

**IS/MND
ATTACHMENT 1**

**ADVANCED HEALTHCARE OF SACRAMENTO (PR 14-038)
PUBLIC COMMENTS &
RESPONSE TO COMMENTS
DRAFT INITIAL STUDY / MITIGATED NEGATIVE
DECLARATION**

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Comment Letter A – Governor’s Office of Planning and Research

Response

The City of Sacramento (City or Lead Agency) submitted the draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Advanced Health Care of Sacramento (project) to the State Clearinghouse for circulation to public agencies on January 23, 2015. The 30-day public comment period closed on February 23, 2015. In addition, the City noticed the IS/MND locally through the County of Sacramento’s clerk office. The comment letter confirms the status of review.

Comment Letter B – Regional San

Response

The City acknowledges that Sacramento Regional County Sanitation District (SRCSD) sewer impact fees are applicable to the proposed project. The City of Sacramento will coordinate with SRCSD prior to issuance of a building permit for the proposed project to determine sewer impact fees.

Comment Letter C – Central Valley Regional Water Quality Control Board

Response

The proposed project would result in the disturbance of one or more acres of soil and is thus subject to the Construction Storm Water General Permit as regulated by the Regional Water Quality Control Board (RWQCB). The City is required to adhere to this permit and will have a Storm Water Pollution Prevention Plan prepared per the Construction General Permit. Likewise, the City must require industry standard construction Best Management Practices (BMP) prior to and during construction of the proposed project. Storm water discharges must comply with the regulations outlined in the Industrial Storm Water General Permit as regulated by the RWQCB. The proposed project is subject to neither Section 404 nor Section 401 of the Clean Water Act as there are not identified impacts to waters of the U.S. or waters of the State. No surface water drainage realignment is involved and the project is not subject to the Streambed Alteration Agreement as regulated by the California Department of Fish and Wildlife. The project site will not be used for commercially irrigated agriculture. Construction of the proposed project will not require dewatering.

Comment Letter D – Mr. Thomas Powell

Response D-1

The quotation identified in the comment is located on Page 58 of the Draft IS/MND; no additional response is necessary.

Response D-2

Potential impacts to public services (e.g., fire protection, police protection, and schools) are analyzed in Section 9 of the Draft IS/MND. The City determined that impacts to public services would be less than significant. The proposed project consists of a surgical and stroke recovery center and short-term skilled nursing facility. The General Plan land use designation is “Suburban Center” and the zoning is C-2-LI (General Commercial) which is compatible with the proposed land use. The proposed use meets the definition of a major medical facility per zoning definition. A major medical facility may be allowed in the C-2 zone with the approval of a conditional use permit. A major medical facility also requires a conditional use permit in the H zone. A rezone to Zone H is not required.

Response D-3

As stated in Section II – Project Description (Page 4 of the Draft IS/MND), the project site is located in an urbanized portion of the community, with many commercial and light industrial uses in the near vicinity. It was accounted for in the City’s 2030 General Plan, and Master Environmental Impact Report (MEIR), and the project is consistent with the General Plan land use designation (Suburban Center); additionally, it would not require any change to the current zoning (C-2-LI, or General Commercial). The project is consistent with the 2035 General Plan and MEIR as well.

Per the City’s zoning map book, the subject site has been zoned as General Commercial Labor Intensive Overlay (C-2-LI) since early 2000. On November 18, 1999 the Planning Commission approved entitlements (P99-069) necessary to develop a seven story, 120-room hotel building totaling 84,300 square feet, including 8,100 square feet of exhibit space, on the adjacent site to this project with off-site parking on various parcels including the subject parcel. On January 16, 2002, the Zoning Administrator approved with conditions a Special Permit Time Extension and a Variance Time Extension to construct the aforementioned hotel (Z01-207). On June 20, 2007, the Design Commission approved the project to construct seven single-story buildings ranging in size from 9,510 square feet to 12,881 square feet on multiple parcels totaling 8.84 acres (DR04-187) including the subject site. The subject site is currently vacant with no development.

