

Appendix B

NOP Scoping Comment Letters

Downtown Specific Plan – NOP Comment Letters

<u>Agency/Person</u>	<u>Date</u>
1. Regional San	February 23, 2017
2. Sacramento Area Council of Governments (SACOG)	February 27, 2017
3. William Burg	March 2, 2017
4. Central Valley Regional Water Quality Control Board (CVRWQCB)	March 10, 2017
5. Department of Toxic Substances Control (DTSC)	March 10, 2017
6. Karen Jacques	March 16, 2017
7. Sacramento Municipal Utility District (SMUD)	March 16, 2017
8. California Department of Transportation (Caltrans)	March 16, 2017
9. Sacramento Area Bicycle Advocates (SABA)	March 17, 2017
10. Sacramento County Environmental Management Department (EMD)	March 17, 2017
11. Sacramento Modern (SacMod)	March 17, 2017
12. WALKSacramento	March 23, 2017
13. United Auburn Indian Community of the Auburn Rancheria (UAIC)	March 14, 2017
14. Sacramento Metropolitan Air Quality Management District (SMAQMD)	March 17, 2017
15. Preservation Sacramento	March 14, 2017
16. Comments Received During Community Open House	March 20, 2017



February 23, 2017

Mr. Tom Buford, Senior Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Main Office

10060 Goethe Road
Sacramento, CA 95827-3553
Tel: 916.876.6000
Fax: 916.876.6160

Treatment Plant

8521 Laguna Station Road
Elk Grove, CA 95758-9550
Tel: 916.875.9000
Fax: 916.875.9068

Board of Directors

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www.srcsd.com

Subject: Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the Downtown Specific Plan

Dear Mr. Buford:

Sacramento Regional County Sanitation District (Regional San) has the following comments regarding the Environmental Impact Report for the City of Sacramento's Downtown Specific Plan.

Regional San is not a land-use authority. Projects identified within Regional San planning documents are based on growth projections provided by land-use authorities. Sewer studies will need to be completed to assess the impacts of any project that has the potential to increase flow demands. Onsite and offsite impacts associated with constructing sanitary sewer facilities to provide service to the subject project should be included in this environmental impact report.

Customers receiving service from Regional San are responsible for rates and fees outlined within the latest Regional San ordinances. Fees for connecting to the sewer system are set up to recover the capital investment of sewer and treatment facilities that serves new customers. The Regional San ordinance is located on the Regional San website at: <http://www.regionalsan.com/ordinances-agreements>.

Local sanitary sewer service for the proposed project site will be provided by the City of Sacramento's local sewer collection system. Ultimate conveyance to the Sacramento Regional Wastewater Treatment Plant (SRWTP) for treatment and disposal will be provided via Sump 2/2A and the Regional San City Interceptor system. Cumulative impacts of the proposed project will need to be quantified by the project proponents to ensure wet and dry weather capacity limitations within Sump 2/2A and the City Interceptor system are not exceeded.

On March 13, 2013, Regional San approved the Wastewater Operating Agreement between the Sacramento Regional County Sanitation District and the City of Sacramento. The following flow limitations are outlined in this agreement:

<i>Service Area</i>	<i>Flow Rate (MGD)</i>
<i>Combined Flows from Sump 2 and Sump 2A</i>	<i>60</i>
<i>Combined flows from Sumps 2, 2A, 21, 55, and 119</i>	<i>98</i>
<i>Total to City Interceptor of combined flows from Sumps 2, 2A, 21, 55, 119, and five trunk connections</i>	<i>108.5</i>

Any proposed groundwater remediation work anticipated to occur as part of the specific plan and proposed to be discharged into Regional San facilities will require the necessary discharging permit from Regional San. Permitting will be handled through Regional San's Wastewater Source Control Section (WSCS). The City must abide by the Regional San Ordinance as well as the requirements contained in a wastewater discharge permit.

The SRWTP provides secondary treatment using an activated sludge process. Incoming wastewater flows through mechanical bar screens through a primary sedimentation process. This allows most of the heavy organic solids to settle to the bottom of the tanks. These solids are later delivered to the digesters. Next, oxygen is added to the wastewater to grow naturally occurring microscopic organisms, which consume the organic particles in the wastewater. These organisms eventually settle on the bottom of the secondary clarifiers. Clean water pours off the top of these clarifiers and is chlorinated, removing any pathogens or other harmful organisms that may still exist. Chlorine disinfection occurs while the wastewater travels through a two mile "outfall" pipeline to the Sacramento River, near the town of Freeport, California. Before entering the river, sulfur dioxide is added to neutralize the chlorine. The design of the SRWTP and collection system was balanced to have SRWTP facilities accommodate some of the wet weather flows while minimizing idle SRWTP facilities during dry weather. The SRWTP was designed to accommodate some wet weather flows while the storage basins and interceptors were designed to accommodate the remaining wet weather flows.

A NPDES Discharge Permit was issued to Regional San by the Central Valley Regional Water Quality Control Board (Water Board) in December 2010. In adopting the new Discharge Permit, the Water Board required Regional San to meet significantly more restrictive treatment levels over its current levels. Regional San believed that many of these new conditions go beyond what is reasonable and necessary to protect the environment, and appealed the permit decision to the State Water Resources Control Board (State Board). In December 2012, the State Board issued an Order that effectively upheld the Permit. As a result, Regional San filed litigation in California Superior Court. Regional San and the Water Board agreed to a partial settlement in October 2013 to address several issues and a final settlement on the remaining issues were heard by the Water Board in August 2014. Regional San began the necessary activities, studies and projects to meet the permit conditions. The new treatment facilities to achieve the permit and settlement requirements must be completed by May 2021 for ammonia and nitrate and May 2023 for the pathogen requirements.

Regional San currently owns and operates a 5-mgd Water Reclamation (WRF) that has been producing Title 22 tertiary recycled since 2003. The WRF is located within the SRWTP property in Elk Grove. A portion of the recycled water is used by Regional San at the SRWTP and the rest is wholesaled to the Sacramento County Water Agency (SCWA). SCWA retails the recycled water, primarily for landscape irrigation use, to select customers in the City of Elk Grove. It should be noted that Regional San currently does not have any planned facilities that could provide recycled water to the proposed project or its vicinity. Additionally, Regional San is not a water purveyor and any potential use of recycled water in the project area must be coordinated between the key stakeholders, e.g. land use jurisdictions, water purveyors, users, and the recycled water producers.

If you have any questions regarding these comments, please feel free to contact me at (916) 876-6104 or by email at armstrongro@sacsewer.com.

Sincerely,

Robb Armstrong

Robb Armstrong
Regional San Development Services & Plan Check

cc: SASD Development Services

February 27, 2017

COMMUNITY DEVELOPMENT
DEPARTMENT

MAR - 2 2017

Mr. Tom Buford, Senior Planner
City of Sacramento Community Development Department
300 Richards Blvd., Third Floor
Sacramento, CA 95811

RECEIVED

Re: Notice of Preparation of a Draft Environmental Impact Report for the Downtown Specific Plan

Dear Mr. Buford:

Thank you for inviting SACOG's comments on the Notice of Preparation of a Draft Environmental Impact Report for the Downtown Specific Plan. The Downtown Specific Plan area is part of SACOG's 2016 Metropolitan Transportation Plan/Sustainable Communities Strategy (2016 MTP/SCS) and longer-term Blueprint Vision. The Downtown Specific Plan area is included in the Center and Corridor Community Type in the 2016 MTP/SCS. In this area, the MTP/SCS forecasts 23,007 new housing units and 45,308 new employees; however, it should be noted that the downtown Center and Corridor Community area in the MTP/SCS encompasses the Downtown Specific Plan area but is a larger geography than the Downtown Specific Plan area. Next year SACOG will begin its quadrennial update of the plan (scheduled adoption in 2020) and will be working with the City to determine if there is a need to update the projections for this area for the next MTP/SCS. Additionally, the MTP/SCS includes significant transportation infrastructure investment in this area, including the Downtown/Riverfront Streetcar project. A full listing of the transportation projects can be found in Appendix A of the MTP/SCS.

The MTP/SCS is measured by a number of performance outcomes. Specific to transportation outcomes, the plan increases travel efficiency and multi-modal travel, and reduces congestion and vehicle miles traveled (VMT). Together these outcomes lead to improved air quality. These performance outcomes are a direct result of the relationship between land use pattern and transportation infrastructure and are in part dependent on higher densities and mixed-use development in downtown Sacramento. In the region, downtown Sacramento has the most travel choice and the most potential for higher densities and vertical mixed-use development. As federal standards on criteria air pollutants are getting stricter and there is a strong possibility for our state greenhouse gas reduction targets to get stricter, transit-oriented plans and development in areas like the Downtown Specific Plan area are critical to our region's ability to meet these targets. We recommend you consider this and these

Auburn
Citrus Heights
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Davis
El Dorado County
Elk Grove
Folsom
Gall
Isleton
Live Oak
Lincoln
Loomis
Marysville
Placer County
Placerville
Rancho Cordova
Rocklin
Roseville
Sacramento
Sacramento County
Sutter County
West Sacramento
Wheatland
Winters
Woodland
Yolo County
Yuba City
Yuba County

February 27, 2017

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transportation and air quality performance outcomes as you analyze the proposed plan and alternatives.

If you have additional questions, please feel free to contact me or Kacey Lizon, Planning Manager, at klizon@sacog.org or 916-340-6265.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kirk Trost', with a stylized flourish at the end.

Kirk Trost
Interim Chief Executive Officer

DOWNTOWN SPECIFIC PLAN

ENVIRONMENTAL IMPACT REPORT (EIR) NOTICE OF PREPARATION (NOP)

COMMENT FORM

Please provide the following information if you wish to receive Notice of Availability of the Draft EIR and to document the author of comments received. Thank you.

Name: WILLIAM BURG

Email: b.burg@comcast.net

Address: PO BOX 163688 SACRAMENTO CA 95816

Organization: PRESERVATION SACRAMENTO (REPRESENTATIVE)

I would like to receive future environmental notices via email.

Please provide us with your written comments by **March 17, 2017**. Comments on the NOP may be sent to:

City of Sacramento
Community Development Department
300 Richards Blvd, Third Floor
Sacramento, CA 95811

Attn: Tom Buford, Senior Planner (Email: TBuford@cityofsacramento.org)

You may attach additional pages to this form and/or you may submit your written comments separately. Written comments on the scope of the EIR will be acknowledged in the Draft EIR and will be considered in preparation of the document.

PROJECT
BECAUSE THIS CHANGE TO LAND USE MAY RESULT IN IMPACTS TO
UNIDENTIFIED HISTORIC RESOURCES WITHIN THE APE, THIS EIR
MUST INCLUDE A FULL CENTRAL CITY SURVEY FOR POTENTIALLY
ELIGIBLE HISTORIC DISTRICTS AND RESOURCES.
SOME SURVEYS ARE DECADES OUT OF DATE.
~~POLICY ARE THERE~~ ALLEY INFILL POLICY SHOULD
EXPLORE WHETHER ALLEY "LOT SPLIT" INFILL CONSTITUTES A NEGATIVE
IMPACT TO HISTORIC DISTRICTS - INDIVIDUAL PROJECTS DO NOT EXPLORE
CUMULATIVE IMPACTS OF ALLEY INFILL (SEGMENTING PROJECT.)



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

COMMUNITY DEVELOPMENT
DEPARTMENT

MAR 13 2017

10 March 2017

RECEIVED

CERTIFIED MAIL

91 7199 9991 7035 8421 4770

Tom Buford
City of Sacramento
Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, DOWNTOWN SPECIFIC PLAN PROJECT, SCH# 2017022048, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 15 February 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation of a Draft Environment Impact Report* for the Downtown Specific Plan 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, 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/app_approval/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 the 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
Environmental Scientist

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



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Edmund G. Brown Jr.
Governor

March 10, 2017

Via E-Mail Only

Tom Buford, TBuford@cityofsacramento.org

COMMENTS ON CITY OF SACRAMENTO'S FEBRUARY 15, 2017 NOTICE OF PREPARATION FOR AN ENVIRONMENTAL IMPACT REPORT FOR THE DOWNTOWN SPECIFIC PLAN

Dear Mr. Buford:

Department of Toxic Substances Control (DTSC) has received and reviewed the February 15, 2017 Notice of Preparation (NOP) for the Downtown Specific Plan (DSP) Environmental Impact Report (EIR). The DSP area is generally bounded by the Sacramento River to the west; Business 80 to the east; the American River on the north (excluding the River District and Railyards specific plan areas), and Broadway on the South. The DSP will provide greater detail on the implementation of the Downtown Housing Initiative Plan whose goal is to develop 10,000 housing units in the next ten years. The DSP is planned to be consistent with the Downtown Initiative and the 2035 General Plan.

DTSC appreciates the opportunity to review and comment on the NOP and is eager to participate and provide information to facilitate the implementation of the California Environmental Quality Act process. Close communication between all responsible agencies during preparation of the DSP EIR will be essential to assure the document is complete and up to date. Active DTSC cleanup sites within the DSP area include, but are not limited to, PG&E Sacramento at 2000 Front Street, Sacramento Plating Inc. at 2809 S Street, and The Railyards located at 501 Jibboom Street (with a groundwater plume that extends downtown).

Overall, DTSC concurs with the proposed scope presented in the NOP, and we agree the DSP EIR should be consistent with the 2035 General Plan EIR since the latter discusses the potential impacts, regulations, and policies related to "Hazards and Hazardous Materials." The DSP EIR should also be consistent with the Railyards Specific Plan Update Subsequent EIR since it describes mitigation measures for constructing over contaminated groundwater.

Tom Buford
March 10, 2017
Page 2 of 2

DTSC looks forward to receiving the DSP EIR for a complete review. If you have any questions, please contact me at (916) 255-3601 or Ruth.Cayabyab@dtsc.ca.gov.

Sincerely,



Ruth Cayabyab
Brownfields and Environmental Restoration Program

CC: Brad Shelton, P.G., Brad.Shelton@waterboards.ca.gov
Fernando Amador, P.E., Fernando.Amador@dtsc.ca.gov

Scott Johnson

To: Tom Buford; Greg Sandlund; Jim McDonald; Carson Anderson; Kate Gillespie; Lezley Ewigleben
Subject: RE: Downtown Specific Plan Comments

From: Karen Jacques <threegables@macnexus.org>

Date: March 16, 2017 at 9:52:25 PM PDT

To: tbuford@cityofsacramento.org

Subject: Downtown Specific Plan Comments

March 16, 2017

Tom Buford, Senior Planner
City of Sacramento Community Development Department
300 Richards Blvd., Third Floor, Sacramento, CA, 95811

Re: Downtown Specific Plan NOP Comments

Dear Mr. Bufford,

I am commenting as a long time Central City activist who is actively involved in both preservation , livability and climate change issues. The following are my comments:

Historic and Cultural Resources:

The Central City currently has a number of historic districts and city landmarks. The Central City and Broadway Corridor also contain a number of potential historic districts as well as potential landmarks. Buildings fifty years old or older are eligible for consideration as historic resources and every year more buildings in the Downtown Specific Plan area reach that age and become eligible for consideration. All of these must be accounted for in deciding where to permit new development.

