



THE CORE NATOMAS (P18-011)

MND Comments and Responses

August 21, 2018

The City of Sacramento circulated the Initial Study and Mitigated Negative Declaration (MND) for The Core Natomas project (P18-011) for public comments. The comment period closed August 20, 2018.

Four written comments were received, and are attached to this Memorandum:

- *Lozeau Drury, August 2, 2018:* The comment asserts that the environmental document prepared and circulated for comment is not adequate and does not comply with the California Environmental Quality Act (CEQA). The comment does not identify any specific area or issue as inadequate and a detailed response is therefore not possible. The comment reserves the right to submit additional information at a later date. The City acknowledges the comment, but feels the Initial Study and Mitigated Negative Declaration comply with CEQA requirements.
- *California Water Boards, August 9, 2018:* The Water Boards comment provides information regarding the regulations under the jurisdiction of the agency that may apply to the project. The comment is acknowledged.
- *SMUD, August 15, 2018:* The comment confirms that SMUD maintains facilities in the project area, and that the document should include coverage of issues of importance to SMUD, including energy efficiency, climate change and cumulative impacts. The MND discusses these issues and references the Master EIR certified by the City as well as the policies of the 2035 General Plan. SMUD also indicates that additional infrastructure may be required to

serve the project, depending on the type of loading/infill proposed. No further response is required.

■ *River Oaks Community Association, August 20, 2018:*

Traffic: The letter asserts that the analysis compared the traffic to the prior project and concluded that no new significant effects would occur, and asserts that the MND should have analyzed traffic, including cumulative effects, and identified effects and mitigation. Reliance on the prior traffic evaluation was appropriate. The prior document referenced the Master EIR, which remains relevant, and concluded that the project would not have significant effects. That conclusion remains valid. The baseline for environmental review was existing conditions, and the commenter is correct in that regard—the City used that baseline but used the prior traffic evaluation for analysis purposes.

The comment suggests several actions that could be taken to address traffic conditions, including, for example, establishing areas for future bus stops. While the City may consider such suggestions as part of the project planning process, CEQA does not authorize imposition of such conditions in the absence of a significant effect. The commenter also mentions vehicle miles traveled (VMT) as a metric for impact analysis; while the environmental document here utilized level of service (LOS), the City is engaged in planning for use of VMT as a metric for impact analysis in the future.

Biology: The comment encourages completion of protocol surveys required by the Natomas Basin HCP. Those surveys will be conducted as required.

Air Quality: The comment encourages the City to consider impacts of air quality on new residents, and the City does so consistent with the general plan. The California Supreme Court has held that the CEQA document should focus on project impacts on the environment, and the air quality impacts of the project construction and operation have been covered in the document.

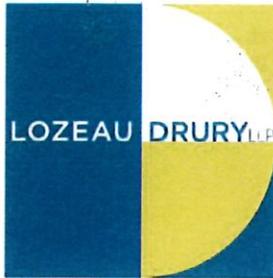
Climate Change: The 2035 General Plan serves as the City's current climate action plan, and has been considered in project planning and review.

The written comments do not require changes in the analysis or conclusions of the mitigated negative declaration. Recirculation of the document is not required. CEQA Guidelines section 15088.5.

COMMUNITY DEVELOPMENT
DEPARTMENT

AUG 6 2018

RECEIVED



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

richard@lozeaudrury.com
richard@lozeaudrury.com

Via Email and U.S. Mail

August 2, 2018

Tom Buford, Principal Planner
Community Development Department
City of Sacramento
300 Richards Boulevard, Third Floor
Sacramento, CA 95881
tbuford@cityofsacramento.org

Ryan Devore, Director of
Community Development Department
City of Sacramento
300 Richards Boulevard, Third Floor
Sacramento, CA 95881
rdevore@cityofsacramento.org

Mindy Cuppy, MMC
City Clerk, City of Sacramento
915 I Street
New City Hall
Sacramento, CA 95814
clerk@cityofsacramento.org

