal directly with the adequacy of this Environmental Impact Report.

**Response to Comment 6-6**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. Please see Response to Comment B-5.

**Response to Comment 6-7**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. Please see response to Comment B-1.

**Response to Comment 6-8**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process.

**Response to Comment 6-9**

This comment is consistent with the DEIR, which notes that this alternative would result in demand for transit services which is roughly double that of the preferred alternative.

**Response to Comment 6-10**

Regional Transit has reviewed the Re-Use plan and has suggested modifications to transit routes which will link the Power Inn Road area, including the Army Depot site, with Light Rail stations. Additional long term analysis of area and community-wide transit needs is most efficiently addressed outside of this EIR by Regional Transit.

**Response to Comment 6-11**

Traffic count information was collected at entrances to the Army Depot in January 1993 as part of this study. This information is summarized in the attached excerpt from the DEIR Traffic Study. At that time, observed site traffic totaled about 12,500 daily vehicle trips.

**Response to Comment 6-12**

The DEIR traffic analysis makes use of operating Level of Service to quantify and describe current traffic conditions and project impacts. Both intersection and roadway segment Levels of Service were investigated. This approach is consistent with other City of Sacramento EIR's and typical engineering practice. The identification of roadway segment Levels of Service make use of roadway capacities and LOS thresholds which have been derived from accepted flow rates (i.e., vehicles per hour per lane).

The DEIR traffic study identified daily traffic volumes on the internal roadway system. Traffic volumes in the range of 5,000 to 10,000 ADT were forecast. As these volumes fall well within the LOS "C" threshold for the proposed four lane roads (i.e., up to 24,000 ADT), no additional technical analysis of internal roadways was required.

Comparison of traffic flow characteristics in the area of the Sacramento Army Depot with those associated with the Central City is not meaningful, as very different street systems are involved. The Central City system is composed of major one way streets on a-grid system with significant numbers of pedestrians. In the area of the Army Depot, however, the circulation system features major arterial streets with two way flow and signalized intersections with good spacing.

#### **Response to Comment 6-13**

The vehicle occupancy rate is discussed on page 939 of Trip Generation, 5th Edition, Institute of Transportation Engineers and has been validated by City staff in the Transportation Division report "Occupancy Study - Central City", which suggested similar but slightly higher rates (1.21) in 1994.

#### **Response to Comment 6-14**

Major project occupants will have to conform to the City's existing Transportation Management Plan (TMP) ordinance. The ordinance establishes a goal of 35% non-single auto commute share, as well as annual monitoring of automobile occupancy at participating businesses. If the 35% goal is not achieved, additional TMP measures are required to be implemented. As each business will establish its own TMP, it is not appropriate to designate specific TMP measures at this time.

#### **Response to Comment 6-15**

Traffic Circles (Roundabouts) are an alternative method of assigning intersection right of way, which may be used in lieu of traffic signals or stop signs. They have not been employed in the Sacramento area in significant numbers, and have not been incorporated into the proposed project plan.

#### **Response to Comment 6-16**

Future cumulative traffic forecasts were developed using the SACMET traffic model. This model is maintained by SACOG and incorporates future land use assumptions developed by that agency in cooperation with Sacramento City and County.

#### **Response to Comment 6-17**

The SACMET model accounts for modal choice to alternative modes, including transit and bicycles.

#### **Response to Comment 6-18**

The SACMET Model's assignment process accounts for the effects of increasing traffic volume and associated increases in travel time. Through an iterative process, the model reviews travel times on alternative travel paths in order to assign traffic to "least time" paths and avoid congestion.

### **Response to Comment 6-19**

Please see response to comment 6-6 above.

### **Response to Comment 6-20**

The number of daily and peak hour trips generated by the project are described in the DEIR. An employee limit has already been incorporated into the project to limit potential Air Quality impacts, although no provisions have been included for future traffic monitoring. The City's TMP ordinance required annual monitoring to address vehicular occupancy, but does not account for site trip generation. The City's ordinance does not currently address commercial vehicle activity.

### **Response to Comment 6-21**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. While shorter time intervals between transit headways may be more desirable for transit riders, changes in transit service are not within the scope of the Sacramento Army Depot Reuse Plan EIR and not within the jurisdiction of the City of Sacramento. In addition, there is no evidence that shorter intervals for transit services in the Army Depot area would provide any benefit to regional air quality. Similarly, specific requirements for bicycle lockers and racks may be more convenient for employees on the project site, but any air quality benefits of these requirements can not be quantified into reductions in air pollutant emissions.

### **Response to Comment 6-22**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. See response to Comment B-5.

### **Response to Comment 6-23**

The CALINE4 computer model was used to estimate carbon monoxide concentrations at several roadway intersections in the project area. As an input into this model, the EMFAC7F emission factors were used for all on-road vehicle emission estimates. Similarly, ozone and particulate matter emissions were estimated using the URBEMIS3 computer model. However, this model uses the EMFAC7D emission factors as a default and has not been updated to include the newer EMFAC7F emission factors.

### **Response to Comment 6-24**

On pages 6.4-20 through 6.4-22 of the Sacramento Army Depot Reuse Plan Draft EIR, Impact and Mitigation Measure 6.2-3 address the cumulative impacts to the drainage facility capacity. The impact discussion states the following:

Development of the proposed project, in conjunction with the urban development in the Morrison Creek watershed, would increase the amount of impervious surface, increasing the rate and amount of surface water runoff entering the existing drainage system. Increased surface water runoff could exceed existing drainage system capacity and contribute to localized flooding.