__ In the late 1990's and early 2000's a number of potential new districts were identified and preliminary surveys were done. All of this work came to a halt with the economic crash and needs to be looked at now. The areas surveyed include the following potential districts: New Era (north east portion of the Central City from roughly the eastern boundary of the Boulevards Park District to 29th Street); Expanded Southside Park Historic District (the area south of R Street and west of 16th Street that is not currently part of the Southside Historic District); the area known as the Richmond Grove Neighborhood (south of R Street, west of 19th Street and east of 16th Street); two block or partial block long segments of X Street where original bungalows still stand; the area around the Tower Theater and the south side of the 1700 block of Broadway. There may also be individual buildings within these proposed districts that are eligible for landmark status. When I was on the Preservation Commission, there was also some discussion of potential thematic (as opposed to geographically contiguous) districts including a district made up of late 19th/early 20th Century residential buildings that had had store fronts added to them in the eastern portion of J Street and an Art Deco District.

__ There are now Mid Century Modern buildings in the Downtown Specific Plan area that may also be eligible as a thematic district and/or for individual landmark status .

__The Western portion of R Street is scheduled to have an historic survey and update of the existing historic district. But there are no plans to look at the portion of R Street east of 15th. It is true that most of the historic fabric east of 15th is gone, but there is still an original warehouse complex located at the north east corner of 25th and R and there is another smaller such warehouse on the south side of the 2600 block of R. Both should be looked at.

__The Downtown Specific Plan identifies the various corridors in the Central City as subject to the most intense infill development. This is appropriate, but it should be remembered that some of these corridors (e.g. 19th to 21st) overlap with historic districts and that those historic districts must be recognized and protected.

__Infill development in historic districts also requires a careful look. There has been a trend throughout the Central City to splitting 40 x 160 lots and putting large, three story residential units along the alleys. The typical scenario has been to divide the back 80 feet of such lots into two 80 x 20 lots and then build a 2,000 sq. ft. plus unit on each of the two lots. The Preservation Commission recently voted to deny such a plan at 2218 Capitol Avenue on the grounds that it did not comply with the Secretary of Interior Standards. It is now working on design guidelines for historic districts that would include guidelines for infill. The Preservation Commission is the City commission that has the professional expertise to make such a judgment and its recommendations must be incorporated as part of the guidelines for new infill development in historic districts. Historically 40 x 160 lots had a barn or carriage house at the back of the lot. Auxiliary units as described in the state wide legislation that authorizes such units by right provides a model for alley infill in historic districts that would conform in mass and scale to original uses on these lots and must be considered. Such units could also be a source of affordable housing, whereas 2,000 sq. ft. plus units like those proposed for 2218 Capitol will do nothing to address the housing affordability crisis and likely drive up land prices.

Because the issue of historic resources in the Downtown Specific Plan area is so complex, the most appropriate approach is to conduct an historic survey of the entire area. Such a survey will enable the clear identification of potential historic districts, including thematic districts, and potential landmarks and help to further clarify where new development should and should not go. Sacramento's historic resources are part of what makes the Specific Plan area interesting and beloved. It is imperative that they be preserved. The City needs to both identify potential districts and landmarks and get them through the adoption process.

Sustainability (this includes comments that pertain to the following CEQA Chapters: air quality, climate change, hydrology, noise, walkability/bikeability and well as comments on adaptive reuse)

__Trees: Trees provide a number of environmental services including cleaning dirty air, absorbing CO₂, helping the soils where they are planted to retain water, reducing the extremely loud noise of cars, providing shade that both reduces energy use and makes the streets more walkable and bikeable. The Central City has been losing trees at an ever growing rate and the Broadway Corridor has very few trees. In the Central City, tall lot line to lot line buildings and the cementing over of parkway strips for commercial uses such as outdoor dining/drinking have resulted in the loss of trees and space for trees. In both residential and commercial areas, trees that are removed are often not replaced (even when there is plenty of room for them) and, when replaced, are spaced much further apart than was historically the case. Small (lollipop) and columnar trees are substituted for canopy trees (even when there is room for canopy trees). While other cities are planting more trees, Sacramento is getting rid of ours. Tree retention and

planting needs to be a key part of the mitigation portion of the Downtown Specific Plan. Such mitigation needs to include encouraging building set backs or step backs that allow for large canopy trees; requiring that every effort possible be made to preserve existing trees; removing cement in parkway strips wherever possible to allow for more trees; enlarging existing tree wells so that trees can thrive; and requiring that large, canopy species be planted wherever possible.

__Hydrology: The Downtown Specific Plan area is characterized by more and more cement leaving water little place to drain when we have large rain events as occurred this winter. This problem will worsen as more and more land is covered with buildings. Lot splits and less space between buildings are resulting in fewer landscaped areas where water can drain into the ground.) The lack of places for water to drain is also resulting in more polluted water going into the rivers rather than being absorbed into soil where it can be filtered and cleaned. Mitigations need to include removal of cement from parkway strips wherever possible, limiting size and coverage of alley infill units to allow for more garden space and requiring that streets and sidewalks be paved with permeable material.

__Adaptive re-use is tremendously helpful in the preservation and rehabilitation of historic buildings and needs to be encouraged. The City also needs to encourage the re-use and, in some cases remodel of non-historic buildings that are well constructed and made of sound material. This keeps useable material out of the landfill and preserves embodied energy. In addition, buildings that are adaptively re-used are generally less expensive than new construction for both housing and commercial uses. (The small businesses that make the Specific Plan area interesting generally locate in older buildings because they, like so many residents, can't afford the costs of renting in new construction.) The City needs to explore all possible incentives for adaptive re-use.

Transportation/Traffic

__Grid 3.0 calls for a number of improvements that will hopefully make the Specific Plan area easier and safer to walk and bike. It needs to do more to address the safety of pedestrian crossings where a one way street turns onto another one way street. As someone who walks extensively in the grid, I have observed over and over that drivers come around the corner on such streets at high speeds. The idea of pedestrians never seems to occur to them. There are many one way onto one way intersections that are simply not safe to cross and require bulb outs. The ongoing removal/non-replacement of street trees has made many blocks difficult to walk on our increasingly hot days and needs to be mitigated.

Land Use Planning/Affordable Housing

__Approving projects like Yamanee (100 ft. taller than the General Plan allows) invites land use speculation that drives up development costs and make it more difficult to develop affordable housing. In approving future projects, the City needs to adhere to the General Plan rather than allowing whatever a developer wants based on vague, undefined "community benefits". It would benefit the City to explore allowing some additional height (perhaps one to three additional stories) in cases where developers enter into agreements to provide long term affordable housing in those additional floors. Any "community benefit" allowed should be clearly defined and enforceable.

Thank-you for this opportunity to comment.

Sincerely,

Karen Jacques



Sent Via E-Mail

March 16, 2017

Tom Buford
City of Sacramento
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811
tbuford@cityofsacramento.org

Subject: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Downtown Specific Plan (Clearinghouse No. 2017022048)

Dear Mr. Buford:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Downtown Specific Plan. 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 EIR for the Downtown Specific Plan will acknowledge any Project impacts related to the following:

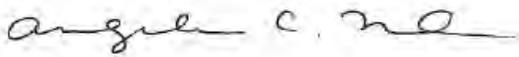
- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - <https://www.smud.org/en/business/customer-service/support-and-services/design-construction-services.htm>
 - <https://www.smud.org/en/do-business-with-smud/real-estate-services/transmission-right-of-way.htm>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

SMUD appreciates the opportunity to participate in the planning efforts that have taken place thus far. The attached letter and exhibit we have previously provided on the Electrical Section of the Downtown Specific Plan's Infrastructure Study captures our recommendations for SMUD's infrastructure as it relates to the Downtown Specific Plan.

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. If you have any questions regarding this letter, please contact Rob Ferrera at rob.ferrera@smud.org or (916)732-6676.

Sincerely,



Angela C. McIntire
Regional & Local Government Affairs
Sacramento Municipal Utility District
6301 S Street, Mail Stop A313
Sacramento, CA 95817
angela.mcintire@smud.org

Cc: Rob Ferrera, SMUD
Beth Tincher, SMUD



DRAFT REPORT FOR THE
**DOWNTOWN SPECIFIC PLAN
INFRASTRUCTURE ANALYSIS**

City Agreement #2016-0752

Lead Agency:

City of Sacramento
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Planning Division
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March~~February~~ 2017



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INTRODUCTION

The 2030 General Plan adopted in March 3, 2009 set forth a new direction for the City of Sacramento. The Plan set forth the Guiding Vision that “Sacramento be the most livable City in America.” Downtown Sacramento would be vibrant with arts, culture, entertainment, and a 24 hour population. The Plan favored developing inward, rather than expanding outward through encouragement of infill development, and reuse of underutilized properties. The 2035 General Plan is a technical review and update of the 2030 General Plan that included the City’s response to climate change.

The Downtown Specific Plan (DSP) is proposed to create a predictable and welcome environment to building and housing in the job and transit center of the Sacramento Region through CEQA and regulatory streamlining combined with market, infrastructure, and historic analysis. The plan area is generally bounded by Broadway, Business 80, the American River, and the Sacramento River. Within this area are found previously developed Specific Plans for the River District, Railyards, and Docks Area.

The Downtown Specific Plan - Infrastructure analysis project area excludes the River District and Railyards Specific Plan area and focuses on the Downtown Grid area south of B Street. Within the limits of the DSP Infrastructure Analysis boundary, the City Planning Division has identified existing entitled projects together with potential underutilized/underdeveloped Opportunity Sites that are currently that will likely be developed over the next 20 years. In total, these sites represent can potentially accommodate 13,400 dwelling units and 3.8 million square feet of employment growth within the Downtown Grid area.

The Central Business District (CBD) as defined by the General Plan (GP) are assumed have a development density of 165 dwelling units per acres (du/ac). The urban corridors (high & low) as defined by the GP are assumed to have a development density of 100 du/acre. The other Opportunity Sites are assumed to have a development density of 30 du/ac. For non-residential uses, each Opportunity Site was assumed to be a mixed-use development with 120 square feet of commercial/retail/office per dwelling unit.

In addition, several commercial/office only sites were identified that are likely to be developed as strictly non-residential sites. These sites are largely envisioned as the growth of State of California offices located in the downtown grid.

Within the DSP Infrastructure area, all of the current active entitlement project were also included. However, the four entitled projects of Aura Condominiums, Cathedral Square, Metropolitan, and The Towers on Capitol Mall were assumed to have a development density of 150 du/ac rather than the number of units they for which they were entitled.

Newly envisioned land uses for these sites will present added infrastructure demands. Existing sanitary sewer, storm drainage, water, electrical power, telecommunications, and natural gas infrastructure capacity must be analyzed and modifications proposed to adequately serve these new demands. Prudent infrastructure planning requires that the effects of potential redevelopment of this Study area to the infrastructure outside the plan area also be considered.

The Downtown Specific Plan - Infrastructure Analysis will assist the City’s Planning Division in attracting development to the downtown area. This analysis is a preliminary engineering, planning level effort that will aid the City and developers in creating a development fee structure to share the costs of improvements, attracting development funding assistance, and provide potential developers with information to evaluate their probable infrastructure costs. This study identifies potential opportunities to provide integrated infrastructure at least cost, through phasing options or the application of sustainable design principles and value engineering design considerations.

The location of each of the Opportunity Sites, Entitlement Sites, and Commercial sites are depicted on the Sacramento Downtown Specific Plan – Land Use exhibit.



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Sacramento Downtown Specific Plan – Land Use



STREET LIGHTS

General Information

The City of Sacramento Public Works Department maintains approximately 40,000 street lights within the City limits. This includes light varieties from the newest street lights installed in North Natomas to the lights in the older parts of the City that were installed over 80 years ago. The majority of lights in the City are High Pressure Sodium (HPS - the orange hued lights). Older lights still have Mercury Vapor lamps (white light) while newer lights may use energy efficient light emitting diodes (LED).

Within the Downtown Grid area of the Downtown Specific Plan (DSP) there are approximately 3,400 street lights that are maintained by the City. There are an additional 250 lights that are owned and maintained by Sacramento Municipal Utility District (SMUD). And, there are 55 lights that are owned and maintained by Regional Transit (RT) along the light rail tracks on K Street between 7th & 12th and along O Street between 7th & 10th. The majority of these lights are the City's post top ornamental style light. There are also mast arm (aka cobra head) style lights. The ornamental style lights are more aesthetically pleasing than the stark style of the mast arm style. However, the luminaires (light bulbs) in the ornamental lights are lower wattage than the mast arm style and therefore requires more lights at a tighter spacing to provide the desired level of lighting. The RT lights are a special dual luminaire and banner pole style. Examples photographs of each type of street light within the Downtown Grid are shown in Appendix A.

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The City is currently replacing the existing HPS cobra-head style luminaires with new energy efficient LED luminaires. The LED lights provide a brighter light than the comparable HPS lights. The LED luminaires are also slightly less expensive than the HPS and last longer. The HPS lights only have a life span of approximately 2 years while the LEDs are estimated to have a life span of up to 25 years. Luminaires are replaced as the burn out. The City does not have the funds to replace all of the luminaires at once. The City is working on a LED replacement luminaire for the ornamental style lights.

The City has dedicated funding from Lighting Landscaping and Maintenance Districts (LLMDs) and the City's General Fund for the maintenance of existing street lights. But, new lights or improvements to the existing lights are typically from grant funds, private funds, public-private partnerships, assessment districts, etc. The City typically has to cobble together money to pay for lighting improvement projects.

The City ~~is~~ has recently completed several street lighting projects within the Downtown Grid area of the DSP including the ESC Project, the Central City Project, the Capitol Mall Project, and several projects for the Handle District. The Riverfront Reconnection Project and the R Street Market Place Phase 2 project are expected to be completed in 2017. The R Street Market Place Phase 3 project is not anticipated to be completed in 2018 due to a delay in the project funding.

The City does not have any other street lighting projects currently planned in the Downtown Grid area, but is working with groups such as The Handle District (a subset of the Mid-Town Business Partnership) to implement and fund other projects. These Districts help provide a source of funding from contributions from their members/owners.

The City has identified needed street lighting in the two large older predominantly residential areas of the Downtown Grid. Also, there is also the 16th Street Improvement project which is currently applying for grant funding, and two other larger areas that the Capitol Area Development Authority (CADA) has identified they are interested in improving the street lighting. None of these potential projects currently has confirmed funding.

Developers of projects in the Downtown are typically required to improve the street lights along the street frontage of their project using ornamental style street lights. However, these lights are only installed on the development side of the street, not across the street, and certainly not on the adjacent blocks.



Table 1 provides the quantities of each type of street lights. The locations of the existing street lights together with the proposed developer installed street lights are depicted on the Sacramento Downtown Specific Plan – Street Lights exhibit. This exhibit also shows the locations of the City’s identified street light improvement areas together with the CADA potential project areas.

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TABLE 1 - STREET LIGHTS

LIGHT TYPE	DOT	SMUD
Mast Arm	1520	0
Dual Mast Arm	4	0
Ornamental	1658	0
Dual Ornamental	4	0
Post Top	5	0
Unknown	210	250
Total	3398	250

Proposed Ornamental 683

TABLE 1 - STREET LIGHTS

LIGHT TYPE	DOT	SMUD	RT
Mast Arm	1,520	0	0
Dual Mast Arm	4	0	0
Ornamental	1,659	0	0
Dual Ornamental	0	0	0
Post Top	5	0	0
Light & Banner Pole	0	0	55
Unknown	210	250	0
Total	3,398	250	55

Proposed Ornamental 662

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Sacramento Downtown Specific Plan – Street Lights



WASTEWATER & STORM DRAINAGE

General Information

The Downtown Specific Plan (DSP) Downtown Grid is located within an area served by both the Combined Sewer System (CSS) and Storm Drainage Basin 52. The CSS is the legacy storm drain and sanitary sewer system that conveys both storm water and sanitary flows. It encompasses approximately 7,500 acres of the Downtown, East Sacramento and Land Park areas. Another 3,700 acres including the River Park, California State University and far-eastern Sacramento areas utilize the system for sanitary sewer only. The City discontinued constructing combined sewer and storm systems in 1946 although connection to the existing CSS was allowed.