**Re: Comment on The Core Natomas (P18-011)
Initial Study | Mitigated Negative Declaration**

Dear Mr. Buford, Mr. Devore, and Ms. Cuppy:

I am writing on behalf of the Laborers International Union of North America, Local Union 185 and its members living in Sacramento County and/or the City of Sacramento ("LiUNA"), regarding the Initial Study and Mitigated Negative Declaration ("IS/MND") prepared for the Project known as The Core Natomas (City File No. P18-011) for Applicant Sunrise Luxury Living, including all actions related or referring to the proposed development of a 300-unit luxury apartment complex with a club house and various amenities, including a fitness center, business center, tv/fireplace lounge, game room, yoga/pilates studio, pool, spa, and cabana, located at the Northwest Corner of West El Camino Avenue and Orchard Lane ("Project") in the City of Sacramento, in Sacramento County, California. APNs: 225-0220-117.

After reviewing the IS/MND, we conclude the IS/MND fails as an informational document, and that there is a fair argument that the Project may have adverse environmental impacts. Therefore, we request that the City of Sacramento ("City") prepare an environmental impact report ("EIR") for the Project pursuant to the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000, et seq. We reserve the right to supplement these comments during public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

We hereby request that the City of Sacramento ("City") send by electronic mail, if possible or U.S. Mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
 - Notices of any public hearing held pursuant to CEQA.
 - Notices of determination that an Environmental Impact Report ("EIR") is required for a project, prepared pursuant to Public Resources Code Section 21080.4.
 - Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
 - Notices of preparation of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21092.
 - Notices of availability of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
 - Notices of approval and/or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
 - Notices of determination that a project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
 - Notice of any Final EIR prepared pursuant to CEQA.

- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092,** which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

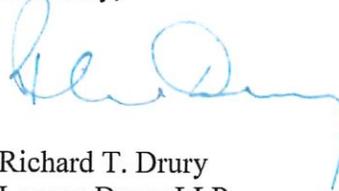
In addition, we request that the City send to us via email, if possible or U.S. Mail a copy of all Planning Commission and City Council meetings and/or hearing agendas.

Please send notice by electronic mail, if possible or U.S. Mail to:

Richard Drury
Theresa Rettinghouse
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
510 836-4200
richard@lozeaudrury.com
theresa@lozeaudrury.com
komal@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Richard T. Drury
Lozeau Drury LLP
Attorneys for LIUNA Local Union No.185



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

COMMUNITY DEVELOPMENT
DEPARTMENT

Central Valley Regional Water Quality Control Board

9 August 2018

AUG 15 2018

RECEIVED

Tom Buford
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

CERTIFIED MAIL
91 7199 9991 7039 6992 6243

**COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE
DECLARATION, THE CORE NATOMAS PROJECT, SCH# 2018072044, SACRAMENTO
COUNTY**

Pursuant to the State Clearinghouse's 19 July 2018 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Core Natomas Project, located in Sacramento County.

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

I. Regulatory Setting

Basin Plan

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

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

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:
http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

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

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

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

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan

(SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

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

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

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

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

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water

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

drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements – Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver)

R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/for_growers/apply_coalition_group/index.shtml or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.



Stephanie Tadlock
Senior Environmental Scientist

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



Sent Via E-Mail

August 15, 2018

Tom Buford
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811
tbuford@cityofsacramento.org

Subject: Notice of Availability of the Mitigated Negative Declaration (MND) for the Core Natomas (P18-011)

Dear Mr. Buford:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Availability of the Mitigated Negative Declaration (MND) for the Core Natomas (P18-011). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the Project MND will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
- <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
- <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery,

SMUD would like to offer the following project specific comments:

- There is an existing overhead 12kV distribution line on Orchard Lane. This line must be maintained to serve additional customers in the surrounding area. The amount of new infrastructure needed to serve customers is dependent on the type of loading/infill that is being proposed. Additional infrastructure will be required to serve this project and other customers in the area.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this MND. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Rob Ferrera, at rob.ferrera@smud.org or 916.732.6676.