The mitigation measures presented for this impact identify potential improvements to Morrison Creek. The mitigation measures presented in the Sacramento Army Depot Reuse Plan EIR are restated below:

- (a) *The City of Sacramento shall continue to coordinate with the United States Army Corps of Engineers and the County of Sacramento to assess the level of flood protection provided by the Morrison Creek Flood Control System.*
- (b) *The City of Sacramento shall participate in the development of alternatives to increase the capacity of the Morrison Creek Flood Control System to accommodate existing flows, and flows which would result from future development. These alternatives may include, but are not limited to, the following:*
  - (i) *raising levees,*
  - (ii) *channel widening,*
  - (iii) *floodwalls; and*
  - (iv) *detention basins.*
- (c) *Since it is highly unlikely that 100-year level of protection will be attained on Morrison Creek prior to Depot redevelopment, mitigation for increased peak flow rate and volume is required. The detailed drainage study as required in project specific mitigation (6.2-2) shall identify the stormwater management facilities to regulate rate and volume of runoff released to Morrison Creek.*

#### **Response to Comment 6-25**

Under Impact 6.5-6, the discussion for Alternative B incorrectly referred to Swainson's hawk foraging habitat. Page 6.5-24 is amended to read as follows:

- AB The proposed project in conjunction with cumulative development will potentially result in the loss of ~~Swainson's hawk foraging~~ wildlife habitat. This is considered a **significant impact**.

#### **Response to Comment 6-26**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. The prohibition of lawns and other xeriscaping measures was not included in the plan developed and approved by the Reuse Commission, and as such, the comment does not deal directly with the adequacy of this Environmental Impact Report. The suggestion that these measures be included in the Plan will be expressed to the City Council when the Reuse Plan is presented for their approval.

**Response to Comment 6-27**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process. Mandating cooperative administrative and operating arrangements for individual utilities users through the EIR process, could result in a negative effect on the marketability of the site, and therefore run counter to the mission of the Reuse Commission and the Reuse Plan (See response to Comment B-1). Although such cooperative agreements may indeed prove economically feasible and attractive, these decisions are best left to the Plan implementation process, and to the discretion of future land owners.



SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211  
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

July 25, 1994

ENV94-344

Mark Kraft, Project Manager  
City of Sacramento, Planning and Development  
Planning Division  
1231 I Street, Room 200  
Sacramento, CA 95814

CITY OF SACRAMENTO  
PLANNING DIVISION

JUL 29 1994

Comments on Draft EIR for Sacramento Army Depot

RECEIVED

Dear Mr. Kraft,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to review and comment on the Draft EIR for the Sacramento Army Depot. The Draft EIR appears to have encompassed all of the comments that SMUD made to the NOP for this project. At this time SMUD has no further comments.

7-1

The SMUD contact for information on electrical facilities in this area continues to be Bruce DeSelle at (916) 732-5736. If you have any questions regarding this letter, please contact me at (916) 732-6863.

Sincerely,

*Michael L. Braun*  
**Michael L. Braun**  
Environmental Specialist

File 421.16  
SAC.ARMY DEPOT REUSE.DEIR

cc: B. DeSelle MS 57  
K. Shorey MS 30  
P. Frost MS 30

**LETTER 7 RESPONSE TO COMMENTS OF MICHAEL L. BRAUN, SACRAMENTO  
MUNICIPAL UTILITIES DISTRICT**

**Response to Comment 7-1**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process.

## NEUMILLER &amp; BEARDSLEE

A PROFESSIONAL CORPORATION • ATTORNEYS &amp; COUNSELORS

ESTABLISHED 1903

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July 27, 1994

Via Federal Express

Mark Kraft  
City of Sacramento  
Planning Division  
1231 "I" Street, Room 300  
Sacramento, California 95814

Re: Draft Environmental Impact Report For Sacramento  
Army Depot Refuse Plan (M94-020)

Dear Mr. Kraft:

This letter is written on behalf of the trustees of the Van der Boom Family Trust. The Family Trust owns real property that is adjacent to Sacramento Army Depot which is the subject of the Draft Environmental Impact Report.

On behalf of the Trust, we submit the following comments concerning the Draft Environmental Impact Report prepared by EIP.

1. At page 6.7-31, Impacts and Mitigation Measures Section 6.7-1 and Section 2.43, Section 6.7-1, we disagree that construction should occur while "potential exists that unidentified sites of contamination are still present on the site." It is wrong to allow construction activities to occur before the contamination sites are identified and depicted so that proper remediation can occur. Thus, mitigation measure 6.7-1 Construction Activities, Contamination Soil (project specific) (a) and (b) are misguided. Mitigation measure (a) provides that construction activity will stop and sampling shall be conducted if contamination is suspected. Since the EIR concedes that unidentified sites exist, the commencement of construction before completing the necessary studies violates a basic principal of the California Environmental Quality Act that study occur before physical changes to the environment. CEQA Guideline Section 15004(b)(1) provides, "with public projects, at the earliest feasible time, project sponsors shall incorporate environmental

8-1

considerations into project conceptualization, design, and planning. CEQA compliance should be completed prior to acquisition of a site for a public project." Note that shall is a mandatory element which all public agencies are required to follow. CEQA Guideline Section 15005(a). Deferring studies until after construction has begun violates CEQA. Judicial intolerance of deferring studies until after an irrevocable decision has been made to proceed with the project is clearly expressed in Sundstrom vs. County of Mendocino (1988) 202 Cal.App.3d 296. In Sundstrom environmental mitigation measures and project design were to be accomplished by a subsequent study. The court found that this method violated both the substantive and procedural provisions of CEQA.

The irrevocable commitment to the project prior to completing full environmental studies makes this Environmental Impact Report vulnerable to a Sundstrom-like attack. Who determines when additional study is required? Who determines the adequacy of the additional study? How is the public allowed to comment as otherwise required by CEQA? Who determines the correct mitigation measures? How does the public comment on the proposed mitigation? Simply stated the postponement of necessary environmental work until after project approval eviscerates the heart of CEQA.