Response D-4

The Grant Deed and Title Insurance Policy, included as attachments to these responses, include information regarding the legal owner of the subject property. The current legal status of the project site is not relevant to CEQA analysis.

Response D-5

Along the southern portion of the project site there is an existing 15’ private sewer easement running east to west. This easement traverses across the entire width of the project site. The existing sewer line conveys untreated raw sewage through the project site from the adjacent property (APN 275-0260-068) to the east. This sewer line is for the collection of the building sewer only and neither conveys storm runoff nor is a drain line from the adjacent lake. There is also an existing 10’ electrical and communications easement for the Sacramento Municipal Utility District (SMUD) and Pacific Gas & Electric (PG&E) company that runs parallel with the

existing sewer easement mentioned above. Just south of the electrical easement and contiguous to Expo Parkway is a public storm drain easement. At the southeast corner of this property, there is a 10' wide private storm drain easement that comes into the property approximately 33' adjacent to the east property line. The existence of these easements do not affect the impact analysis or conclusions included in the Draft IS/MND.

Response D-6

The City correctly relies on the population projections outlined in the 2030 General Plan MEIR for determining impacts to this environmental topic area in the Draft IS/MND. The proposed project consists of a surgical and stroke recovery center and short-term skilled nursing facility and would not result in an increase in population, or an indirect requirement for new housing, due to project construction and operation. Development of the project site was previously envisioned and analyzed under the 2030 General Plan MEIR for the project's underlying land use designation and zoning; this analysis took into consideration the water demands required by the proposed project. The project is consistent with the 2035 General Plan and MEIR as well.

Response D-7

The Draft IS/MND incorrectly stated that State Route 160 is located approximately 0.7 miles from the project site. State Route 160 is located approximately 400 feet to the north from the northern border of the project site. This inadvertent error neither changes the impact analysis nor conclusions of the Draft IS/MND. The proposed project consists of a surgical and stroke recovery center and short-term skilled nursing facility and does not propose locating residences within 500 feet of a state route. As stated on Page 19 (Question G) of the Draft IS/MND, "CARB's Land Use Handbook recommends that a site specific health risk assessment be performed for projects that would locate residences or other sensitive land uses within 500 feet of a freeway, urban road with 100,000 vehicles per day (or more), or rural road with 50,000 vehicles per day (CARB 2005). The project site is not located near any major freeway but is located near State Route 160, which is classified as an urban road. According to the ... 2030 General Plan MEIR, the Average Daily Trips (ADT) for the segment of State Route 160 in front of the project site would be 45,900 ADT ... with buildout of the General Plan." District 3 State Route 160 Transportation concept Report (California Department of Transportation, 8/8/2014) reported that the segment of SR 160 within the project vicinity has a base year AADDT of 43,500 trips with a projected 20 years horizon to a maximum AADDT of 57,207 trip. As a commercial land use located adjacent to an urban road with less than 100,000 ADT, a Health Risk Assessment is not required or warranted for the proposed project.

Response D-8

A Jurisdictional Delineation and Special Status Species Assessment (Gibson & Skordal 2014) was prepared for the project site and appended to the Draft IS/MND. Based on the results of this report no water features were mapped within the study area. This conclusion is supported by substantial evidence. As the commenter fails to raise any issue regarding the conclusions made in the Draft IS/MND, further response is unwarranted.

Response D-9

The reader is referred to Response D-8 above.

Response D-10

As stated on Page 2 of the Jurisdictional Delineation and Special Status Species Assessment (Gibson & Skordal 2014), as appended to the Draft IS/MND, the [project] site consists of highly disturbed non-native annual grasslands. Plants consisted of soft chess (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), barley (*Hordeum murinum*), yellow star-thistle (*Centaurea solstitialis*), and wild oats (*Avena fatua*). The only woody species present were two valley oaks (*Quercus lobata*).” Surveys were conducted on June 5, 2014 (during the appropriate blooming season).

Response D-11

Please refer to the attached Grant Deed and Title Insurance Policy for information regarding the legal owner of the subject property. The project site is maintained for wildfire suppression and weed abatement purposes, as required by the City, as evidenced by regular mowing operations. As stated on Page 12 of the Jurisdictional Delineation and Special Status Species Assessment (Gibson & Skordal 2014), elderberry (*Sambucus* sp.) habitat is not present on the project site but may be present adjacent to the American River. The proposed project would not impact elderberry shrubs located off the project site.