The City of Sacramento's storm drainage requirements are handled by numerous drainage basins. Most of these basins are located outside of the CSS area. Storm Drainage Basin 52 is the basin that provides storm drainage collection for the portion of the CSS that includes the westerly portion of the Downtown Infrastructure Study area. Storm drainage within this area is gravity piped to the pumping station (Pump Station 52) located near the Crocker Museum. The pump station discharges directly to the Sacramento River. Sanitary sewer piping from the Basin 52 area is collected with a separated gravity system and connected to the CSS.

Combined Sewer System

The CSS is a collection system of pipes that convey both sanitary sewage and stormwater in a single pipeline. The piping system is greatly oversized for the sanitary sewer component, but inadequate for the City's current storm drainage design standard of 10-year capacity.

The CSS area is currently regulated by the Central Valley Regional Water Quality Control Board (RWQCB) per Cease and Desist Order No. 85-342. The order, including its amendments, requires the City to make operational improvements to reduce combined sewer and runoff overflows and to ultimately provide 10-year capacity for the CSS.

The Combined Sewer System is plagued by combined sewer outflows and overflows where flows to the CSS exceed the system's capacity. Outflows are when surcharges to the CSS that flow onto the streets. Overflows are defined as the rare instances when untreated flows discharge to the Sacramento River. Outflows and the rare overflow usually occur only during heavy storm events.

The City has developed an improvement program to reduce CSO events. These improvements include rehabilitating and expanding Sumps 1/1A and 2, rehabilitating and converting Pioneer Reservoir into a treatment facility, rehabilitating and up-sizing of the sewer mains in the CSS, and rehabilitating the Combined Wastewater Treatment Plant. Many of these projects have been completed.

Currently all flows into the CSS are conveyed westerly to two pumping stations (Sump 2 and 1/1A) located on the Sacramento River. For secondary treatment and disinfection of the flow, the City has entered into an agreement with the Sacramento Regional Wastewater Treatment Plant (SRWTP) to convey 60 million gallons per day (mgd). This treatment capacity is currently sufficient for dry weather flows.

During heavy storms where the capacity is exceeded, the Combined Wastewater Treatment Plant (CWTP) at South Land Park Drive and 35th Avenue is utilized to provide primary treatment of an additional 130 mgd. Excess flows from SRWTP and CWTP are diverted to the Pioneer Reservoir storage and treatment facility that has a capacity of 350 mgd. When all three treatment facilities (SRWTP, CWTP, and Pioneer) have reached capacity, excess flows are directly discharged into the Sacramento River without treatment from Sump 2. When the pipeline system and treatment plant capacities are surpassed, the excess flows flood local streets in the downtown area through maintenance holes and catch basins.



The City prepared a Combined Sewer System Improvement Plan (CSSIP) Update Report dated August 2014. This Report is an ongoing multi-year project intended to evaluate and provide recommendations for projects to alleviate flooding in the CSS area during a 10-year event and to prevent structure flooding during the 100-year event. The Report analysis of the system improvements includes an allowance of increased sewer flows from future development. Recommendations for specific project improvements that provide localized or system-wide reductions to flooding have been identified. The projects are prioritized based on considerations such as flood-reduction benefits, cost-effectiveness, ensuring no increase in untreated discharges, sewer condition/age, cost-sharing opportunities, and City/community interests.

The City of Sacramento has adopted the Combined Sewer Development Fee (City Code 13.08.490) which is an impact mitigation fee that requires mitigation of any significant increase in wastewater flows over the present level. If a proposed development project is determined to have a significant impact on the CSS, an acceptable mitigation plan is required by the City. The current CSS Development Fee is \$130.31 per ESD for up to 25 ESD and \$3,251.72 per ESD for more than 25 ESDs. The payment of the fees mitigates the project's sewer impacts.

In lieu of paying the fees, a developer may mitigate the impacts to the system with a Mitigation Plan approved by the Department of Utilities. The Mitigation Plan could include on-site storage with retention, sewer main up-sizing, diversion of flows, rerouting or replacement of pipes, connection to separated areas, and/or other mitigation measures depending on the site.

There is a second fee associated with the sanitary sewer system, the Facility Impact Fee levied by the Sacramento Regional County Sanitation District (SRCSD). This fee pays for planning, designing, construction and other related costs for wastewater conveyance, treatment and disposal facilities for the system's expansion.

The SRCSD Facility Impact Fee currently is calculated by multiplying the ESDs generated by the development by the fee of \$3,358 per ESD for infill projects. It is possible in certain cases to receive a credit of 1 ESD per parcel as credit for previously paid fees. The County's policy determines when the credit is allowed. The County has published the method of calculating the ESDs for the different types of development. Additional information is available on line at <http://www.srcsd.com>.

Storm Drain – Basin 52

Basin 52 serves the storm drainage needs of approximately 320 acres, bounded generally by the tracks north of I Street, Sacramento River, S Street, and 7th & 10th Streets. There are two additional smaller storm drainage basins, Basins 73 & 114 that are pumped into the Basin 52 system and are generally considered part of the larger Basin 52 system for planning purposes.

Basin 114 serves the area bounded by 3rd to 5th Streets and I to J Street. The sump for Basin 114 is located near at the intersection of 4th and J Streets. Basin 73 serves the depressed section of 5th Street from J Street to L Street. The sump for Basin 73 is located just west of 5th Street in Downtown Plaza. These combined basins discharge stormwater through the levee into the Sacramento River at Sump 52, located at the Crocker Museum site at 3rd and P Streets. The limits of each of these Basins (52, 73 & 114) together with the CSS are shown on Figure IV-1.

Basin 52 utilizes a system of pipelines conveying stormwater to Sump 52. The system is currently over capacity, and allows fairly significant street flooding even during the 2-year storm event. This flooding is comprised only of stormwater, not sanitary sewage. Property flooding for at-grade structures is only anticipated during the 100-year storm event, although underground structures are at risk during smaller storm events.

The Basin 52 Stormwater Master Plan dated May 1996 has determined the recommended improvements for the shed area. The improvements include construction of a new pump station and storage basin, new outfall lines to the river, upsizing 8,800 feet of pipe and replacement in kind of 3,300 feet of pipe, as the life cycle



requires. The City Department of Utilities is currently preparing an update of the Basin 52 Stormwater Master Plan with their consultant AECOM. A draft of the initial report was made available for review for this DSP report. The findings in the updated Basin 52 Stormwater Master Plan are preliminary and are therefore subject to change as the Master Plan report is finalized over the coming months.

Existing Conditions

Combined Sewer System

The Combined Sewer System (CSS) that serves both the sanitary sewage and stormwater needs of the area consists of pipes ranging in size from 4 inches to 120 inches in diameter. The largest pipe in the CSS is the 120-inch Pioneer Interceptor (force main) which conveys flows from Sump 2 to Pioneer Reservoir. Piping material includes brick, PVC, RCP and VCP. Flows for the system are through the DSP Downtown Grid area are generally from the north to the south.

The local drainage and sanitary sewage is typically collected in 8-inch to 12-inch piping systems located in the alleyways and streets. The collection system has collector pipelines ranging in size from 24 to 36-inch diameter.

The City has recently completed the majority of the Downtown Combined Sewers Upsizing project. This project added significant capacity to the CSS with the installation of large diameter pipelines ranging in size from 36-inch to 84-inch on U, P S, 5th & 7th Streets.

Storm Drain - Basin 52

The Basin 52 piping system ranges from 12 inches to 54 inches in diameter. The larger collection mains are located in 3rd Street, 4th Street, and 7th Streets. The system generally flows southwesterly towards the Basin 52 Pump Station located adjacent to the Crocker Museum at the corner of 3rd and P Streets.

Proposed Improvements

Combined Sewer System

The DSP Downtown Grid is considered essentially developed at this time with a variety of land uses including office, commercial, and residential. The majority of the Opportunity Sites and Entitled Sites are envisioned as redevelopment projects consisting of mixed-use land uses that incorporate a combination of residential, office, and commercial/retail uses. Sanitary sewer flows are expected to increase because of the future increased density of office, commercial and residential land uses. Since the majority of the sites are previously developed with highly impervious surfaces (i.e. roof tops, parking lots, sidewalks, etc.), the stormwater runoff flows from the projects are not anticipated to increase with the development. The increased sanitary sewer flows are anticipated to be relatively small compared to the stormwater component of the CSS design flows.

Sanitary Sewer: The anticipated development of the DSP Downtown Grid area is expected to increase the sanitary sewer flows due to the increase in the residential, office, and commercial uses. The addition of over 13,400 new residences, almost 3.8 million square feet of office/commercial/retail uses will impact the existing sewer system.

The City of Sacramento Design Standards for sewer generation rates (Section 9 – Sanitary Sewer Design Standards) contain average daily flow rates for residential and non-residential uses. The existing standard for sewer generation is 400 gallons per day (gpd) per Equivalent Single Family Dwelling Unit (ESD). The City DOU is currently in the process of revising these Design Standards. The new standards are anticipated to be adopted by Fall 2017.

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For more recent planning studies, the City has used a lower generation rate of 310 gpd per ESD. This is based on the stricter water usage construction standards limiting the flow per fixture unit that have been adopted over the last decade. With the State's adoption of CalGreen construction standards, even further reductions will be realized. However, this lower generation rate has not been formally adopted as the City's standard, and is therefore subject to change.

A factor of 0.55 ESD per residential unit was selected based on the nature of the high density urban infill residential. The factor is consistent with other recent planning studies for the Railyards and Richards Boulevard Specific Plans. This factor when multiplied by 310 gpd per ESD yields a sewer generation rate of 170 gpd per residential unit. This factor has not been formally adopted as the City's standard, and is therefore subject to change.

For the non-residential land uses, the City's standards recommend 0.2 ESDs per 1,000 square feet for general office/commercial buildings. This generation rate has been applied to both the Office and Commercial/Retail land uses, and yields a rate of 62 gpd per 1,000 square feet.

Given the anticipated development of 13,400 dwellings units in the DSP Downtown Grid area, the anticipated increase in the residential Average Dry Weather Flow (ADWF) is 2.28 mgd (= 13,400 DUs x 0.55 ESDs x 310 gpd/ESD). The anticipated development of 3.8 million square feet of commercial/office/retail space is anticipated to increase the ADWF by 0.24 mgd (= 3.8M s.f. x 0.2 ESD/1000 s.f. x 310 gpd/ESD). The total anticipated increase in the ADWF is 2.52 mgd.

The City requires the developer to mitigate the increased sewer flows. The City will consider one of the following approaches to mitigate the impacts:

1. [Project Developer p](#)Pay the established CSS mitigation fee.
2. At the City's discretion, the Project [Developer](#) can participate in a City sponsored Project that improves the system in the area, and can be upsized to incorporate mitigation of the project. A separate cost sharing agreement shall be executed for this option.

The stormwater runoff characteristics of the current and proposed land uses are similar. As a result, the peak stormwater flow rate and volume of rainfall-runoff is not expected to significantly change when the land use changes. The City requires the developer to mitigate the increased drainage flows. The City will consider one of the following approaches to mitigate the impacts:

1. [Project Developer p](#)Pay the proposed CSS drainage impact fee. This fee was calculated by to be \$6.89 per square foot of increased imperviousness in 2015.
2. [Project Developer d](#)irectly mitigate the impacts utilizing low impact development Best Management Practices (BMPS).
3. [Project Developer d](#)irectly mitigate the impacts via an on-site or off-site improvement as determined by a Drainage Design Report.
4. [For p](#)Projects disturbing less than 2 acres, [the Project Developer prepare by preparing](#) a Drainage Design Report, and providing a minimum of 7,600 cubic-feet of on-site storage per acre of increased impervious area. The maximum discharge flow rate from the on-site storage shall be limited to 0.18 cubic feet per second (cfs) per acre.
5. At the City's discretion, the Project [Developer](#) can share in a City sponsored Project that improves the system in the area, and can be upsized to incorporate mitigation of the project. A separate cost sharing agreement shall be executed for this option.

Recommended System Improvements: The updated CSSIP has recommend eleven projects located within the DSP Downtown Grid area. The following is a list of these projects:

1. WA1-1 Zapata Park



2. WA1-2 G & 9th Street Parking Lot
3. WA1-3 9th Street from G to L Street
4. WA1-4 14th Street Storage
5. WA1-5 N & 22nd Street
6. WA1-6 24th Street Storage
7. WA1-7 Grant Park Storage
8. WA5-1 T & 20th Street Pipe Installation
9. WA5-2 28th & T/U Alley
10. WA5-3 W & 25th Street Storage
11. WA3-7 Target Parking Storage

A twelfth project, the WA6-2 Riverside Boulevard Upsizing is partially located within the DSP Downtown Grid boundary with the upper reaches of the pipe system improvements located on Broadway and Riverside.

In addition to these CSSIP projects, improvements specific to the locations of the Opportunity Sites, Entitled Sites, and Commercial Sites have been conceptually identified. No detailed design analysis was performed. The existing system is generally comprised of 6-inch to 10-inch pipelines in the alleys and streets. These pipelines while more than adequately sized for the sanitary sewer flows, are typically undersized for the added storm drainage flows during a rainfall event. The proposed system would upsize the existing pipe or add a separate 18-inch storm drain pipeline to the system. Adding an 18-inch pipeline to an existing alley or street may prove difficult, and will need to be analyzed on a project by project basis.

Storm Drain - Basin 52

The construction of the improvements identified in the Basin 52 Master Plan is not required to be constructed by the Downtown Specific Plan developers by current City policy. However, the system improvements have been included in this Report and included in the cost estimate.

The costs for these improvements are currently not included in the City's Capital Improvement Program, and a funding source has not yet been identified. If a financial plan to fund the improvements is developed in the future, developers in the Downtown Specific Plan area within the limits of the Basin 52 watershed would be expected to pay their proportionate share.

3rd Street CSS Relief Sewer Project

The upsizing of the existing 3rd Street CSS sanitary sewer system was studied by NV5 (formerly Nolte) for the City Utility Department in 2007. An update of this report was prepared by NV5 in 2015. This pipeline conveys primarily sanitary sewer flows with some existing storm drainage flows entering the system at the Railyards project. With the development of the Railyards, it is intended that the majority of the stormwater flows will be conveyed directly to the Sacramento River with the construction of a new stormwater collections system and pump station. The increased sewer flows from the Railyards development together diverted sewer flows from the River District Specific Plan area and development along 3rd Street will require the existing 3rd Street CSS pipeline to be upsized.

The 3rd CSS project is currently under design with construction anticipated to occur in 2018. The construction of the improvements identified in the 3rd Street CSS Relief Sewer Project is not required to be constructed by the DSP Downtown Grid developers by current City policy. However, the 3rd Street CSS Relief Sewer system is included in the cost estimate.



The proposed CSSIP, 3rd Street CSS, Basin 52, together with the locations of the 18-inch CSS pipelines are depicted on the Sacramento Downtown Specific Plan – Wastewater & Storm Drainage exhibit.

Stormwater Quality

The City of Sacramento adopted the Stormwater Quality Design Manual (SQDM) for the Sacramento and South Placer Regions (May 2007), a joint effort of the communities in the greater Sacramento region. The SQDM provides locally-adapted information for design and selection of three categories of stormwater quality control measures: source control, runoff reduction and treatment control. Per the requirements, multi-family and commercial, projects greater than 1 acre are required to implement permanent post-construction treatment measures.