2. At page 6.7-33, mitigation 6.1-2 Construction Activities, Asbestos (project specific) suffers from the same infirmity. Asbestos studies of buildings are not to be performed unless asbestos fibers are suspected or identified. Why are these studies deferred until after the project is approved? In the section immediately above, the Environmental Impact Report explains, "asbestos - containing materials have been identified at the Sacramento Army Depot . . . some will remain in place. . . . construction activities at Sacramento Army Depot which could require the demolition and/or renovation of existing structures, possibly containing asbestos material, thereby exposing construction workers a

8-1  
Cont

8-2

3. At page 6.7-36, mitigation measure 6.7-4 Clean-up Interference (project specific) the proposed mitigation is too vague to be valuable. As to mitigation 6.7-4(b) how will the contractors "coordinate"? How can the agency assure that there will not be interference with remediation or project development activities on adjacent properties. Mitigation measures must be finite, certain and capable of mitigating the environmental impact. This mitigation measure provides no comfort that the impact will be mitigated. It is illusory in nature and serves no purpose.

8-3

4. There is no consideration of the potential impact to adjoining properties from contamination which may have migrated to those properties. What completed studies have concluded that the migration of contamination has not occurred? What remediation steps will be taken on behalf of adjoining properties and private ownership to assure those owners that a swift clean-up of the private property will occur? This Environmental Impact Report is legally deficient until adequate study has been completed to confirm the absence of migrated contamination.

8-4

5. The Environmental Impact Report concedes that the Sacramento Army Depot site contains significant contamination problems. Yet, contrary to the purpose of the California Environmental Quality Act, this EIR defers the major environmental impact until a time uncertain after the project has been approved. In so doing the Draft Environmental Impact Report cannot possibly notify decision makers and the public to the extent of the environmental impact. By deferring the necessary studies the public is deprived of a meaningful opportunity to understand the problem, and to comment on the nature of the problem and the proposed method of mitigation. This flaw is fundamental to the statutory scheme of environmental review in California and serves as the basis to upset the pending decision making.

8-5

The Trust is merely interested in protecting its property rights and being assured that it may enjoy the use of its private property without undo influence from the Army Depot site or contaminants which may have migrated to the property. This concern is not addressed in a meaningful fashion in this Environmental Impact Report. We would urge the drafters of the Environmental Impact Report to prepare a supplement to the Draft EIR. This supplement

Mark Kraft  
July 27, 1994  
Page 4

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8-5  
Cont.

will deal in a meaningful fashion with the potential problems adjoining properties may face unless United States Government meets its commitments under Federal and State environmental laws.

Please provide the undersigned with a copy of the Final EIR and written notice of public hearings concerning certification of the report.

Very truly yours,



STEVEN A. HERUM  
Attorney-at-Law

SAH:lam

cc: Dea Lee Harrison

**LETTER 8 RESPONSE TO COMMENTS OF STEVEN A. HERUM, NEUMILLER & BEARDSLEE****Response to Comment 8-1**

The Environmental Impact Report states that " Though significant efforts have been made to identify all sites of contamination on the Sacramento Army Depot site, the potential exists that unidentified sites of contamination are still present on the site." The Depot has undergone a rigorous investigation to identify potential areas of contamination. It is currently preparing an Environmental Baseline Survey (EBS) that will incorporate information from all prior studies and investigations along with employee interviews and site inspections. Any new contamination found during this process will be removed or cleaned up. The EBS is being reviewed by both Cal/EPA and USEPA, which have been involved in the Dept's Installation Remediation Program under a Federal Facility Agreement since 1988. As part of its investigation, the Depot identified 55 potentially contaminated sites. However, no matter how much work is done, there is always the potential that some contamination exists below the ground. In other words, full environmental studies will be completed and all remedial action will have been taken (as defined by CERCLA Section 120(h)) before the property can be deeded to a non-federal entity. The Army accepts full responsibility and liability for any contamination caused through its previous operation, and will continue to be available and willing to quickly address any regulated contamination located on or caused by the Depot. Mitigation measure 6.7-1 is simply intended as an additional protection and does not negate the Army's responsibility for full cleanup of base facilities prior to transfer.

**Response to Comment 8-2**

A comprehensive asbestos program has been completed at the Depot. All sources of asbestos (friable and non-friable) have been identified. All sources of friable asbestos that would affect worker health and safety will be removed before the transfer of facilities. However, all asbestos-containing materials (ACM) will not be removed. Therefore, Mitigation Measure 6.1-2 requires that all ACM be removed by a licensed asbestos abatement contractor prior to demolition or remodeling of existing buildings/facilities.

**Response to Comment 8-3**

The only circumstance where property can be transferred to a non-federal entity before all remedial action is completed is under the provisions of CERCLA section 120(h)(3). This statute defines the phrase "all remedial action has been taken" to include those situations where the construction and installation of an approved remedial design has been completed, and the remedy has been demonstrated to the Administrator (USEPA) to be operating properly and successfully. It specifically states, "The carrying out of long-term pumping and treating, or operation and maintenance, after the remedy has been demonstrated to the Administrator(USEPA) to be operating properly and successfully does not preclude the transfer of the property." There are very few locations that will be affected by this provision. In these circumstances, the deed will contain a clause granting the United States access to the property to conclude such long-term

operations. The city will control interference of these long-term cleanup programs through its building permit process. Thus mitigation measure for Impact 6.7-4 on page 6.7-36 of the Sacramento Army Depot Reuse Plan Draft EIR is revised to read as follows:

- ~~(a) The City shall coordinate with the U.S. Army, the U.S. EPA, the California EPA, and other involved agencies as appropriate to assure that the proposed development at Sacramento Army Depot does not interfere with any adjacent, and/or on-site remediation activities, or unduly delay either project development or area remediation.~~
- ~~(b) All contractors shall coordinate with the City, the U.S. Army, the U.S. EPA, the California EPA, and other involved agencies, as appropriate, to assure that construction activities do not interfere with any adjacent and/or on-site remediation activities or unduly delay either project development or site remediation.~~
- ~~(c) The City shall cooperate with the U.S. Army and the U.S. EPA and California EPA to ensure that EPA remediation priorities for Sacramento Army Depot are maintained.~~
- (a) All contractors shall coordinate with the City through its building permit process. Building permits shall not be issued by the City for activities that may interfere with the remediation of the Sacramento Army Depot until work at long-term remediation sites (as identified in the transfer documents) has been completed. The U.S. Army will provide the City with documentation from U.S. EPA and California EPA when remediation at a site is completed.
- (b) The City shall cooperate with the U.S. Army, U.S. EPA and California EPA through the Restoration Advisory Board to ensure that remediation priorities are maintained and development activities at the Sacramento Army Depot will not interfere with remediation activities.

#### Response to Comment 8-4

Extensive study has occurred and is continuing to occur with regard to off-post contamination. Page 6.7-24 describes the South Post Groundwater treatment Plant (SPGTP) and Figure 6.7-1 (page 6.76-14) (shows the approximate location of the TCE plume at concentrations greater than 5 ppb. Additional information is also provided in the EIS which has been incorporated by reference (see page 1-4). The Remedial Investigation/Feasibility Study and Record of Decision (ROD) were completed in 1989 and are part of the Installation Restoration Program Administrative Record. Presently, the SPGTP extracts and treats up to 648,000 gallons of water per day. The treatment system destroys the volatile organic compounds in the groundwater and restores it to current drinking water standards. The treatment system is expected to be in operation until 2007. The Army is currently exploring the possibility of installing horizontal wells into the center of the plume to expedite treatment. Because of these new developments,

the second paragraph under "South Post Groundwater Treatment Plant and Groundwater Treatment" will be revised to read as follows"

*In accordance with the ROD, on-site groundwater is currently being extracted and treated at the rate of 648,000 gallons per day. The treatment system consists of seven extraction wells and an ultraviolet/oxidation process. The treatment system has been effective in destroying VOCs in the groundwater and restoring it to current drinking water standards without residual air emission or hazardous waste byproducts. The system is expected to be in operation until 2007. To expedite the remediation process, four additional wells (two vertical wells and two horizontal wells with 600-foot screens) are being studied. Installation of additional extraction wells is anticipated before December 1994.*

#### **Response to Comment 8-5**

As responses to the previous comments indicate, the U.S. Army is moving very expeditiously to remediate all contamination. It is anticipated that the Sacramento Army Depot will be removed from the National Priority List early in 1995. With the exception of long-term remediation program, all contamination will be remediated prior to the transfer of the property to non-federal entities. Necessary studies have not been deferred. The Installation Remediation Program at the Sacramento Army Depot has been ongoing since 1988. Its Administrative Record is available to the public. The Army has had an extensive community involvement program to keep interested parties informed of its remediation programs. Presently, the Army sponsors the Restoration Advisory Board (RAB). Its purpose is to provide the community with an opportunity to understand and have a voice in the remediation programs. The RAB meets monthly and its meetings are advertised in the Sacramento Bee. Further, information relating to the cleanup program are available in the Sacramento Army Depot Environmental Impact Statement and in the Sacramento Army Depot Administrative Record. Both documents are located at the Dept's Pass and ID Office.

DOUGLAS M. FRALEIGH, Administrator  
WARREN H. HARADA, Director  
Public Works Administration  
F.I. HODGKINS, Director  
District Engineering  
H.D. KERTON, Director  
Solid Waste Management  
TERRY T. TICE, Director  
County Engineering



# COUNTY OF SACRAMENTO

## PUBLIC WORKS AGENCY

COUNTY ADMINISTRATION BUILDING  
827 SEVENTH STREET, ROOM 304  
SACRAMENTO, CA 95814

Phone: (916) 440-6581  
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August 2, 1994

Mark Kraft  
City of Sacramento  
Planning Division  
1231 I Street, Room 301  
Sacramento, CA 95814

Subject: **DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
SACRAMENTO ARMY DEPOT REUSE PLAN (M94-020)**

Dear Mr. Kraft:

In response to your request for comments regarding the above cited project, the following is a summary of replies from various Public Works agencies of Sacramento County:

1. Public Infrastructure Planning and Financing Section - No comments.
2. Transportation Division - No comments.
3. Water Resources Division (Flood Control) - See the attached memo from James Paluck dated July 28, 1994.
4. Water Resources Division (Water Supply) - No comments.
5. Water Quality Division - See the attached memo from Bob Lilly dated July 28, 1994.

9-1

If you have any questions regarding this response, please call Bob Davison at 440-6525.

Sincerely,

Douglas M. Fraleigh, Administrator  
Department of Public Works

DMF:cwc/94-40  
Attachments

cc: F.I. Hodgkins	Warren Harada	Keith DeVore
Terry Tice	Robert Shanks	Tom Zlotkowski

**LETTER 9 RESPONSE TO COMMENTS OF DOUGLAS M. FRALEIGH, COUNTY OF SACRAMENTO PUBLIC WORKS AGENCY**

**Response to Comment 9-1**

The comment is noted and will be forwarded to the Sacramento City Council for consideration in the decision-making process.