Response D-12

The commenter implies that restoring the project site to pre-1930 conditions would be a better land use option than the proposed project. This comment does not question the content or accuracy of the Draft IS/MND and further response is unwarranted.

Response D-13

The statement on Page 33 of the Draft IS/MND (“the project site is a vacant lot and has not been previously developed”) is an accurate depiction of the baseline project site conditions.

Response D-14

The reader is referred to Responses D-4, D-5, and D-11 above.

Response D-15

The commenter appears to be concerned about the early historic route from Sacramento to Marysville. On the 1885 map (available on line on the Library of Congress website), the Marysville Road can be seen approximately 0.5 miles north of the project site. This road is the route of Del Paso Boulevard, with Marysville Boulevard splitting off Del Paso Boulevard, showing that this is the former road to Marysville, later renamed. This road course can be clearly seen on both the 1911 Brighton and Official County maps. There is no early roadway within the

current project area. The course of an early roadway appears to have become Del Paso Road/Marysville Boulevard.

Response D-16

The City's 2030 General Plan MEIR analyzed the potential impact on hydrology from development that could occur consistent with the general plan, and concluded that, with implementation of the identified policies individual projects would have no net increase on storm water runoff and impacts were less than significant. Construction of the proposed project would result in approximately 80 percent impervious surface on the project site. Currently the project site has a paved road and turn around area that creates approximately 7 percent impervious surface. The City's design standards require development to design the storm drain system for the 10 year event and overland release for the 100 year event. This drainage discharges into the City's drainage corridor approximately 200 feet to the west. From there, the water drains south to the City's Sump Pump No. 151 approximately 600 feet south. Due to the proximity to the drainage way, the project site's peak runoff will be required to enter the drainage way (pending an approved drainage study per the aforementioned General Plan policies) and reach the City's Sump Pump No. 151 prior to drainage from Woodlake reaching Sump Pump No. 151. The residential areas north of State Route 160 have multiple detention basins that hold the storm runoff in the Charlesgate Detention Basin, Woodlake Detention Basin, and Ice House Detention Basin. The project site is required to provide a permanent water quality BMP system which is consistent with National Pollution Discharge Elimination System (NPDES) permit requirements of the Regional Water Quality Control Board. The stormwater system, as designed and implemented, will meet all the City's standards for water quality and hydrologic control of runoff.

Response D-17

The City's Sump Pump No. 151 was designed to drain a large watershed of which the project site is part. Per FIRM panel 0177H, the project site is located within Zone X (Areas of 0.2 percent annual chance flood). Elevation of the project site and/or proposed project is not required per FEMA regulations nor any City requirement.

Response D-18

The commenter suggests that the calculation used for the proposed project's vehicle trips/peak hours is flawed. However, no additional information is provided and further response is unwarranted. Please refer to Response D-19, below, for additional information about potential traffic impacts associated with the proposed project.

Response D-19

The project trip generation estimate is based on information provided by the Institute of Transportation Engineers (ITE) Trip Generation, 9th Edition. ITE 620 for Nursing Home land use was used in the estimation of the peak hour trips using the size of the building as the variable for the calculations. The development project is expected to generate 17 trips during the morning peak hour (7am-9am), 23 trips during afternoon peak hour (4pm-6pm), and 240 daily trips. According to the information about staffing and changing in shifts, the overlap between the

shifts occurs during the off peak hours as discussed below. The trips generated by the project will not have a significant effect on surrounding roadways or intersections.