The DSP Downtown Grid area is subject to the requirements of the SQDM only for those projects that fall within the boundary of Basin 52. All projects greater than 1 acre will be required to comply with the stormwater quality measures outlined in the SQDM. These measures may include treatments measures such as bioswale planters, stormwater treatment vaults, green roofs, etc. either used as a single treatment or as a combination of several measures. Developers are urged to discuss their project with the Stormwater Quality Section of the City's Utility Department while in the planning stages so that proper permanent post construction stormwater quality treatment measures can be effectively implemented into the project.

The remainder of the Study area is within the Combined Sewer System (CSS) which is under separate permit regulations for stormwater discharges. The stormwater flows from the CSS are treated at the SRWTP, CWTP, and the Pioneer treatment facilities. Therefore, projects within the CSS are not required to have additional stormwater quality control measures.



Sacramento Downtown Specific Plan – Wastewater & Storm Drainage

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WATER SUPPLY

General Information

The City of Sacramento provides domestic water to the Downtown Specific Plan area. The City utilizes both surface water and groundwater to meet the water demands. The City treats surface water diverted from the Sacramento and American Rivers through the Sacramento River Water Treatment Plant (SRWTP) and the E.A. Fairbairn Water Treatment Plant (FWTP), respectively. Additionally, the City extracts groundwater from both the North Sacramento and Central Sacramento basins. The current reliable water production capacity is approximately 280 mgd.

Sacramento River Water Treatment Plant: The SRWTP began operation in 1924 with an initial capacity of 32 million gallons per day (mgd), and treats water diverted from the Sacramento River approximately one-half mile downstream of the confluence of the American River. A new water intake structure, located approximately 700 feet downstream of the old intake structure, was completed in 2003. Other expansions and modifications completed by the City since the 1920s have increased the treatment plant's design capacity to 160 mgd. Currently, due to the conditions of the existing facilities and hydraulic constraints, the SRWTP's reliable capacity is limited to 135 mgd. A project is currently being completed to rehabilitate the older facilities at the SRWTP to bring the capacity back to 160 mgd.

E.A. Fairbairn Water Treatment Plant: The FWTP is located adjacent the American River approximately seven miles upstream with the Sacramento River. The FWTP began operation in 1964 and has a current capacity of 200 mgd following an expansion completed in 2005. Currently, the California Department of Public Health (CDPH) has permitted a capacity of 160 mgd. However, the amount of water diverted is further limited by the so-called Hodge Flow Criteria. Generally, during the time of peak demand, most often in June, July, or August, the Hodge Flow Criteria could limit the diversion rate at the FWTP to 100 mgd.

Groundwater Wells: The City currently operates 22 municipal groundwater supply wells; 20 wells are located in the northern portion of the City, north of the American River, while the remaining 2 are located south of the American River. The total pumping capacity of the City's municipal supply wells is approximately 20.6 mgd, assuming 90 percent of the production capacity is available. The City is conducting a well rehabilitation program projects for improving capacity at several existing wells. The City has also constructed one newer well in the southern portion of the system at Shasta Park with a second well pending at the FWTP. These two projects are anticipated to supply potable water by 2017-2018. The City anticipates the groundwater pumping capacity to increase to approximately 25 mgd after the rehabilitation project and new wells are completed.

The City maintains twelve enclosed distributed water storage reservoirs together with a total capacity of 48 million gallons. This water is used to meet the water demand for fire flows, emergencies, and peak hours where they exceed the maximum day supply rates. A new 4 million gallon distribution storage tank in the southern portion of the City is anticipated to be completed in 2017, which will increase the total storage to 52 million gallons. In addition to the reservoirs, the SRWTP & FWTP together maintain a combined on-site storage of over 45 million gallons.

The City operates pumping facilities throughout the area. There are 18 high lift service pumps at the SRWTP and FWTP. The City also maintains pumping facilities at ten of the City's storage reservoirs. These pump stations are of varying sizes and capacities.

The City differentiates the water mains into two distinct categories: water distribution mains and water transmission mains. Water distribution mains are smaller pipelines located in the streets and alleys utilized for water services. Water transmission mains are larger pipelines utilized to convey water to the distribution mains.



It is the City's policy to utilize the water distribution mains only for water services, fire services and fire hydrants. These pipes are typically 4 inches to 12 inches in diameter. If no smaller pipe is available, existing water mains 14 inches and 16 inches in diameter may be considered distribution mains. These pipes may be tapped only with the approval of the City of Sacramento Department of Utilities.

Transmission mains are 18 inches and larger in diameter. They are used to convey large volumes of water from the treatment plants to selected points throughout the distribution system. They are also utilized to transfer water to and from the storage reservoirs to meet fluctuating daily and seasonal demands. These mains cannot be tapped for water services, fire services or fire hydrants. Considering each service tap is a potential weakening of the water main, the City currently has the policy to restrict the installation of service taps until after a project has been reviewed and approved by the City. This is to restrict the number of taps to the mains to those that are in the ultimate location per an approved development plan. This reduces the number of service taps that are abandoned due to changes in the development plans.

The City Department of Utilities has an active Capital Improvement Program (CIP) for maintaining and upgrading the water supply system. The implementation of the water improvements to necessary to serve a specific project site is typically the responsibility of future developers. The City's policy is to require the developer to construct any infrastructure necessary to support the project in question. To determine if water needs for a project can be met a water supply test is performed on the existing system. If the existing water system is sufficient to meet the needs, no infrastructure upgrades are necessary. If the existing infrastructure is found to be insufficient for the project's needs, the developer is required to construct necessary infrastructure improvements.

The current City policy could prove burdensome to a small developer whose project exceeds the capacity of the water system. One project could, under this approach, be held responsible for major infrastructure improvements, creating the possibility of a financial responsibility making the project no longer viable. One possible mitigation for this problem could include the developer entering into agreements with adjacent developers to construct the required facilities as a small assessment district. This process, however, would be complex, expensive, and could be infeasible due to intractable owners.

The infrastructure improvements required for all new development will need to meet current City standards. Looped water main systems are typically required due to the unreliability of dead end mains, and the potential for water quality problems as a result of stagnant water. Additional water main installation may also be required depending on the existing system layout. The City's meter program will require all new water services to be metered.

Temporary source of water for construction is easily acquired two different ways. First, the contractor can purchase a construction service. This utilizes the ultimate water service tap. Secondly, the contractor can purchase rights to use water from an adjacent fire hydrant.

For additional information, the document titled "Department of Utilities Water Distribution System – Commonly Used Criteria", which summarizes the City's planning and design criteria is located in the Appendix C.

Existing Conditions

The Downtown Infrastructure Study project area is generally served by several major transmission mains ranging in size from 14-inch to 42-inch in diameter together with an extensive system of service mains ranging in size from 6-inch to 12-inch diameter.

A major transmission main serving the greater Downtown Sacramento area from the SRWTP enters the area at the west end of I Street through a 42-inch diameter pipeline from the Railyards area. This 42-inch pipeline continues easterly through the DSP area along I Street and H Street decreasing in size to a 36-inch and then to a 30-inch as it branches north and south to serve the greater Downtown Grid area. The 30-inch leaves the DSP area at H Street & 29th Street. The 24-inch transmission mains leave the DSP Downtown Grid area at



three locations including on Broadway at Muir Street, Broadway on the easterly side of the railroad tracks between 19th & 20th Streets, and Q Street at 29th Street.

There are no wells or reservoirs within the limits of the DSP Downtown Grid area. The nearest reservoir outside of the SRWTP is the Alhambra Reservoir located just to the east of the DSP Study area Alhambra Boulevard on the block bounded by Alhambra Boulevard, J Street, 33rd Street, & L Street. This reservoir together with the SRWTP are identified by the City as a Critical Infrastructure items.

The existing DSP Downtown Grid area is generally well served by an extensive system of service mains ranging in size from 6-inch to 12-inch diameters. Upsizing of the existing mains has been performed over the years as development of the Downtown Study area has occurred. However, some of the system mains are cast iron pipelines which have demonstrated a history of problems associated with mains reaching the end of their useful life. Hydraulic testing of these mains has determined a severe reduction in capacity. Continued replacement/upsizing of the cast iron mains, and the smaller 6-inch and 8-inch mains is envisioned in order to provide adequate domestic and fire suppression needs.

Proposed Conditions

Water Demands: The types of development envisioned with the Opportunity Sites and the Entitled Projects are high density urban infill type projects. As described in the Land Use section of this report, the Central Business District (CBD) as defined by the General Plan (GP) are assumed have a development density of 165 dwelling units per acres (du/ac). The urban corridors (high & low) as defined by the GP are assumed to have a development density of 100 du/acre. The other Opportunity Sites are assumed to have a development density of 30 du/ac. For non-residential uses, each Opportunity Site was assumed to be a mixed-use development with 120 square feet of commercial/retail/office per dwelling unit.

Projects within the Downtown Core area are anticipated to have a density of Housing units [that are in these projects](#) typically ~~are~~ smaller units (700-1000 square feet) with a smaller per capita occupancy rate per unit than [traditional](#) single-family or multi-family units in suburban areas. The domestic water demands for these high density residential units is anticipated to be significantly reduced from the City's typical single family or multi-family water usage criteria. Fire flow demands for these three areas are assumed to be 3,500 gpm for the CBD, 2,500 gpm for the urban corridors, and 1,500 gpm for the remaining areas.

The City's water demand criteria for an Equivalent Single Family Dwelling (ESD) unit is 400 gallons per day (gpd) per unit. A reduced water demand rate of 310 gpd has been used in recent planning efforts, and should be used for projects in the DSP area. The City's criteria allows a reduction for multi-family units by applying a factor of 0.75 ESD. For the type of high-density residential urban infill development with smaller unit sizes and fewer people per unit, a factor of 0.55 ESD per unit should be used for the proposed project domestic water demands within the Study Area. This yields a generation rate of 170 gpd per unit. This is similar to the factors used for the Railyards and River District Specific Plan areas.

For the non-residential land uses, the City's standards recommend 0.2 ESDs per 1,000 square feet for office/commercial buildings for general planning purposes. This generation rate is generally applied to both the Office and Commercial/Retail land uses, and yields a rate of 62 gpd per 1,000 square feet. Factors for specific land uses such as restaurants, bars, dry cleaners, etc. with anticipated higher usage vary from 0.2 to 2.0 ESD per 1000 square feet.

The adoption by the State of California of SB7 – "20x2020" Water Conservation Standards requiring a 20% reduction in urban water usage by the year 2020 and the CalGreen Building Code will require reductions in overall water usage through stricter indoor and outdoor usage. These requirements mandating water conservation will further justify the use of the reduced water rates for the Study Area development.

Given the anticipated development of 13,400 dwellings units in the DSP Downtown Grid area, the anticipated increase in the residential average daily water demand is 2.28 mgd (= 13,400 DUs x 0.55 ESDs x 310 gpd/ESD). The anticipated development of 3.8 million square feet of commercial/office/retail space is



anticipated to increase the average daily water demand by 0.24 mgd ($= 3.8\text{M s.f.} \times 0.2 \text{ ESD}/1000 \text{ s.f.} \times 310 \text{ gpd/ESD}$). The total anticipated increase in the average daily water demand is 2.52 mgd.

Infrastructure: The plan for the DSP Downtown Grid area is to upgrade the existing water system supply grid to provide the Opportunity Sites, Entitles Sites, and Commercial Sites with adequate water for both domestic and fire suppression needs. The existing water system is generally adequate, but will require strategic upgrades to serve the proposed projects.

The existing transmission mains are not anticipated to be a requirement for development within the limits of the DSP Downtown Grid area. However, the City has identified several sections of older mains that will likely need to be replaced due to age within the next 30 years. These mains will be the responsibility of the City through their ongoing Capital Improvement Program (CIP).

Extensions of the existing service main system is envisioned to provide adequate service to the developments within the Study Area. The proposed extensions of the existing service main system will be accomplished using a combination of new 8 and 12-inch water mains. The City's Fire Department requires hydrants on each side of the Street fronting development projects. This requirement adds several new sections of water mains to the system. The existing system of 8, 10, & 12-inch service mains will be retained provided they adequately serve future development with sufficient hydraulic capacity.

The existing 6-inch and 8-inch mains located within the alleys can be retained to provide fire and domestic water service to the adjacent existing buildings. The alleyway mains will be retained as installation and maintenance of new services are more easily performed from the alleys. If alley improvements/activation projects occur, it is recommended older pipelines be replaced concurrent with other surface improvements.

The Department of Utilities is also anticipating the need to add water transmission mains through the DSP Downtown Grid area. These are large diameter transmission mains ranging in size between 48 to 78 inch diameters. The size and locations for these transmission mains at this time are very conceptual and no detailed alignment/routing studies have been performed. These mains are needed to move water through the DSP area to other parts of the City's service area to service the future water needs. They are included in this report for informational purposes only.

The proposed water system improvements together with the CIP projects and future water transmission mains are depicted on the Sacramento Downtown Specific Plan – Water Mains exhibit.



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Sacramento Downtown Specific Plan – Water Mains



NATURAL GAS

General Information

The Pacific Gas & Electric Company (PG&E) supplies natural gas to the Sacramento area. During the winter, approximately 70 percent is imported from Canada and the balance is supplied from California production wells. During the summer, this ratio is reversed. Also during the summer, gas prices are lower so gas is stored in underground reservoirs for use during winter peak use periods.

In the Downtown Specific Plan (DSP) area there are both high pressure and low pressure distribution systems. High pressure system pipelines, generally 4-inch diameter and larger, carry gas at approximately 40 pounds per square inch (psi). Low pressure system pipelines, generally 2-inch diameter, carry gas at a pressure of seven inch water column (about 0.25 psi). Service is generally provided from the low pressure system unless usage exceeds about 3000 cubic feet per hour; however, in this area the system is all high pressure. Regulators are used to reduce high pressure to low pressure.

Existing Conditions

The high pressure gas system in the DSP area generally is served by a grid system throughout the Study area. The high pressure system pipelines range in size from 4-inch to 12-inch diameter. The low pressure system is predominantly comprised of 1-inch and 2-inch diameter pipelines in some cases parallel to the high pressure mains.

Proposed Improvements

PG&E was unable to provide a draft of necessary system improvements and/or review of their gas system without specific information regarding gas loads at each potential development site together with an application for service.

PG&E stated they are currently making improvements to their system in accordance with a number of projects and initiatives which may negate the need for future improvements when or if the new developments are constructed. PG&E will service the new developments and infrastructure as they are constructed and require service. Upgrades to the existing system will be addressed on a case-by-case basis as additional information is received on the actual development square footage and maximum & minimum gas loads.

If the user is a core (non-interruptible) customer in the service area and will accept service at 7 inch water column pressure, the company is generally obligated by Public Utilities Commission regulations to provide service without additional cost for service. If the user is a non-core (interruptible) user, or needs an elevated pressure service for large volume use, there are charges for service according to the company's new business tariffs.



ELECTRICAL

General Information

(Section currently being reviewed and edited by SMUD)

The Sacramento Municipal Utility District (SMUD) provides electrical service to customers located within the Downtown ~~Grid area of the Downtown Specific Plan (DSP) Specific Plan (DSP) area~~. Power is transmitted to the DSP area by a ~~looped series~~ of underground 115 kilovolt (kV) transmission ~~system lines~~ that feed ~~several substations that step down the voltage to underground~~ 12 kV ~~distribution and underground/overhead and~~ 21 kV ~~distribution~~ systems. ~~An underground~~ The 115 kV loop connects SMUD Station A located at 6th and H Streets, Station B located at 19th and O Streets, and Station D located at 8th and R Streets. This loop is also connected to the North City (north of 20th & C Streets) and Mid City (35th & R Streets) substations.