DOUGLAS M. FRALEIGH, Administrator  
WARREN H. HARADA, Director  
Public Works Administration  
F.I. HODGKINS, Director  
District Engineering  
H.D. KERTON, Director  
Solid Waste Management  
TERRY T. TICE, Director  
County Engineering



# COUNTY OF SACRAMENTO

WATER RESOURCES DIVISION.....KEITH DEVORE, Chief  
County Administration Building Phone: (916) 440-6851  
827 Seventh Street, Room 301 Fax: (916) 552-8693  
Sacramento, California 95814

July 28, 1994

Letter 10

Mark Kraft  
City of Sacramento  
Planning Division  
1231 I Street, Room 300  
Sacramento, CA 95814

**SUBJECT: Comments on the Draft EIR for the Sacramento Army Depot Reuse Plan**

The Sacramento County Water Resources Division (WRD) has the following comments on the above subject Draft EIR.

Within the report, Mitigation Measures 6.4-2 & 3, which discuss the Hydrology-Drainage Facility Capacity Impact (Project Specific & Cumulative respectively) indicate that:

*The City of Sacramento shall review each development application for the Army Depot site for effects on drainage facility capacity. Each project reviewed shall identify the rate and amount of surface water runoff generated by proposed development and the effects on drainage facility capacity. Modifications to existing facilities and new facilities to regulate rate and volume of runoff released to Morrison Creek shall be identified, and each project shall pay a fair share portion of any improvement identified. Drainage facilities could include, but would not be limited to:*

- (a) *The expansion or modification of existing storm drain facilities;*
- (b) *Single-project detention basins; or*
- (c) *The preservation of natural drainage areas.*

It has been required for past projects within the Morrison Creek basin of Sacramento County that the level of significance of the proposed project 100-year flows to Morrison Creek and Beach-Stone Lakes be identified within the DEIR. Furthermore, the proposed measures to mitigate for the increased runoff associated with the project should also be identified within the DEIR. This is required to ensure that the proposed project will not adversely impact downstream properties along Morrison Creek, or the Beach-Stone Lakes area.

10-1

The DEIR for this project currently has no conceptual plans indicating how the ultimate drainage system will be designed and constructed. Regional flood control measures, such as trunk drainage, channel improvements, and detention facilities are typically not constructed on a project-by-project basis. In a worst case scenario, each development application for the Army Depot site could be in the form of building permits, where mitigation measures typically cannot be enforced. WRD therefore requests that, at a minimum, a conceptual plan of the ultimate drainage system for the Army Depot site should be prepared as part of the DEIR.

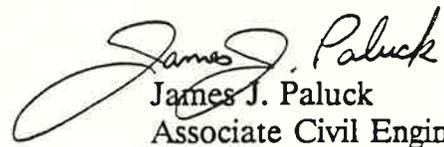
10-1  
Cont

WRD is requesting that the above subject DEIR include a discussion of the following:

- (1) The level of significance of the proposed project 100-year flows to Morrison Creek (County portion) and Beach-Stone Lakes.
- (2) The proposed measures to mitigate for the increased rate and volume of runoff to Morrison Creek and Beach-Stone Lakes.
- (3) A conceptual plan of the ultimate drainage system for the Army Depot site.

If you have any questions, please feel free to call me at 440-6851.

Sincerely,

  
James J. Paluck  
Associate Civil Engineer

302/13.08  
JJP:jjp

cc: Craig Crouch  
Steve Pedretti  
Terri Wegener

**LETTER 10 RESPONSE TO COMMENTS OF JAMES PALUCK, COUNTY OF  
SACRAMENTO WATER RESOURCES DIVISION**

**Response to Comment 10-1**

There is general agreement with the main point of Comment 10-1, namely that the impact of Sacramento Army Depot reuse project on the rate and volume of stormwater discharged from the Depot to receiving waters is a legitimate concern which should be addressed in the subject Environmental Impact Report. However, at this time it would be impractical for the Environmental Impact Report to identify any drainage plan as the ultimate plan. A few options have passed through the earliest stage of development, and other options may yet be developed. A scope of work for a drainage study, to identify drainage improvements and mitigation measures, has been drafted and is under internal review. When constructed, these improvements will assure that the rate and volume of stormwater releases to Morrison Creek and Beach Stone Lakes will have no negative impact. This scope will be part of the infrastructure study which will be performed by a consultant under contract to the City of Sacramento. The concern is shared regarding enforcement of single-project on-site mitigation measures, however, this concern is not prohibitive. Single-project mitigation measures are a practical alternative, particularly during the interim period prior to the construction of the ultimate drainage plan. Until the drainage study has been completed, the City of Sacramento will require any drainage improvements or reuse projects to include appropriate mitigation measures.

## GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET  
SACRAMENTO, CA 95814

Letter 11

August 1, 1994

MARK KRAFT  
CITY OF SACRAMENTO  
1231 I STREET  
ROOM 200  
SACRAMENTO, CA 95814

Subject: ARMY DEPOT REUSE PLAN PROJECT SCH #: 94032090

Dear MARK KRAFT:

The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

11-1

Please call Mari Lemos at (916) 445-0613 if you have any questions regarding the environmental review process. When contacting the Clearinghouse in this matter, please use the eight-digit State Clearinghouse number so that we may respond promptly.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael Chiriatti, Jr.", written over a faint, illegible background.

Michael Chiriatti, Jr.  
Chief, State Clearinghouse

**LETTER 11 RESPONSE TO COMMENTS OF MICHAEL CHIRIATTI, JR.,  
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH**

**Response to Comment 11-1**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process.



August 1, 1994

Sacramento Regional  
Transit District  
A Public Transit Agency  
and Equal Opportunity Employer

Mailing Address:  
P.O. Box 2110  
Sacramento, CA 95812-2110

Administrative Office:  
1400 29th Street  
Sacramento, CA 95816  
(916) 321-2800  
29th St. Light Rail Station  
(916) 363-5067

Light Rail Office:  
2700 Academy Way  
Sacramento, CA 95815  
(916) 648-8400

Mark Kraft  
Planning Division  
CITY OF SACRAMENTO  
1231 I Street, Room 300  
Sacramento CA 95814

NAME OF DEVELOPMENT: Army Depot Reuse Plan  
TYPE OF DOCUMENT: Draft Environmental Impact Report (DEIR)  
CONTROL NUMBER: (M94-020)  
DATE RECEIVED AT RT: June 30, 1994

Regional Transit (RT) staff has reviewed the DEIR for the Army Depot Reuse Plan and would like to provide the following comments.