The proposed project will be staffed continuously over a 24-hour period. However, the number of staff will vary depending on the time of day. In general staff work either from 7am until 3pm (day shift), from 3pm until 11pm (afternoon shift), or from 11pm until 7am (evening shift). However, some of the day and afternoon staff will overlap for about an hour (most likely between 2pm-3pm). During this hour it is possible that there may be as many as 44 employees in the building. The reason for the overlap is to make sure that the nursing staff coming in to work on the afternoon shift know the condition of the patients at that time and are able to communicate with the nursing staff that worked with those patients in the morning. During the evening shift it is anticipated that there may be as few as five staff in the building. Certain staff members, such as the Executive Director and the Director of Nursing, will usually work a normal “business” day, between 8am and 5pm. In summary, between 8am and 5pm (except for the one-hour overlap between 2pm and 3pm) it is anticipated that there will be approximately 38 staff in the building. It is not anticipated that physicians will be spending a significant amount of time in this facility; the staff physician is available on an on-call basis. It is also not anticipated that there will be facility employees with the designation of “orderly”, “pharmacist”, or “van driver.” The Executive Director is the “administrator.”

Response D-20

Please see Response D-19. There may be as few as five employees leaving the facility at 7am and as many as 38 arriving between 6 and 8am (anticipated am peak period of the project). A peak hour on the adjacent street (one hour between 7am and 9 am) does not always coincide with the peak hour of a project (peak hour of trip generator). Most of those who arrive at 7am will be leaving at 3pm (pre-pm peak hour on the adjacent street) and their replacements will be arriving at that time or perhaps a little earlier for those who will be part of the 2pm to 3pm overlap. Only a few employees are anticipated to be leaving the facility between 5pm and 6pm (pm peak hour).

Response D-21

Most visitors at other Advanced Health Care facilities visit during weekend days and on the way to work or in the evening Monday through Friday. It is anticipated that the same visitation pattern will occur at proposed project. Sixty-four parking spaces will be sufficient for the number of guests that are anticipated, as required by City code for commercial operations of this size. During the most likely time guests will visit, staffing is unlikely to be greater than 38.

Response D-22

The proposed project includes dedicated surface parking for 64 vehicles (two parking spaces are Americans with Disabilities Act compliant). Per City code, the applicant is required to provide 61 dedicated surface parking spaces for both project employees and guests. No substantial change to the on-street parking is anticipated with the project.

Response D-23

The City's 2030 General Plan MEIR analyzes the potential impact of the development of the general plan land uses on major roadways and did not analyze intersections within proximity to the project site. The proposed project is consistent with the land uses designated for the project site as reflected in the City of Sacramento General Plan.

The proposed signals mentioned in the comment letter are not proposed with this project. These signals were defined in a traffic impact study prepared in November 2000 by DKS Associates (Traffic Study of Potential Development in the SR 160 Corridor- North Sacramento). The project is required to pay a fair share contribution (to be determined by the City) based on trip generation for a future traffic signal installation at the intersection of Canterbury Road/Expo Parkway and Leisure Lane/ Slobe Avenue. The installation of the traffic signals at the several intersections mentioned in the comment letter shall be subject to further studies which may include roadway and ramp improvements which are not part of the proposed project.

Response D-24

The reader is referred to Responses D-19 and D-23, above.

Response D-25

An Environmental Noise Assessment (J.C. Brennan Associates 2014) was prepared and appended to the Draft IS/MND analyzing the proposed project's potential impacts related to noise. Accordingly, a noise abatement wall has been prescribed as Mitigation Measure NOI-01 (see Page 56 of the Draft IS/MND). As outlined in the Draft IS/MND, implementation of Mitigation Measures NOI-01 and NOI-02 will reduce impacts related to noise to a less than significant level. The Environmental Noise Assessment did not find that noise levels emanating from SR 160 would create significant noise levels impacting the proposed use.

Response D-26

The commenter identifies policies from the City's 2030 General Plan as they related to riparian habitat and wetland protection. As previously stated in several responses (above), the project site does not support riparian or wetland habitat types. Potential project impacts related to hydrology and water quality have been analyzed and presented in Section 7 (Page 44) of the Draft IS/MND. The analysis shows that project construction and/or operation would have no impact on groundwater resources. The project site is required to provide a permanent water quality BMP system which is consistent with NPDES permit requirements promulgated by the Regional Water Quality Control Board. This system is being designed consistent with the City of Sacramento, Department of Utilities; design requirements and final plans will be approved by the Department of Utilities ensuring compliance with City standards for water quality.