Sincerely,



Nicole Goi
Regional & Local Government Affairs
Sacramento Municipal Utility District
6301 S Street, Mail Stop A313
Sacramento, CA 95817
nicole.goi@smud.org

Cc: Rob Ferrera



August 20, 2018

Tom Buford
Principal Planner
City of Sacramento
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95758
tbuford@cityofsacramento.org

Dear Mr. Buford:

RE: The Core Natomas

The River Oaks Community Association (ROCA) would like to thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration for The Core Natomas (P18-011). ROCA is the community association that represents the residents who live in the triangle between the Sacramento River, the I-80 corridor and I-5.

The last time we provided comments on a project proposed at the site at Orchard and West El Camino it was for a proposed car dealership. We are encouraged by the land use change from a business that would bring regional traffic into the neighborhood to a development that can provide an additional sense of place to our corner of Natomas.

The three areas of the Mitigated Negative Declaration that we are commenting on include traffic, biology and air quality, we also provide additional comments on energy.

Traffic: The consultant analyzed the level of service for the project at West El Camino and comes to the conclusion that because the daily trips are lower than the last proposed project, there are no additional significant environmental effects. The baseline is existing conditions, not a proposed use that was never built. Because the use changed to a *residential use* there is an opportunity to lower the traffic impacts to the community by providing a connection to the bus system on Gateway Oaks, or by providing a bus turnout on Orchard Lane north of West El Camino so future bus service can be considered. Other mitigation should also be implemented. Many of the residents will be commuting to work downtown. Due to the significant cumulative traffic impacts at West El Camino mitigation should be provided that lowers vehicle miles traveled, and Level of Service at the intersection.

The modeled vehicle trips are significant when cumulatively added to the Beazer project that will also be using Orchard Lane and can be mitigated by including mitigation that

provides opportunities for public transportation. The project should consider vehicle miles traveled and how to reduce them to less than significant.

Biology: The focus of the IS/MND is on wetlands and the Natomas Basin HCP. We are supportive of mitigation measures 3-1 and 3-2. The protocol level surveys should be conducted at the correct time of year for any of the species that could be present on or adjacent to the site, as appropriate. Swainson's Hawks could be nesting along the canal, and be impacted by construction activities.

Air Quality: Although the project is not likely to have an impact on air quality from construction activities as the mitigation measures to reduce air quality impacts are in place, ROCA consistently comments about the significance of air quality on projects. The layout of the buildings should be such that future residents are not impacted by the poor air quality from I-5. The Air Resources Board has a guidebook out that recommends viable setbacks that projects should maintain near busy corridors such as I-80. The air quality environment is significant to the people who will be living on site. Reducing exposure of residents to poor air quality can reduce the impact of the project being adjacent to the freeway. Additional mitigation such as large trees (oaks, maples, sycamores etc.) should be required between the project and the freeway to buffer some of the additional PMs and other pollutants that may move over any sound wall.

Although energy does not need to be considered (yet) as part of a CEQA analysis ROCA would like to see the City of Sacramento be forward thinking and require solar panels as part of the project to mitigate the increased energy needed to service the project. With large apartment buildings and covered parking areas the opportunities for lowering impacts to the energy grid, and providing shade for residents is a win for both.

We look forward to the response to comments, to seeing the Climate Action Plan – Consistency Review Checklist, and to the next phases of the project. This project can be an example of a project with a low environmental and carbon footprint as well as a luxurious place to live.

Please keep in touch with the proposed schedule for the project and whether there are any additional changes. If you have additional questions or comments please contact Melinda Dorin Bradbury at melindabradbury@sbcglobal.net or 916.212.6589.

Sincerely,

Melinda Dorin Bradbury

Melinda Dorin Bradbury
Land Use Committee Chair,
River Oaks Community Association