Page 6.2-4, Existing Transit Service, Light Rail

Please revise ¶1 as follows: "Regional Transit ~~Metro~~ light rail service is provided adjacent to Folsom Blvd. approximately 1.5 miles north of the project site. The Power Inn and College Greens *light rail* stations provide access to ~~the Metro line in the vicinity of~~ Power Inn Road and Florin-Perkins Road, respectively. Service is provided ~~on~~ *with* 15 minute ~~headways~~ *frequencies* ~~throughout the weekday during the day, and 30 minute frequencies in the evenings.~~ Available ~~RT Metro capacity consists of 700 persons per train (standing room, 4 cars x 175 passengers per car).~~ *Peak period light rail capacity is approximately 500 persons per four car train.*"

12-1

Page 6.2-4, Existing Transit Service, Bus Service

The following information will provide an update on bus service changes that will affect the Army Depot site. On June 20, 1994, the RT Board of Directors approved system-wide bus service changes that are designed to improve service frequencies and simplify bus service on major streets in Sacramento. The effective date for these service changes is proposed for

12-2

12-2  
Cont.

September 4, 1994. One of these changes includes a new bus route to serve the Army Depot site. This new route would operate with 30 minute frequencies along Florin-Perkins, Fruitridge, and Power Inn Roads and Folsom Boulevard in a clockwise direction, linking the Army Depot site to both the Power Inn and College Greens light rail stations. A route map illustrating this service is enclosed.

Page 6.2-29. Transit Impacts and Mitigations

Mitigation 6.2-12: In addition to the mitigation measures recommended in this paragraph, RT requests the following measures be included to mitigate the impacts to transit service: (1) capital **and operating** subsidies be provided to RT to assist in funding bus service to the Army Depot site, and (2) a bus turn around facility be provided at the Army Depot site, which will allow RT greater routing and schedule flexibility. The bus turn around location should be developed with RT's input and in accordance with RT's design standards, and should be directly accessed from Fruitridge Road (probably in the vicinity of Marshall and Midway Avenues).

12-3

RT appreciates the opportunity to provide comments on the DEIR on the Army Depot Reuse Plan. If you have any questions, please contact Nancy Tronaas, Planner, at 321-2871.

Sincerely,



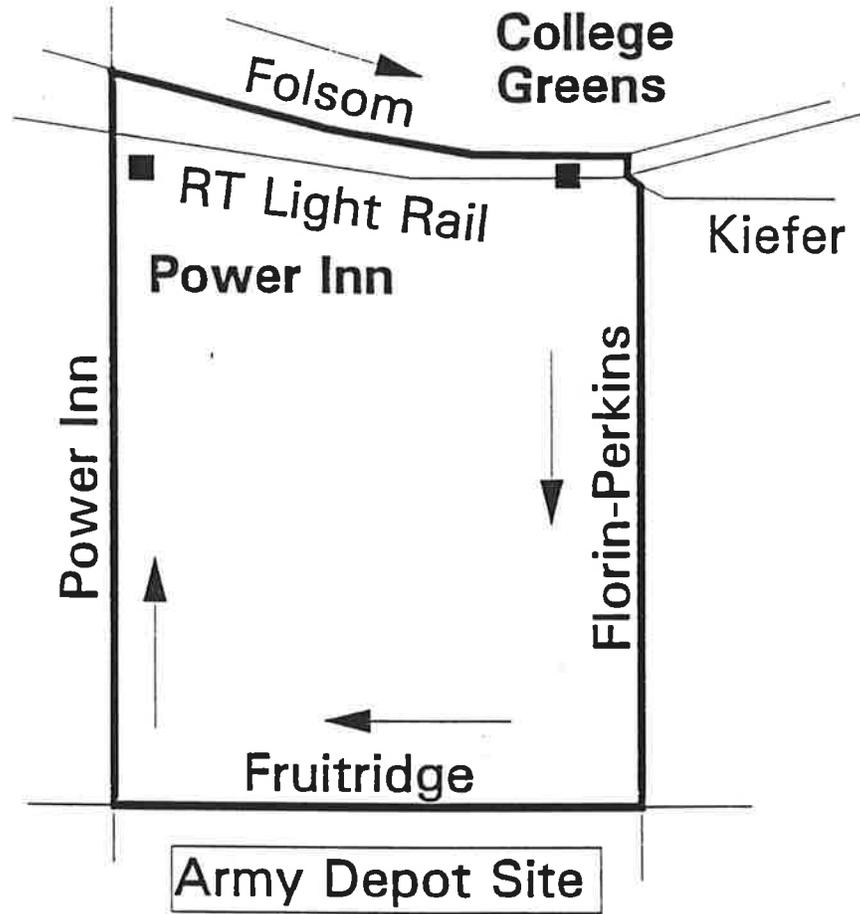
Anthony J. Palmere  
Planning Manager

Enclosure

c: Nancy Tronaas, Planner, RT

# Route 8 Army Depot

Planning Department 6/08/94



## LETTER 12 RESPONSE TO COMMENTS OF ANTHONY J. PALMERE, SACRAMENTO REGIONAL TRANSIT DISTRICT

### Response to Comment 12-1

The comment is acknowledged and the DEIR is hereby amended to reflect the information contained in the above comment. The text in the first paragraph on page 6.2-4 is amended as follows:

Regional Transit Metro light rail service is provided adjacent to Folsom Blvd approximately 1.5 miles north of the project sit. The Power Inn and College Greens light rail stations provide access to the Metro line in the vicinity of Power Inn Road and Florin Perkins Road respectively. Service is provided on with 15 minute headways frequencies throughout the weekday during the day, and 30 minute frequencies in the evenings. Available RT Metro capacity consists of 700 persons per train (standing room, 4 cars x 175 passengers per car). Peak period light rail capacity is approximately 500 persons per four car train.