Station D, Mid City and the North City substations ~~steps down~~ drop the 115 kV to 21 kV and Station A and Station B ~~steps down~~ transform 115 kV to 12 kV to serve the overall downtown area. The 12 kV system ~~serves a secondary network system. is a high reliability network with redundant feeds, intended to serve the high rise core area where considerations such as keeping elevators and newspaper presses operating are important.~~ The 21 kV system serves the balance of the downtown area and will likely be used to serve new development within the greater ~~Downtown~~ Grid area ~~and outside of the downtown core~~.

Existing Conditions (Facilities)

As stated above, the 115 kV transmission system is connected to Station A located on the north side of H Street between 6th and 7th Streets ~~within the Downtown Grid just outside the Study~~ area. The transmission lines are located in H Street from the Substation to 5th Street and then in 5th Street south through the Study area.

The southerly portion of downtown Sacramento is served by the 21 kV distribution system. This system is fed by Station D and by Mid City. Station D has two 40 ~~Megawatt~~ Megawatt Volt Amperes (MVA) transformer banks. Mid City has two 37.5 MVA and two ~~254~~ 25 MVA banks. ~~The 21 MVA banks could be changed out to 37.5 MVA banks if it became necessary to serve the demands of the area.~~

The 12 kV network has limited capacity for expansion. It is served by Station A which has six banks (ranging ~~from 20-25~~ MVA) and Station B which contains three 37.5 MVA transformer banks and have no further room for additional transformer banks. The 115 kV circuits utilize pressurized oil-filled cables with pumps that circulate oil through the cables. Repairs or relocations are difficult and expensive, and require importing technicians from out of state where this older technology is more common. Connections are expensive for customers, requiring large underground vaults and redundant transformers and feeds, with fire suppression and dewatering facilities.

Regulatory Context

The energy consumption of new buildings in California is regulated by State Building Energy Efficiency Standards, Title 24. These are contained in the California Code of Regulations, Title 24, Part 2, Chapter 2-53. Enforcement of the regulations is addressed in the California Code of Regulations, Title 20, Chapter 2, Subchapter 4, Article 1. Title 24 applies to all new construction of both residential and non-residential buildings, and regulates energy consumed for heating, cooling, ventilation, water heating, and lighting.

Proposed Improvements

Based on land use projections given in this DSP ~~Downtown~~ Infrastructure ~~Analysis~~ Study, SMUD estimates that the additional electrical load from development ~~within the Downtown Grid area~~ may be ~~70XX~~ to ~~90XX~~ megawatts, ~~and is not likely to exceed XX megawatts. A majority of the~~ This load ~~would require~~ can be fed by ~~the existing transmission and distribution system without~~ adding major components in the Downtown Grid

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areaInfrastructure Study Area. SMUD is already working on replacing North City substation with Station E a 60MVA facility (vs. NCY). This allows for additional express feeders mainly to serve the Railyard development, but also to offload and back up Downtown feeders to serve development (initiated by new G1C arena) within the DSP area. An existing NCY feeder is being extended to Downtown in 2017 and the first express feeder is planned by 2019 when Station E is completed.

Once Station A(network) is replaced with Station G, and the Station A site is decommissioned, Station A is being planned to add 80 MVA. With the addition of 13,400 units and 3.8 million square feet of commercial development, another three 40 MVA substation would be required in along the 7th Street corridor in the Railyards or River District, preferably between North B Street and Richards Boulevard. However, this could be located anywhere between 7th Street & 10th Street, North B Street and Richards. The substation is more costly to construct west of 7th Street and less expensive further east since overhead facilities will need to be extended from Station E.

There will be cases where multiple adjacent Opportunity Sites are on a common 21 kV feeder, necessitating switch(es), risers, line reconductor, or line extension to the parcel(s). However, aAdditional major equipment and infrastructure external to the Downtown Grid areaStudy Area will be required as electrical demand approaches area electrical capacity. This would require additional duct banks and splice vaults along 5th and 6th Streets. There is also a possibility of extending a feeder tie on 7th or 12th Streets from the north but this may be external to the Study Area. These improvements will be identified in SMUD's five year system plan as the need arises. Depending on phasing of the Opportunity Sites, some smaller sites may be fed off the Network system. Extension of the existing 21 kV distribution system will be required to serve the Proposed Projects and Opportunity Sites.

In the near term, SMUD anticipates extending the existing 21kV system from the intersection of 76th & L Streets east on L to 7th, north on 7th to the K/L Alleyway, then east in the Alleyway to 9th-10th Street. This extension of the system is proposed for construction in 2017-2019. It is anticipated that an extension of the 21 kV line will be required along 3rd Street from I Street to N Street and connecting with a location west of 2nd Street (just west of the Crocker Museum). The section on 3rd Street from J to I Street or on J Street across from 3rd and to 5th Street will be required to loop the system. The future extensions of the 21kV are anticipated mainly along J Street from 63rd Street 8th to 15th and 15th Street from J to K/L alley, 13th Street from just north of the I/J Alleyway to the L Street, the K/L Alleyway alley from 9th to 12th and from 15th to 17th, and L Street from 12th to 15th Street. The proposed system extensions are depicted in the Sacramento Downtown Specific Plan – Electrical exhibitFigure VH-1. In addition, SMUD is replacing the existing Station A site to a parcel directly north and across Government Alley (will become Station G) from the current site to meet current safety regulations and continue to provide reliable electrical service to the Downtown Grid area. SMUD is reserving the current Station A site for future 21 kV system improvements and a substation.

Another extension will be required on 7th Street from R Street to the Solons or S/T alley, then heading east west to 6th Street and a section along Rice or R/S alley from 21 Street to 23rd Street. SMUD will reconductor the overhead line on 6th Street from Rice Alley, the R/S alleyS, to T Street. Reconductoring will also be required along 8th Street -from a location near the E/G/E/F alley to the D/E alley (Democracy Alley), then west to 7th-. An extension of an overhead line will be required from Democracy Alley to just north of D Street as well.

The future 21 kV routes and switchgear locations are continually subject to change based on the sequence that sites develop, specific load requirements, other utility conflicts, availability of required space for splicing manholes, duct banks, etc. These routes would provide the 21 kV feeder system to within two blocks of the identified Proposed Projects and Opportunity Sites. Additional infrastructure (switchgear, transformers, conduit, pull boxes, etc.) to serve these sites will need to be determined with SMUD and the individual site developers

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In accordance with SMUD’s Rules and Regulations, offsite infrastructure for the 21_kV extension will be provided by SMUD. All onsite [\(on or adjacent to your parcel\)](#) infrastructure will be provided by the site owner/developer. This is applicable when receiving service from SMUD’s preferred source.

[Site specific improvements are not included in this analysis.](#) The project developer will be required to install service to the proposed project. The proposed development site plan will need to incorporate adequate space (including working clearances) for the placement of above ground pad mounted switches and transformers. If ~~space~~ is not available on the project site or immediately adjacent to the project site, [an alcove on the ground floor exterior section of the building can house pad mounted equipment, otherwise](#) more expensive underground vaults within the street section or building setback will be required. These vaults are very large (typically 9’ x 20’), and costly to install. The costs of the transformer(s), switch(es), and installation are paid by the project developer. To eliminate the challenge and expense of installing the underground vaults, developers are encouraged to plan adequate space for pad mounted switch(es) and transformer(s) when developing the project site plan. [For approximate equipment space requirements, refer to: SMUD.org/Business/Support & Services/Design Construction Services/Downtown Commercial/Electric Service in Downtown Sacramento \(pdf\).](#)



Sacramento Downtown Specific Plan - Electrical

(To be provided by SMUD)

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TELECOMMUNICATIONS

General

Within the Downtown Specific Plan (DSP) area there are numerous telecommunications providers. The following are the main providers for telephone and cables services.

AT&T – Telecommunications

AT&T supplies local and long distance telephone service, and also data communications, in most of the Sacramento Area. The DSP Downtown Grid area is served by the Main Wire Center at 14th and J Streets.

AT&T serves the Downtown Infrastructure Area with a predominantly underground conduit system. There is a small portion of aerial system at the edge of the Study area on 17th Street northerly of J Street. The main lines are generally located in the streets with the feeder lines located in the alleys.

Recently developed properties often place the aerial facilities underground, generally in a joint trench with other utilities in an alley or along the street frontage. Cabling in underground conduits can be either copper wire or fiber optic cable.

Comcast / AT&T Broadband

Comcast provides cable television service in the Sacramento Area. AT&T Broadband leases conduit space and fiber optic cable capacity from Comcast in the Downtown Sacramento Area.

Comcast serves the Sacramento area with a combination of underground and overhead fiber optic and copper coaxial cable. The signal is generated at a downtown site on N Street near the Capitol, and is distributed to hub sites throughout the service area, from which local service is distributed. There are four different service nodes located in and around the DSP area.

SureWest

In addition to AT&T and Comcast, SureWest Broadband also provides telecommunications service in the Downtown Sacramento Area. Some of their fiber system is actually in the Comcast / AT&T manhole and conduit system.

The SureWest system through the DSP area is centered around the Downtown Core area of the existing larger buildings. SureWest also operates some aerial facilities.

Electric Lightwave

Electric Lightwave, Inc. (ELI) provides data and communications, internet, local and long distance voice communications in the Sacramento area for non-residential customers.

ELI serves the Sacramento area with a combination of underground and overhead fiber optic cable and copper cable. The DSP area is served by a switching site at 650 J Street, and the company has fiber optic connections to most AT&T switching sites. Some customer sites may be connected to ELI facilities using AT&T T-1 connections.

Proposed Telecommunications

The Telecommunications providers have indicated the existing system within the Downtown Infrastructure Study area should be sufficient to serve the Proposed Projects and Opportunity sites with relatively minor additions. In general, service to each of the new sites will be coordinated with the main electrical service in a common joint trench. Typically, a few 2-inch conduits will be added to the joint trench for service to the projects. Extension of the existing systems can also utilize the proposed 21kV conduit trench proposed by SMUD for the electrical system.



OPINION OF PROBABLE CONSTRUCTION COSTS

The costs presented here to construct the infrastructure necessary for the Downtown Specific Plan (DSP) area within the Downtown Grid are intended to be planning level only. Both the Railyards and River Districts Specific Plan Areas have previously prepared financing plans and are excluded from the estimates in this section.

The estimates include the general costs for the overall buildout of the proposed development of the plan area using today's dollars. This estimate is not intended to be utilized for the actual costs for specific projects. The final costs for each specific project will need to be estimated separately and could be considerably different than those shown here due to the uncertainty of the order, timing and scope of the actual development to be constructed. The estimates have been developed solely to give interested parties a magnitude of the scale of the costs of improvements.

The unit costs are based on actual costs of recent development within the Downtown Sacramento, planning level costs utilized by various City departments as well as engineering judgment. Final unit costs for each specific project will depend on the actual labor and materials costs for the conditions at the time of construction. These conditions might include the scope of the development and the schedule of the completion of the project. It should be noted that costs to construct infrastructure within the Downtown Sacramento area are significantly higher than costs generally associate with development in the outlying suburban or previously undeveloped areas due to the increased costs associated with working within existing roadways with numerous existing utilities, traffic control, and limited working hours.

The estimates are generally separated into the corresponding infrastructure report chapters for the different utilities. The estimates are limited to the work within immediate the Study area boundary. Assumptions and clarifications for the costs are noted at the bottom of the individual sheets.

Right-of-way/easement acquisition has not been included in the estimates since it is expected that the improvements will be constructed within the existing road right-of-way.

(Estimates to be determined after initial draft report review)

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APPENDIX A
STREET LIGHT EXAMPLES

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ORNAMENTAL STYLE STREET LIGHT