### Response to Comment 12-2

These system changes were approved following completion of the DEIR, and the text above is the most current information regarding bus service to the Army Depot site.

### Response to Comment 12-3

Transit mitigation measures, including subsidies may be selected as part of TMP programs developed for individual businesses as the site is occupied. The development of a RT bus turn around location on-site is possible and should be add to the Reuse Plan Circulation Plan. The suggested location is in the approximate center of site about 1/2 mile from Fruitridge Road.

FROM: See return address on reverse.		DATE
WRITER'S NAME/TELEPHONE NO.		
Allan Oto, Chief, Sacramento Basin Branch		557-6770
<input checked="" type="checkbox"/> YOUR <input type="checkbox"/> OUR COMMUNICATION (Kind, reference symbol, date, subject, or other identification) Draft Environmental Impact Report for the Sacramento Army Depot Reuse Plan (M94-020)		
ACTION TAKEN OR REQUESTED		
<input type="checkbox"/> REPLY WILL BE FURNISHED ON OR ABOUT _____ <input type="checkbox"/> REQUEST DATE WHEN REPLY MAY BE EXPECTED <input type="checkbox"/> WE HAVE SENT YOUR COMMUNICATION TO (See below)		<input checked="" type="checkbox"/> RECEIPT ACKNOWLEDGED <input type="checkbox"/> FOR DIRECT REPLY <input type="checkbox"/> TO OBTAIN INFORMATION
We have reviewed the application, and the proposed project will not conflict with any project or other programs within our jurisdiction.		
<input checked="" type="checkbox"/> OTHER INFORMATION <input type="checkbox"/> SUPPLIED OR <input type="checkbox"/> REQUESTED Thank you for coordinating with us.		
TYPED NAME, GRADE, AND TITLE WALTER YEP Chief, Planning Division		SIGNATURE 

13-1

DA FORM 209, 1 Jan 70 REPLACES EDITION OF 1 NOV 66, WHICH WILL BE USED.  
 U.S. GPO: 1988-201-424/80327

DELAY, REFERRAL, OR FOLLOW-UP NOTICE  
 (AR 340-15)

**LETTER 13 RESPONSE TO COMMENTS OF WALTER YEP, U.S. ARMY CORPS OF ENGINEERS**

**Response to Comment 13-1**

The comment is noted and will be forwarded to the Sacramento City Council for their consideration in the decision-making process.

*Dea Lee Harrison*

1627 Berkeley Way  
Berkeley, Cal 94703

510/844-4216

Mark Kraft  
City of Sacramento  
Planning Division  
1231 I Street, Room 300  
Sacramento, CA 95814

14-1

RE: Draft Environmental Impact Report for the Sacramento Army Depot Reuse Plan (M94-020)

Enclosed is a copy of a letter of July 27, 1994 by Steven A. Herum on behalf of the Van der Boom family trust, of which I am one of the co-trustees.

With regard to the issues raised in this communication I feel that I must PROTEST the draft EIR and any transfer of federal property to the City of Sacramento unless there is adequate assurance of clean up by the Federal government (or if the City takes title to the land, acceptance of this responsibility by the City of Sacramento) of the property adjacent to the depot which has become contaminated by the depot and additionally that appropriate attention is given to all of the issues raised in Mr. Herum's letter.

The DEIR does not properly address the issue of contamination of adjacent property; and until this matter is satisfactorily addressed the DEIR is unacceptable.

I would request that this letter be formally responded to and that it and the enclosure be read into the minutes of the hearing August 25, 1994.

I would also like to remind you of our phone conversation of August 4, 1994 during which you agreed to send me the details of the ground water contamination and clean up on the depot. You also offered to contact the Army Depot EIR representative with regard to the responsibility of the Federal government to clean up all contamination including that caused to adjacent property.

Thank you for your consideration,

*Dea Lee Harrison*

DEA LEE HARRISON  
Co-trustee  
1627 Berkeley Way  
Berkeley, CA 94703

c. Steven Herum

## LETTER 14 RESPONSE TO COMMENTS OF DEA LEE HARRISON

### Response to Comment 14-1

Although this letter was received after the close of the public comment period on the Sacramento Army Depot Reuse Plan Draft EIR, the comment will be provided a response in this Final EIR.

The letter referenced in the comment is included in this Final EIR as Letter 8 and is responded to under Response to Comments 8-1 through 8-5. The remainder of the comment reiterates the concerns of Letter 8. The Response to Comments 8-1 through 8-5 provide detailed responses to the comments presented in Letter 14, and the reader is, therefore, directed to the responses to Letter 8.

## **5. ERRATA TO THE DRAFT EIR**

## 5. ERRATA TO THE DRAFT EIR

The following changes to the Sacramento Army Depot Reuse Plan Draft EIR are noted below. The changes to the Draft EIR as they relate to issues contained within this errata sheet do not affect the overall conclusions of the draft environmental document. The changes are identified by the comment reference.