MAST ARM STYLE STREET LIGHT



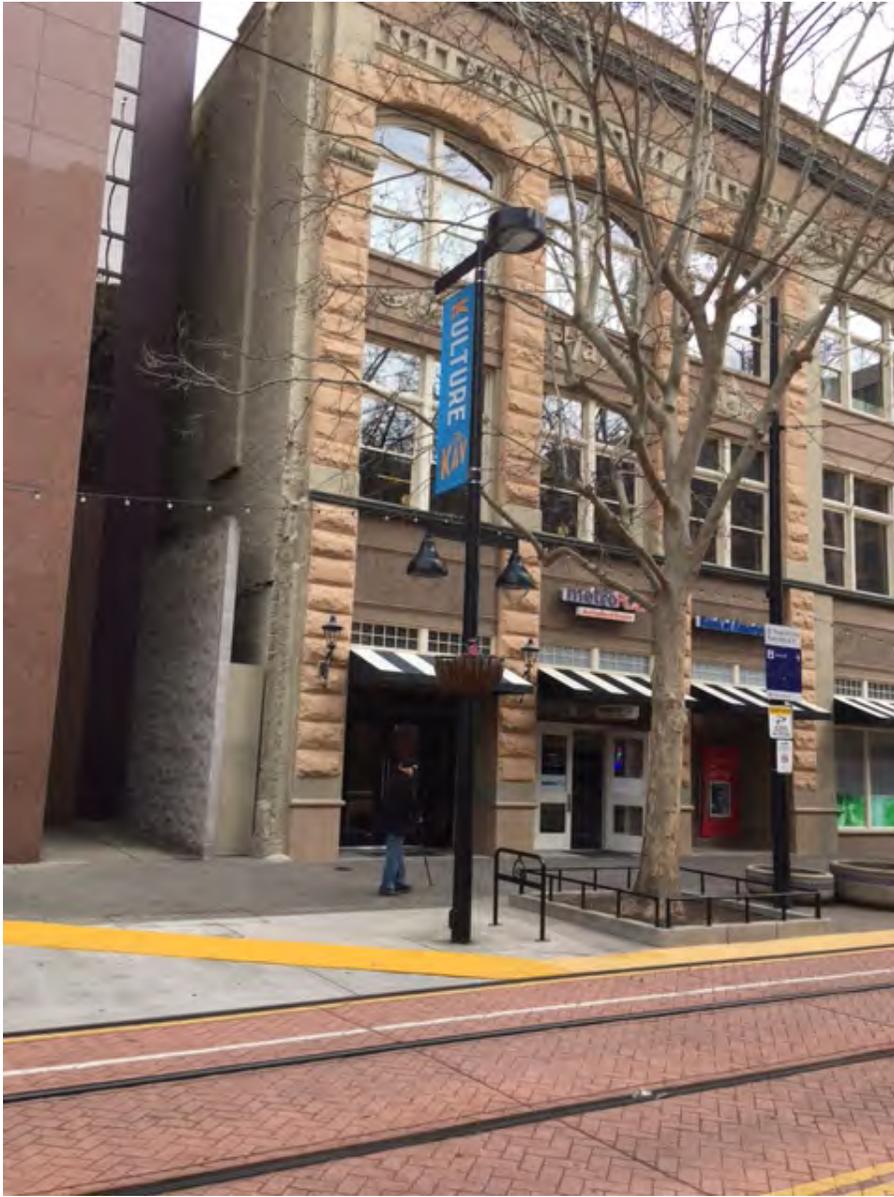
DUAL MAST ARM STYLE STREET LIGHT



SMUD STYLE STREET LIGHT

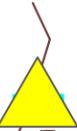


POST TOP STYLE STREET LIGHT



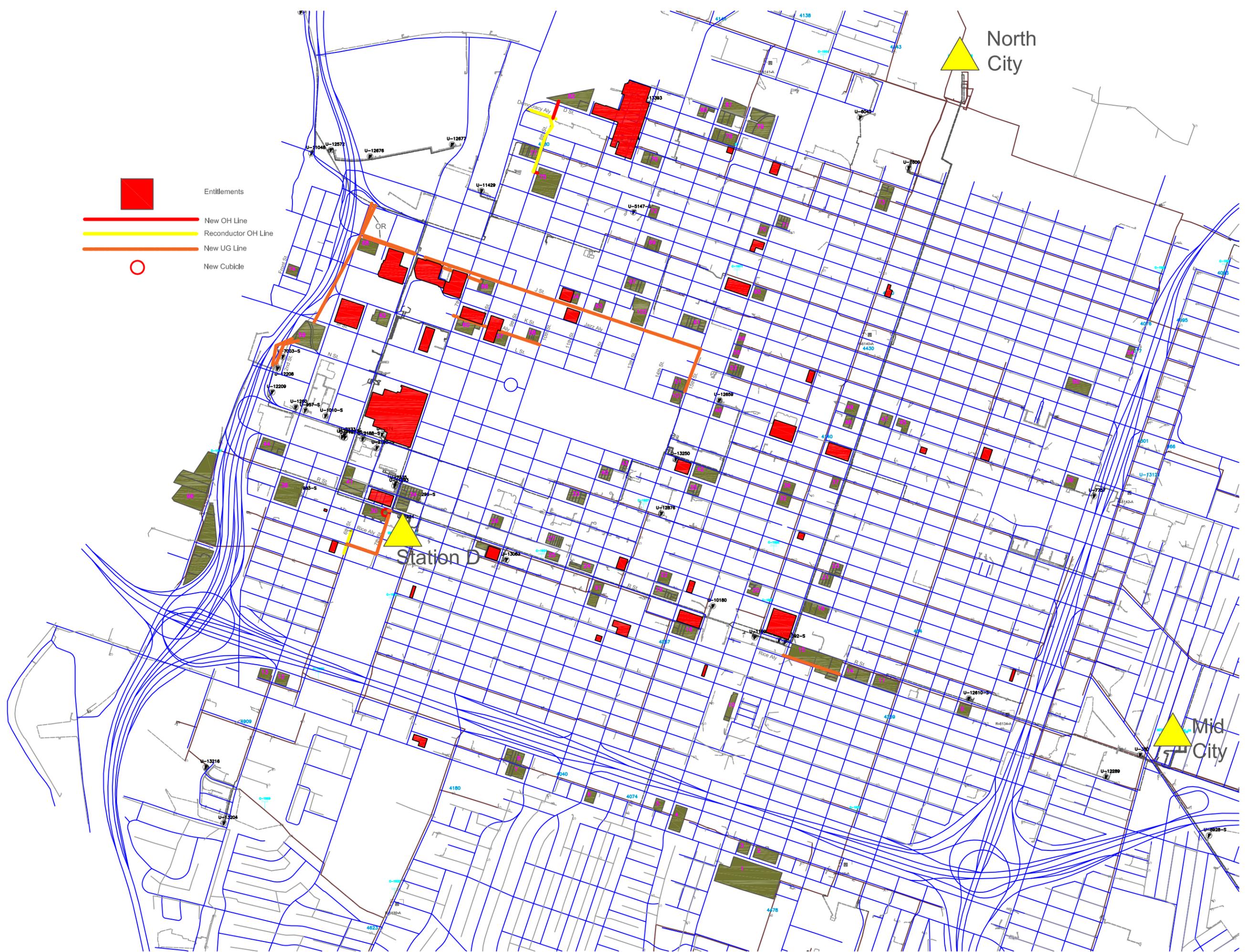
**REGIONAL TRANSIT
LIGHT & BANNER POLE STYLE STREET LIGHT**

-  Entitlements
-  New OH Line
-  Reconductor OH Line
-  New UG Line
-  New Cubicle

 North City

Station D

 Mid City



DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE
2379 GATEWAY OAKS DRIVE, STE 150 – MS 19
SACRAMENTO, CA 95833
PHONE (916) 274-0635
FAX (916) 263-1796
TTY 711



*Serious drought.
Help save water!*

March 16, 2017

03-SAC2017-00113
2017022048

Mr. Tom Buford
City of Sacramento
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811

Downtown Specific Plan (DSP) – Notice of Preparation (NOP)

Dear Mr. Buford

Thank you for including the California Department of Transportation (Caltrans) in the MND public review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The proposed Downtown Specific Plan (DSP) project is implementation of an initiative to develop 10,000 places to live in downtown Sacramento, including land use regulation and policies designed to streamline housing development process and identify necessary public improvements which will support new housing development. The DSP area is bounded by the Sacramento River to the west, the American River to the north (not including the River District and Railyards specific plan areas), and Broadway on the south end. The following comments are based on the NOP including Grid 3.0.

Transportation Analysis

The DSP will utilize the previously developed Grid 3.0 Plan as the Transportation Study in environmental impact disclosure, which was adopted in August 2016, and represents the single most defining aspect of the Central City's transportation system. Grid 3.0 contains several local projects that are slated to occur over a 20 year period; and those projects will move the City toward transportation goals set forth in the City's 2035 GP which focuses more on developing a transportation network that is more suitable for active travel modes. In doing so, the preferred DSP network mostly includes reduction of lanes, additional active transportation facilities (all classes), a reintroduction of 29th and 30th Streets at the State Route 99 (SR-99) Broadway interchange

"Provide a safe, sustainable, integrated, and efficient, transportation system to enhance California's economy and livability"

southbound (SB) on ramp and northbound (NB) off-ramp, and road diets for several core arterials, including a road diet on Broadway.

Caltrans realizes that some of the comments and suggestions provided below may result in substantial revisions to the transportation studies completed for the Grid 3.0 effort. However, Caltrans did not receive prior transportation studies for review during the Grid 3.0 effort, so we were not able to provide input earlier in the process. Caltrans acknowledges there was likely a miscommunication between agencies, and was not an intentional effort on either party to refrain from engagement with the Department in the process. Caltrans appreciated meeting with the City toward the end of the process and receiving a briefing of proposed changes, and we look forward to continued engagement as the DSP progresses.

Caltrans is generally supportive of the proposed improvements within the DSP, and Grid 3.0. Caltrans is highly supportive of projected increases in the use of multi-modal and active transportation systems, as well as improvements to the network that improves efficiency for all modes.

Caltrans would like the DSP Draft Environmental Impact Report (DEIR) to address the following comments and concerns.

- Regarding transit, Grid 3.0 is predicated on the assumption that 30% of new trips will be served by bus and rail modes within the next 20 years. On page 21 of Grid 3.0, the second paragraph begins, "By 2036, the number of all rail vehicles and buses entering the Grid during peak hour is projected to increase by 66 percent and 75 percent, respectively." Caltrans has concerns whether the City has a financial mechanism/plan in place for the planned "Central City" transit system, which would facilitate the expected increase in services listed above.
- Given the concerns listed above, and the expected active transportation modal trip split percentage overall, Caltrans is concerned that lane reductions may cause potential operational issues on the SHS if the expected mode shift is not realized. There are existing major arterials within the downtown area that facilitate the movement of vehicles in and out of the "Central City", and serve as parallel facilities to State routes which border the downtown area, in conjunction with various existing downtown freeway ramp terminals that serve SR 99, SR 51, Interstate 5 (I-5), and United States Highway 50 (US-50). The existing major downtown arterials include 9th, 10th, 12th, 15th, 16th, 29th, I, J, L, N, P, Q Streets, Capitol Ave, Alhambra Blvd, and Broadway. Many of these local facilities are couplets which allow for increased roadway capacities in two directions (i.e.: 15th/16th Streets and I/J Streets). Lane reductions for Capitol Mall, Broadway, J, L, P, Q, 8th, 9th, 10th, 15th, and 16th Streets are included in the Grid 3.0 Preferred Roadway Network on page 4, and as per text the text on pages 25, 45, and 57. With the amount vehicular traffic that currently exists, the prescribed reductions in capacity on J, 16th, P, Q Streets, and Broadway could impact the I-5 / J St, I-5 / Q St, US-50 / Stockton Blvd, US-50 / 16th St. off-ramps, the "W-X section mainline" (US-50 Sacramento Post Miles L2.4 – L0.3), as well as the existing downtown circulation network. A reasonable timeline should be established for when proposed lane reductions can occur, as well as a sound financial and implementation plan for additional reliable transit facilities within the Sacramento "Central City," in order to

avoid potential negative impacts of lane reductions as listed on page 3 of the Grid 3.0. A comprehensive transportation study, based upon current traffic data and operating conditions, should be prepared or modified in advance of the implementation of lane reductions in order to assess the impacts to the transportation network. Operational concerns for all road users of the SHS that may increase the potential for future collisions should be identified in the DEIR and fully mitigated, including nearby SHS interchanges and intersections.

- In an effort to improve existing merge-weave operations on NB I-5 and US 50, Caltrans is proposing that the NB I-5/P street on-ramp and Grid 3.0 impacts on NB I-5/J Street off-ramp be evaluated, including the closure of the P Street on-ramp. This would likely result in a redistribution of the demand for that on-ramp to the other three on-ramps within the downtown area. Caltrans should be consulted and a traffic study should assess potential impacts of the on-ramp closure to the downtown traffic circulation network and the ramps to NB I-5 at I Street, L Street and 5th/W Street/US-50 connector. In addition, if determined to be necessary, the closure of the P Street on-ramp could influence future decisions made regarding changes to the existing downtown Grid, for instance, if the lane reductions and added bike lanes on P Street could continue further west, or if 5th Street could be converted to two-way travel.
- The DSP and Grid 3.0 propose to create 29th and 30th Streets couplets southwest from X Street to the SR 99 / Broadway ramp terminals intersection. Given that the planned Broadway Bridge over the Sacramento River is expected to serve commuters from West Sacramento to the downtown core, the lane reductions on Broadway could prove incompatible with the amount of West Sacramento based trips coming to Sacramento. The proposal to reduce Broadway from 4 to 3 lanes should also be analyzed with these trips in mind in the DEIR.

Encroachment Permit

Construction of 29th and 30th Streets couplets at the SR 99 / Broadway interchange, conversion of P Street to a 2-way facility, and lane reductions on L and J Streets will trigger a Caltrans Encroachment Permit application process. Please be advised that any work or traffic control that would encroach onto the State Right of Way (ROW) requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to the address below.

Charles Laughlin
California Department of Transportation
District 3 Office of Permits
703 B Street
Marysville, CA 95901

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information.

<http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Please provide our office with copies of any further actions regarding this project. We would

Mr. Tom Buford / City of Sacramento
March 16, 2017
Page 4

appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Arthur Murray at 916-274-0616 or by email at: arthur.murray@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Eric Fredericks". The signature is written in a cursive, flowing style.

ERIC FREDERICKS, Chief
Office of Transportation Planning – South Branch



**SACRAMENTO AREA
BICYCLE ADVOCATES**

909 12th St, Ste. 116
Sacramento, CA 95814

sacbike.org
saba@sacbike.org
916 444-6600

March 17, 2017

Tom Buford, Senior Planner
Community Development Department
City of Sacramento
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
tbuford@cityofsacramento.org

Subject: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Downtown Specific Plan (DSP)

Dear Mr. Buford:

Thank you for the opportunity to comment on the subject NOP and on the environmental analysis to be presented in the EIR. We strongly support the City's Downtown Housing Initiative and its goals of increasing density, quality, diversity, and affordability of downtown residential living. As we see in cities like San Francisco, Portland, Seattle and Washington, D.C., having a robust multi-modal transportation system is key to ensuring that current and future residents can easily and comfortably travel throughout the Grid without relying on a single occupancy vehicle. As stated in the NOP, the DSP will identify the public improvements in the transportation system needed to support new housing development.

We understand that Grid 3.0, the City's downtown transportation plan, will become the Mobility Element of the DSP. Grid 3.0 proposes valuable improvements for increasing multi-modal access in the DSP area, including new bike lanes, lane reductions (road diets), and 2-way conversions of 1-way streets. While these and other improvements proposed in Grid 3.0 are vital to the success of the DSP, they fall short of ensuring adequate access by bike throughout the Grid, especially in the northwest quadrant west of 15th Street and north of R Street, site of the City's highest concentration of key public destinations (i.e., City Hall, Main Library, State Capitol, Community Center, Golden 1 Center, Sacramento Valley Station) and workplaces.

The Grid 3.0 findings were finalized and approved by the City Council in August 2016 without the public being given a chance to comment and request improvements. For this reason, we see development of the DEIR as the best opportunity for ensuring that the transportation network in the Grid takes full advantage of the neighborhood's potential for safe, convenient travel by biking, walking and public transit. Our comments below reflect opportunities for improving on the Grid 3.0 findings.

The Preferred Bicycle Network contained in Grid 3.0 serves as the downtown portion of the Sacramento Bicycle Master Plan (BMP), also adopted by City Council in August 2016. The adopted goals of the BMP are to increase ridership, improve safety, increase connectivity, and ensure equity. The plan aims to increase the bicycle commute mode share to 7%; eliminate all fatal bike collisions; create a citywide network of continuous low-traffic-stress bikeways; and ensure equitable bikeway investments in all neighborhoods. Achieving the goal of increasing ridership also helps the City achieve other important citywide and regional goals such as improving air quality, slowing climate change, reducing traffic congestion, and improving public health.

We request that the EIR conduct a thorough impact analysis of how the DSP provides or does not provide adequate access by bicycle to important destinations within and surrounding the DSP area. The design of this analysis must consider two questions:

- What are the important destinations to which access by bicycle must be provided?
- How is adequacy of bicycle access to be measured?

If adequate bicycling access to important destinations is not provided by the DSP, it will cause a significant impact that must be mitigated.

Important Destinations for Bicycle Access. In the specific context of the Downtown Housing Initiative, important destinations are the opportunity sites for near-term residential development. These sites are concentrated in the R Street Corridor, the Broadway Corridor, and in the northwest quadrant of the DSP area. Important destinations also are the employment centers, transit hubs, civic amenities, shopping districts, and entertainment venues to which residents will want to travel. Finally, because the DSP area is surrounded by barriers that limit access (i.e., freeways and rivers), important destinations also include the gateways through these barriers to and from surrounding residential neighborhoods.

Adequacy of Bicycle Access. The adequacy of bicycle access depends on the availability of continuous low-traffic-stress bikeways suitable for all ages and abilities of riders to access the important destinations. “Low-traffic-stress” means bikeways on which riders are protected from high speed and high volume traffic (Class IV protected bikeways), bikeways that are on roadways with only low speed and low volume traffic (Class II bike lanes or Class III bike routes), or bikeways completely isolated from traffic (Class I bikeways) (Mekuria et al., 2012. *Low-stress bicycling and network connectivity*. Report 11-10. Mineta Transportation Institute, San Jose). This low-traffic stress definition is based on studies that have shown that perceived traffic danger is the primary factor that keeps people from bicycling for transportation.

Sacramento is developing a citywide Vision Zero action plan to eliminate deaths and serious injuries from traffic collisions among all modes. The importance of defining low-traffic-stress bikeways is demonstrated in some of the data being used to drive that action plan: 1) roadways with speed limits over 25 mph represent only 21% of the City’s roadways but 80% of bike collisions with riders killed or severely injured (KSI), and 2) arterials and collectors represent only 23% of the City’s roadway network but 79% of the KSI bike collisions. Adequate bicycle access can only be provided on bikeways with low vehicle speeds and volumes or where bikeways are protected or separated from higher vehicle speeds and traffic volumes.

The importance of this low-stress definition is also demonstrated by the classification of the general population according to their interest in bicycling: Fewer than 8% of people are willing to ride with traffic or in bike lanes next to moderate-to-high-speed, high-volume traffic. Another 60% of people are interested in bicycling but concerned about interacting with traffic; they are only comfortable riding where separated or protected from high-speed, high-volume traffic (see Mekuria et al. 2012). The remaining 33% of people are never interested in bicycling for transportation. Meeting Sacramento’s goal of increasing bicycle ridership requires accommodating those 60% of people who are “interested but concerned.” Therefore, we must develop a low-traffic-stress network on which these riders can get to important destinations.

The City’s BMP was recently updated to add guidance for the placement of bikeway facilities based on roadway volumes and speeds (page 41 of the BMP): Class II bike lanes should only be used up to volumes of about 12,000 ADT and speeds of 35 mph, enhanced Class II bike lanes (buffered bike lanes) should be used with volumes of 12,000 – 20,000 ADT and speeds of 35 – 45 mph, and Class IV separated bikeways (protected bike lanes or cycle tracks) should be used at greater volumes and speeds. Site-specific conditions may cause variances from these guidelines.

Further incentive for ensuring the adequacy of bicycle access in the DSP area can be found in the launch of the Sacramento regional bike share system. The system will enable commuters and visitors to use share-bikes located throughout downtown area for short-term rentals. The success of this system will depend on downtown streets that enable bike-share customers to safely and comfortably travel to key destinations throughout the downtown area, even if inexperienced with bicycling or unfamiliar with downtown streets.

Impact Analysis Requested in the DEIR

We request that the DEIR analyze the extent to which bicyclists will be able to travel to important destinations and gateways of the DSP area on continuous low-stress bikeways. If low-traffic-stress access is not provided, bicycling mode share will not increase, and the DSP will cause a significant adverse impact on bicycling. The following paragraphs describe some example cases for which this impact analysis should be conducted.

Infill Residential Developments

Several infill residential projects are now undergoing final designs and entitlement approvals:

1. The 19J project will be located on two one-way arterials, 19th St with bike lanes and J Street without bike lanes. Under Grid 3.0, 19th St will become 2-way to the north of the project but not to the south. Thus bicycling access to the project will be inadequate to and from the west and from the east on J St and the south on 19th St. Residents and visitors to the project will thus not have low-stress bicycle access from several directions and will need to use sidewalks or alleys to access the site.
2. 800 K/L residential/commercial project will be bounded by K Street, L St. and 8th St. Although K St. is low speed and low volume, the presence of double light-rail tracks causes near-daily crashes by people on bikes, including those who are skilled with riding. 8th St. and L St. are arterial streets without bikeways. Bicyclists will not have low-stress access to the site from any direction.

Opportunity Sites for Future Infill Development

1. Several opportunity sites are located in the northwest quadrant of the DSP area west of 8th St and between I Street and Capitol Mall. Low-traffic-stress bicycle access is not currently provided in this quadrant due to existing bike lanes are on high-volume, high-speed, and one-way arterials (I, J, L, 8th and 7th streets) and are not continuous on some blocks, forcing riders to mix with vehicle traffic. No bikeway improvements are proposed in this area under Grid 3.0.
2. The 16th Street Corridor for its entire length through the DSP area has residential opportunity sites and is an emerging commercial district. Under Grid 3.0, it will receive a one-way buffered bike lane as far north as N Street at some time in the future, but no bikeway improvements are proposed further north.

Important Destinations

The DSP area holds many important destinations to which low-stress bicycle access should be provided and the DEIR should disclose if not.

1. The Sacramento Valley Station cannot currently be accessed from any direction on continuous low-stress bikeways, and those traveling by bike cannot ride directly south

from the station. Under Grid 3.0, low-stress access will become possible from the Sacramento River bike trail and from the northeast on F Street (but with uncertain timing). Low-stress access will continue to be unavailable from and to the south and east, including the Capitol and the heart of the downtown. The new Kaiser Medical Center, located nearby at 501 J Street, will have the same limitations.

2. The Golden 1 Center and the adjacent plaza being branded as the “Downtown Commons” also cannot be accessed by low-stress bikeways. The bordering streets of J St on the north and 5th St on the west have bike lanes but they are placed next to high-speed, high-volume traffic.
3. The Bank “culinary palace” project at 7th and J Streets is located on two high-volume, one-way arterials; only J Street has bike lanes. This location does not have low-stress access from any direction and Grid 3.0 does not propose any improvements in its vicinity.

Gateways to the DSP Area

The gateways under the freeways on the east and south sides of the DSP area are the exclusive access points for bicycles from adjacent neighborhoods. The gateways to the south link the Broadway corridor and its many opportunity sites to the main DSP area. These gateways are particularly hazardous for bicyclists due to the high speed of vehicles on adjacent frontage streets (W, X, 29th and 30th streets) that lead to and from freeway ramps.

Several of these gateways are proposed for improvement using buffered bike lanes (enhanced Class II) under the W-X portion of Capital City Freeway, but other important gateways will not be improved; these often lack bike lanes. Making the bikeways through these gateways low-traffic-stress is an easy and inexpensive way to greatly increase bicycling mode share for commuting into the DSP area, improving air quality, and reducing traffic congestion, especially from neighborhoods like northwest Land Park and North Oak Park, where bicycle ridership is lower than in adjacent neighborhoods.

1. The 5th Street gateway is the critical route linking northwest Land Park (and The Mill infill project) to the Golden 1 Center, Sacramento Valley Station and Kaiser Medical Center.
2. The gateway at Riverside Boulevard/ 11th Street is the critical link from residential neighborhoods like Land Park and Hollywood Park to the State Capitol and surrounding employment centers.
3. The 24th and 26th street gateways are critical links between the neighborhoods of Curtis Park and Oak Park and the DSP area.
4. The T and Folsom/Capitol gateways are critical links to the neighborhoods of Oak Park, Tahoe Park, and East Sacramento.
5. The 16th Street gateway under the railroad to North 16th Street is a critical link to businesses and residences north of the railroad.

Needed improvements to avoid significant impacts on bicycling

We request that the DEIR for the DSP evaluate the full potential for adding the following low-stress bikeways to reduce possible impacts on bicycling by the DSP:

1. L Street: 1- or 2-way separated bikeway (Class IV) between 15th St. and 5th St. This bikeway is urgently needed due to the concentration of key destinations along L St. and the lack of an east–west low-stress bikeway into and through the northwest quadrant of the DSP area (none is proposed under Grid 3.0 for several blocks to the south and north of L Street).
2. 5th Street: Separated or buffered bike lanes in both directions between Broadway and the Sacramento Valley Station. There are no other low-stress routes to either destination for many blocks to the east and west.
3. 7th and 8th streets: Buffered bike lanes (enhanced Class II) between G and P streets.
4. J Street: Buffered bike lanes for the entire length through the DSP area. While Grid 3.0 proposes a 3-to-2 road diet on the Midtown portion of J Street, the DEIR should also analyze the potential for a 2-way conversion of J between 19th and 30th streets to maximize access by bike, among many other benefits.
5. P and Q streets: Buffered bike lanes (enhanced Class II) between 3rd and 9th streets.
6. 16th Street: Buffered bike lanes for entire length through the DSP area, with a 2-way separated bikeway (Class IV) through the gateway to North 16th St and its destinations. Bike access into and out of the north edge of the DSP area is currently limited to one southbound street.
7. Gateways at 5th, Riverside-11th, 24th, 26th, H, Capitol, and T Streets as low-stress bikeways.

The proposed project will cause a significant adverse effect on the environment if it will not adequately provide continuous low-traffic-stress access by bicycle throughout the DSP and between the DSP and surrounding neighborhoods. Please ensure that the DEIR fully examines and addresses this possible impact of DSP implementation.

SABA works to ensure that bicycling is safe, convenient, and desirable for everyday transportation. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient, and least congesting form of transportation.

Thank you for considering our comments.

Sincerely,


Jordan Lang
Project Analyst

CC: Joseph Hurley, Sacramento Air Quality Management District (jhurley@airquality.org)
Jennifer Donlon Wyant, Sacramento Active Transportation Program Specialist (jdonlonwyant@cityofsacramento.org)

**Environmental Management
Department**

Val F. Siebal, Director



County of Sacramento

March 17, 2017

Sent via Electronic Mail

Tom Buford, Senior Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
Email: tbuford@cityofsacramento.org

**SUBJECT: SACRAMENTO COUNTY ENVIRONMENTAL MANAGEMENT DEPARTMENT
COMMENTS REGARDING THE NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE DOWNTOWN SPECIFIC PLAN**

Dear Mr. Buford:

The Sacramento County Environmental Management Department (EMD) has reviewed the above Environmental Document for the proposed Downtown Specific Plan (DSP). The entirety of the project is within the City of Sacramento, Sacramento County. The DSP Area is generally bounded by the Sacramento River to the west; Business 80 (Route 51) to the east; the American River on the north (not including the River District and Railyards specific plan areas), and Broadway on the South.

EMD has been designated as the Sacramento region's Certified Unified Program Agency (CUPA) by the California Environmental Protection Agency (Cal EPA), the Local Enforcement Agency (LEA) for the California Department of Resources, Recycling and Recovery (Cal Recycle), and acts as the local regulatory agency for wells, onsite wastewater treatment systems, noise, and other environmental health related programs. EMD is providing comments for public health and environmental safety considerations that should be addressed in the Environmental Document.

HAZARDS AND HAZARDOUS MATERIALS

The CUPA program comments focus on Hazardous Materials and Hazardous Waste related to the DSP as follows:

- 1) Hazardous Materials Handling and/or Storage: If the handling and/or storage of hazardous material equal to or greater than the minimum reportable quantities (55 gallons for liquids, 500 pounds for solids and 200 cubic feet (at standard temperature and pressure) for compressed gases) occurs at any laydown area along the project, separate hazardous materials permits may be required for each location. Permits are business and owner specific and may not be transferred to other owners or locations. Also, incorporate adequate protections for the public health and the environment and groundwater from risks or adverse effects associated with the storage of hazardous materials. Please address the handling and/or storage of hazardous materials.

- 2) Hazardous Waste Generation: If hazardous waste is generated at any laydown area within future projects within the DSP, separate hazardous waste permits may be required for each location. Permits are business and owner specific and may not be transferred to other owners or locations. Since construction of the project is anticipated to last until 2020 the construction exemption outlined in Sacramento County Code (SCC) section 6.96.095 may not apply. Also, incorporate adequate protections for the public health and the environment and groundwater from risks or adverse effects associated with the generation of hazardous waste. Please address how the DSP will ensure compliance with the Hazardous Waste Control Act, verify Hazardous Waste accumulation, labeling, container and tank management standards, and waste generator status, and respond to complaints of illegal disposal of hazardous waste. Please address the generation of hazardous waste.

- 3) California Accidental Release Prevention (CalARP) Program: CalARP was adapted from the Federal accidental release program established by the Clean Air Act Section 112 (r) and modified to meet California's needs. The purpose of the CalARP Program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws. This is accomplished by requiring businesses that handle more than a threshold quantity of a regulated substance listed in tables 1-3 of the California Code of Regulations, Title 19, Division 2, Chapter 4 to develop a Risk Management Plan (RMP). An RMP is a detailed engineering analysis of the potential accident factors present at a business and the mitigation measures that can be implemented by the business to reduce this accident potential. The regulation requires that a business estimate the offsite receptors that could be affected by a hypothetical release of the regulated substance. Offsite receptors include residences, institutions (e.g. schools, hospitals, prisons), industrial, commercial and office buildings, parks or recreational areas inhabited or occupied by the public at any time where members of the public could be exposed to toxic concentrations, radiant heat, or overpressure, as a result of an accidental release. The point of identifying public receptors is to locate those places where there are likely to be, at least some of the time, members of the public whose health could be harmed by short-term exposure to an accidental release.

If you have any questions or concerns regarding the CUPA's comments, please contact Jeni VanDusen at (916) 875-8418 or VanDusenJ@saccounty.net

The Site Assessment and Mitigation program comments focus on soil contamination as follows:

- 1) EMD requests that it be added to the appropriate regulatory agency notification list for any additional unknown contamination discovered during development, assessment, and remediation activities.

If you have any questions or concerns regarding the Site Assessment and Mitigation program comments, please contact Charley Langer at (916) 875-8474 or LangerC@saccounty.net

The Onsite Wastewater Treatment System (OWTS) program comment focuses on potential existing septic tanks due to the Project areas historic use as follows:

- 1) Any septic systems that are discovered within the DSP must be identified and destroyed under a permit from EMD.

If you have any questions or concerns regarding the OWTS comments, please contact Jack Bellan at (916) 876-7560 or BellanJ@saccounty.net

SOLID WASTE

The LEA's comments focus on concerns regarding solid waste facilities, including landfills, as follows:

- 1) **Litter:** Despite California Vehicle Code regulations requiring solid waste collection vehicles to secure their loads, some litter does escape from vehicles hauling solid waste to the landfill. While the LEA enforces regulations requiring solid waste facilities to control litter coming from the site they are not necessarily responsible for litter coming off of trucks heading to the site. The onus for disposal of litter that accumulates on private property is on the property owner. It is recommended that property owners be made aware of the potential for litter accumulation on their property and their responsibility for disposal.
- 2) **Odors:** Solid waste facilities are required to prevent nuisances, however, despite the fact that odors are a constant concern at solid waste facilities, it should be noted that the LEA has very limited authority in regards to controlling odors and cannot specifically prohibit odors in the Solid Waste Facility Permit. The generation of odors during routine operation of active landfills and other solid waste facilities is unavoidable and are associated with activities such as the delivery, processing and compacting of waste, the processing of green material, leachate collection and handling, and the operation of the flare. Individuals working and living near solid waste facilities may also be exposed to unpleasant odors from waste collection vehicles on their way to and from solid waste facilities. Inactive and closed landfills may produce odors associated with extracting and flaring landfill gas.

Noise: Active solid waste facilities generate a variety of noises associated with their activities as well as with the coming and going of collection vehicles and other vehicles. It is recommended that residents be advised of the potential for noise from the nearby solid waste facilities. Even inactive and closed landfills may have noise generating activities associated with closure construction, maintenance, and post-closure land uses.

- 3) **Aesthetics:** Many solid waste facilities must have adequate lighting under 27 CCR. Some tenants may find the light bothersome. Some landfills, including inactive and closed landfills may have elevated fill areas that are highly visible to surrounding areas.
- 4) **Vector Control:** Solid waste facilities must implement measures to control the propagation, harborage, and attraction of vectors and to minimize problems associated with birds at the landfill. However, pest and bird control measures taken at these sites may push these animals out into surrounding areas, where they may find refuge and food sources in nearby neighborhoods. Landfills are not responsible for controlling birds or vectors outside of their boundaries.
- 5) **Landfill Gas:** Landfilled waste generates landfill gas, including methane which is flammable and explosive. Although landfills are required to control their landfill gas and monitor methane levels at the permitted boundary of the landfill, off-site migration of landfill gases are always a possibility and can pose a threat to surrounding homes and businesses. Although the LEA does not have authority over homes and businesses outside a landfill's permitted boundary, the LEA recommends that all structures to be built within 1000' of landfilled waste be built with protective measures such as foundation gas barriers, ventilation measures and explosive gas detection and alarm systems, per 27CCR, section 21190.

The LEA recommends notifying potential tenants of the above-outlined issues associated with purchasing a property located near solid waste facilities. Placing a neighborhood development near a landfill or other solid waste facility is likely to result in complaints.