### Response to Comment 2-2

Page 6.6-13, third sentence from the bottom of the third paragraph is amended to read:

~~Additionally, the on-site sewage collection system will need to be upgraded, is adequate to handle flow generated by the proposed project. However, minor portions of the system will need to be repaired and the system would need to be extended to serve the southerly portion of the site.~~

### Response to Comment 6-25

The discussion for Alternative B under Impact 6.5-6 on page 6.5-24 is amended to read as follows:

- AB The proposed project in conjunction with cumulative development will potentially result in the loss of Swainson's hawk foraging wildlife habitat. This is considered a **significant impact**.

### Response to Comment 8-3

Mitigation Measure 6.7-4 on page 6.7-36 is amended as follows:

- ~~(a) The City shall coordinate with the U.S. Army, the U.S. EPA, the California EPA, and other involved agencies as appropriate to assure that the proposed development at Sacramento Army Depot does not interfere with any adjacent, and/or on-site remediation activities, or unduly delay either project development or area remediation.~~
- ~~(b) All contractors shall coordinate with the City, the U.S. Army, the U.S. EPA, the California EPA, and other involved agencies, as appropriate, to assure that construction activities do not interfere with any adjacent and/or on-site remediation activities or unduly delay either project development or site remediation.~~
- ~~(e) The City shall cooperate with the U.S. Army and the U.S. EPA and California EPA to ensure that EPA remediation priorities for Sacramento Army Depot are maintained.~~

- (a) **All contractors shall coordinate with the City through its building permit process. Building permits shall not be issued by the City for activities that may interfere with the remediation of the Sacramento Army Depot until work at long-term remediation sites (as identified in the transfer documents) has been completed. The U.S. Army will provide the City with documentation from U.S. EPA and California EPA when remediation at a site is completed.**
- (b) **The City shall cooperate with the U.S. Army, U.S. EPA and California EPA through the Restoration Advisory Board to ensure that remediation priorities are maintained and development activities at the Sacramento Army Depot will not interfere with remediation activities.**

### **Response to Comment 12-1**

On page 6.2-4, the first paragraph is amended to read:

Regional Transit ~~Metro~~ light rail service is provided adjacent to Folsom Blvd approximately 1.5 miles north of the project sit. The Power Inn and College Greens light rail stations provide access to ~~the Metro line in the vicinity of~~ Power Inn Road and Florin Perkins Road respectively. Service is provided ~~on~~ with 15 minute ~~headways~~ frequencies throughout the ~~weekday~~ during the day, and 30 minute frequencies in the evenings. ~~Available RT Metro capacity consists of 700 persons per train (standing room, 4 cars x 175 passengers per car).~~ Peak period light rail capacity is approximately 500 persons per four car train.

## APPENDIX

**TABLE A-1  
ARMY DEPOT DRIVEWAY VOLUMES (JANUARY 1993)**

DRIVEWAY LOCATION	DAILY VOLUME	AM PEAK TRAFFIC HOUR			PM PEAK TRAFFIC HOUR		
		IN	OUT	TOTAL	IN	OUT	TOTAL
<u>Fruitridge Road Access</u>							
Westerly Access Peak Traffic Hour of Adjacent Street*	2,980	56	12	68	9	199	208
Peak Traffic Hour of Site (5:30-6:30 a.m.)		442	0	442	15	328	343
<u>Easterly Access at 84th St.</u>							
Peak Traffic Hour of Adjacent Street*	2,770	56	15	71	12	92	104
Peak Traffic Hour of Site (5:15-6:15 a.m.)		236	23	259	25	231	256
<u>Easterly Access</u>							
Peak Traffic Hour of Adjacent Street*	709	30	18	48	2	89	91
Peak Traffic Hour of Site (6:00-7:00 a.m.)		135	67	202	2	160	162
<u>Florin Perkins Access</u>							
Northerly Access at Thys Ct. Peak Traffic Hour of Adjacent Street*	5,140	78	24	102	17	239	256
Peak Traffic Hour of Site (4:30-5:30 a.m.)		556	14	570	38	548	586
<u>Southerly Access</u>							
Peak Traffic Hour of Adjacent Street*	920	0	0	0	13	154	167
Peak Traffic Hour of Site (5:30-6:30 a.m.)		188	94	282	22	190	212
<b>Total Daily</b>	<b>12,519</b>						

\* Peak hour of adjacent street traffic (7:15 - 8:15 a.m., 4:15 - 5:15 p.m.)

## APPENDIX A-1

### Existing Site Activity Concurrent With Existing Base Data Collection

Existing traffic volume data in the study area compiled for this analysis was initially collected in 1993. As roadway and intersection traffic counts reflect some level of activity at the Army Depot site, this activity was quantified to present a baseline of traffic data against which the impacts of the proposed reuse plan can be measured against. To determine the net effect of future development of the site with elimination of the Army Depot, traffic volumes at the entrances to the site were monitored on a daily and AM/PM peak hour basis. Observed driveway activity at the site is outlined in Table A-1.

Access to the site and Army Depot facilities is provided via five primary driveway locations. These consist of three access points to Fruitridge Road and two driveways along Florin Perkins Road. Two of the access locations along Fruitridge Road, as well as the Thys Court access to Florin Perkins Road, are signalized.

As shown in Table A-1, the Army Depot site was found to generate a total of 12,500 daily trips at the five driveways. Current shift schedules at the Army Depot result in peak periods of activity prior to the morning and evening peak hours of the adjacent streets. In general, peak inbound traffic volumes occur in the morning from about 5:00 - 6:00 a.m., with outbound traffic somewhat more dispersed throughout the afternoon, typically peaking from about 3:00 - 4:00 p.m..

Traffic generated by the site during the hours of peak activity on the adjacent streets (ie., 7:00-9:00 a.m. and 4:00-6:00 p.m.) consists of approximately 3% of the total daily volume in the morning and 6% of the total daily volume occurring in the afternoon peak traffic period.