If you have any questions or concerns regarding the LEA's comments, please contact John Lewis at (916) 876-7279 or LewisJoh@saccounty.net

GROUNDWATER

The Well program comments focus on concerns about the impact of future development on groundwater, as follows:

- 1) All new wells must be constructed under EMD's permitting process and meet EMD well construction standards. Wells include but are not limited to monitoring wells, piezometers, environmental and/or geotechnical exploratory soil borings. EMD standards are more restrictive than the minimum state standards in order to protect Sacramento County's groundwater supply.
- 2) In order to protect the groundwater from potential surface contamination, wells not intended for future use need to be destroyed under a permit from EMD prior to any future grading activities.

Thank you again for the opportunity to provide comments on the Notice of Preparation of an Environmental Impact Report for the Downtown Specific Plan. If you have any questions, please feel free to contact me at (916) 876-7277 or at hunleyc@saccounty.net

Sincerely,



Christopher Hunley, REHS
Environmental Compliance Division
Sacramento County Environmental Management Department



March 17, 2017

Submitted by e-mail

Tom Buford, Senior Planner
City of Sacramento
Community Development Dept.
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811-0218
E-mail: TBuford@cityofsacramento.org

Re: Notice of Preparation of EIR for the Downtown Specific Plan

Dear Mr. Buford:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Downtown Specific Plan (DSP). I attended the Scoping Meeting on March 2, 2017 and submitted additional comments and suggestions via the online survey.

There are numerous mid-20th century resources (including, but not limited to, commercial, institutional, residential resources) located within the “opportunity sites,” identified corridors, and Tier Areas in the DSP.

Some of these resources will likely be identified via our current collaborative project — the Mid-Century Modern Historic Resources Survey / Historic Context Project — in conjunction with the Community Development Department and its consultants this year. I anticipate and trust that City planners will use the results from the survey as a reference when considering opportunity sites.

However, our survey will be limited to mid-20th century modern resources built around and between 1940 and 1970. There are still many pre-1940 and post-1970 significant resources that still need to be identified.

- What measures will be taken by the City and DSP to ensure ALL potential historic resources are identified that are 1) located within the opportunity site areas, and; 2) will become 50 years old during the duration of the DSP?

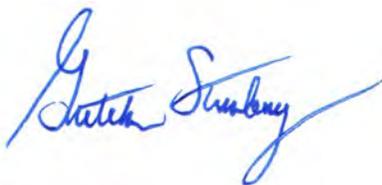
A 501(c)(3) non-profit organization dedicated to promoting, preserving and protecting modern art, architecture and design in the Sacramento region.

Gretchen Steinberg 4910 South Land Park Drive, Sacramento, CA 95822
gretchen@SacMod.org
SacMod.org

- What measures will be taken by the City and DSP to encourage adaptive re-use and provide the opportunity for historic rehabilitation tax credits?
- What measures will the City and DSP take to effectively prevent negative impacts from the scale and massing of new and modified buildings/structures to existing residences, buildings, and historic districts?
- What measures will be taken by the City and DSP to ensure preservation of greenspaces, parks, and our city's urban forest? Further, what measures will be taken to proportionally increase these resources to match the needs of the incoming and current residents?
- What measures will be taken by the City and DSP to ensure that new housing units meet a diverse range of housing needs, are affordable by design, and support a safe and healthy community?

We are grateful for the opportunity to proactively work together with the City to ensure our cityscape represents a true cross-section and walk through time, with all periods and cultures elevated and celebrated. As always, I offer SacMod's assistance to the City to ensure significant mid-20th century historical and cultural assets are preserved for future generations to enjoy.

Respectfully submitted,



Gretchen Steinberg, President, SacMod



3/23/2017

VIA EMAIL

Tom Buford, Senior Planner
City of Sacramento Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: Notice of Preparation of an Environmental Impact Report for the Downtown Specific Plan

Dear Mr. Buford:

WALKSacramento provided comment March 17, 2017 on the Notice of Preparation of an Environmental Impact Report (EIR) for the Downtown Specific Plan (DSP). Subsequently, the subject of leading pedestrian interval (LPI) signals and vehicle delay in the downtown area came to our attention. With this subject in mind, we recommend adding additional analysis to the DSP Draft EIR.

LPI's have been shown to significantly improve pedestrian safety^{1,2}. Pedestrian safety is a top priority for Grid 3.0 and the City's Vision Zero Action Plan, and it should also be a top priority for the DSP. We recommend the DEIR analyze the safety and mobility impacts of implementing LPI's on a broader scale within the DSP area, particularly in areas of high pedestrian traffic such as the Central Business District, Midtown and the R Street corridor.

We also recommend that safety analyses include comprehensive crash costs² that evaluate the full costs associated with pedestrian collisions. Comprehensive crash costs include items such as medical care, loss of productivity, public assistance, emergency response, and economic value of the loss in quality of life. Including such items in the analysis would help to better compare the personal and societal costs of pedestrian collisions to congestions costs of delay, air pollution and emotional stress.

WALKSacramento is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling. The benefits include improved health, less motor vehicle traffic congestion, better air quality, and a stronger sense of cohesion and safety in local neighborhoods.

Thank you for your consideration of these comments and recommendations.

Sincerely,

Chris Holm
Project Manager

¹ J. Mead, C. Zegeer and M. Bushell, "Evaluation of Pedestrian-Related Roadway Measures: A Summary of Available Research," Federal Highway Administration Report DTFH61-23 11-H-00024, www.pedbikeinfo.org, 2013.

² A.C. Fayish and Frank Gross, "Safety effectiveness of leading pedestrian intervals evaluated by a before-after study with comparison groups," Transportation Research Record No. 2198 (2010): 15-22.



MIWOK United Auburn Indian Community
 MAIDU of the Auburn Rancheria

Gene Whitehouse
 Chairman

John L. Williams
 Vice Chairman

Calvin Moman
 Secretary

Jason Camp
 Treasurer

Gabe Cayton
 Council Member

COMMUNITY DEVELOPMENT
 DEPARTMENT

MAR 28 2017

RECEIVED

March 14, 2017

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

Subject: Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the Downtown Specific Plan

Dear Tom Buford,

Thank you for requesting information regarding the above referenced project. The United Auburn Indian Community (UAIC) of the Auburn Rancheria is comprised of Miwok and Southern Maidu (Nisenan) people whose tribal lands are within Placer County and whose service area includes El Dorado, Nevada, Placer, Sacramento, Sutter, and Yuba counties. The UAIC is concerned about development within its aboriginal territory that has potential to impact the lifeways, cultural sites, and landscapes that may be of sacred or ceremonial significance. We appreciate the opportunity to comment on this and other projects. The UAIC would like to consult on this project.

In order to ascertain whether the project could affect cultural resources that may be of importance to the UAIC, we would like to receive copies of any archaeological reports that are completed for the project. We also request copies of environmental documents for the proposed project so that we have the opportunity to comment on appropriate identification, assessment and mitigation related to cultural resources. We recommend UAIC tribal representatives observe and participate in all cultural resource surveys. If you are interested, the UAIC's preservation department offers a mapping, records and literature search services program that has been shown to assist project proponents in complying with the necessary resource laws and choosing the appropriate mitigation measures or form of environmental documentation during the planning process.

The UAIC's preservation committee would like to set up a meeting or site visit, and begin consulting on the proposed project. Based on the preservation committee's identification of cultural resources in and around your project area, UAIC recommends that a tribal monitor be present during any ground disturbing activities. Thank you again for taking these matters into consideration, and for involving the UAIC early in the planning process. We look forward to reviewing the documents requested above and consulting on your project. Please contact Marcos Guerrero, Cultural Resources Manager, at (530) 883-2364 or by email at mguerrero@auburnrancheria.com if you have any questions.

Sincerely,

Gene Whitehouse,
 Chairman

CC: Marcos Guerrero, CRM

3/17/2017

SENT VIA EMAIL

Tom Buford, Senior Planner,
City of Sacramento Community Development Department,
300 Richards Blvd., Third Floor, Sacramento, CA 95811.
Tele (916) 808-7931
E-mail: tbuford@cityofsacramento.org

RE: Notice of Preparation for the Downtown Specific Plan

Dear Mr. Buford,

The Sacramento Metropolitan Air Quality Management District (SMAQMD) is the local agency in Sacramento County responsible for air quality attainment, permitting and enforcement activities. The SMAQMD participates in the California Environmental Quality Act intergovernmental review process as either a responsible or reviewing agency. SMAQMD staff is providing the following comments on the Revised Notice of Preparation.

SMAQMD provides air quality, greenhouse gas, and toxic emissions analysis expectations, significance thresholds, and mitigation strategies in its Guide to Air Quality Assessment in Sacramento County, which can be accessed from the SMAQMD's website (<http://www.airquality.org/Businesses/CEQA-Land-Use-Planning/CEQA-Guidance-Tools>). Using this guidance will ensure a thorough air quality analysis is conducted for the project.

Operational Air Quality

SMAQMD staff anticipates that the project will be significant for operational emissions and recommends that the Environmental Impact Report include an Air Quality Mitigation to reduce operational emission by 15% or more. This reduction is consistent with the City's General Plan¹² and SMAQMD guidance documents³. Please consult with the SMAQMD while developing the Air Quality Mitigation Plan.

¹ *Sacramento 2035 General Plan Policy ER 6.1.2 New Development*: The City shall review proposed development projects to ensure projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM10 and PM2.5) through project design. (RDR)

² *Sacramento 2035 General Plan Policy ER 6.1.3 Emissions Reduction* : The City shall require development projects that exceed SMAQMD ROG and NOX operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated project. (RDR)

³ *SMAQMD Guide to Air Quality Assessment in Sacramento County*: <http://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools>

General Comments

All emissions calculations and analysis assumptions should be included in the draft environmental document. Please provide notice to the SMAQMD when the draft environmental document is available for review.

All projects are subject to District rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling (916) 874-4800. The District thanks the City of Sacramento for the opportunity to comment on this project. If you have additional questions or require further assistance, please contact me at jhurley@airquality.org or (916) 874-2694.

Sincerely,

JJ Hurley
Associate Air Quality Planner/Analyst
Sacramento Metropolitan Air Quality Management District
777 12th Street, 3rd Floor
Sacramento, CA 95814

ATTACHMENT

SMAQMD Rules & Regulations Statement (revised 1/2017)

*The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the SMAQMD early to determine if a permit is required, and to begin the permit application process. Other general types of uses that require a permit include, but are not limited to, dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower is required to have a SMAQMD permit or a California Air Resources Board portable equipment registration (PERP) (see Other Regulations below).

Rule 402: Nuisance. The developer or contractor is required to prevent dust or any emissions from onsite activities from causing injury, nuisance, or annoyance to the public.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 417: Wood Burning Appliances. This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 453: Cutback and Emulsified Asphalt Paving Materials. This rule prohibits the use of certain types of cut back or emulsified asphalt for paving, road construction or road maintenance activities.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Other Regulations (California Code of Regulations (CCR))

17 CCR, Division 3, Chapter 1, Subchapter 7.5, §93105 Naturally Occurring Asbestos: The developer or contractor is required to notify SMAQMD of earth moving projects, greater than 1 acre in size in areas “Moderately Likely to Contain Asbestos” within eastern Sacramento County. The developer or contractor is required to comply with specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

13 CCR, Division 3, Chapter 9, Article 5, Portable Equipment Registration Program: The developer or contractor is required to comply with all registration and operational requirements of the portable equipment registration program such as recordkeeping and notification.

13 CCR, Division 3, Chapter 9, Article 4.8, §2449(d)(2) and 13 CCR, Division 3, Chapter 10, Article 1, §2485 regarding Anti-Idling: Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes. These apply to diesel powered off-road equipment and on-road vehicles, respectively.



PRESERVATION SACRAMENTO

PO Box 162140, Sacramento CA 95816 – preservation.sacramento@gmail.com – PreservationSacramento.org

March 14, 2017

Tom Buford, Senior Planner
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

RE: Preservation Sacramento Response to Notice of Preparation, Downtown Specific Plan

The Board of Directors of Preservation Sacramento would like to comment regarding potential environmental impacts on historic resources within the boundary of the Downtown Specific Plan, specifically in the areas of proposed corridors, nominated but unlisted historic districts, and alley development units vs. lot split development. Our main recommendation to limit environmental impacts and achieve city goals is a comprehensive survey of the entire plan area to locate currently unidentified potential historic resources and districts.

Previous public meetings regarding this issue identified only the R Street Corridor, with announcement of a survey for historic resources along R Street. The map accompanying the NOP includes multiple additional corridors, including 12th, 16th, I, J, and 21st Street corridors. If the project will result in rezoning and other proposed changes in land use along these corridors, surveys of these corridors for historic resources should be performed, in order to determine if the proposed changes will have a negative impact on listed *or unidentified* historic resources in these additional corridors.

During the period 2000-2010, the city of Sacramento received multiple surveys for historic districts within the affected area that were set aside for review but not moved forward for listing, including Yale Avenue, Yale 2000, Broadway, New Era Park and Richmond Grove districts. Also, the project area includes properties listed in the California Register and National Register but not locally listed, including the New Helvetia Historic District (National Register listed) and Capitol Towers Historic District (California Register listed, National Register eligible) and Old Sacramento (National Historic Landmark.) The eligibility of these districts as historic resources, and the effects of the proposed project on these districts, should be considered.

Recent changes in state law regarding accessory dwelling units, or ADUs (SB 1069) make it easier to build backyard units as a by-right entitlement, up to a maximum size of 1200 square feet, but recent efforts at central city alley/accessory housing focuses more on 4000 square foot buildings accompanied by a three-way lot split, often contested by neighbors and community organizations. The issue of the impact on historic districts by these oversized alley units (often larger than the house fronting the lot) has been raised, thus the effects of this housing type should be considered.



PRESERVATION SACRAMENTO

PO Box 162140, Sacramento CA 95816 – preservation.sacramento@gmail.com – PreservationSacramento.org

As presented to the City of Sacramento’s Preservation Commission on March 15, 2017, the city’s efforts regarding historic resources in context of this project have solely focused on a limited avoidance of existing historic districts (see overlay map on next page showing where historic districts overlap “corridors”), assessment of potential historic properties primarily on city-defined “opportunity sites,” and a survey of the R Street historic district to identify additional contributors to that city district, limited to its existing period of significance. If the purpose of the Downtown Specific Plan is to identify potential obstacles to residential development, it includes little to proactively identify eligible historic resources within the project area. This means that future projects will still have to undergo higher levels of environmental review for their effects on potential historic resources. A comprehensive central city survey as part of the Downtown Specific Plan could proactively identify these resources, achieving the project’s goals of facilitating central city development through infill on vacant lots, adaptive reuse, and other strategies to promote central city housing in an environmentally sustainable manner.

The map on Page 3 was created using an earlier map provided to central city stakeholders showing historic districts within the project boundary; this original map is included on Page 4. At the initial public scoping meeting, each topic of discussion had a map detailing the project area, *except* for the station discussing historic preservation, which had no materials available for review. Historic districts were excluded from the maps at the other stations, and in the Notice of Preparation provided by the city.

To summarize, our primary area of concern regards the effect of unidentified but eligible historic resources within the project boundary. A comprehensive survey, and updates of existing district surveys to bring them up to contemporary standards, would address this concern and achieve city goals.

Garret Root
President, Preservation Sacramento Board of Directors



PRESERVATION SACRAMENTO

PO Box 162140, Sacramento CA 95816 – preservation.sacramento@gmail.com – PreservationSacramento.org

Figure 1: Central city “opportunity sites” and “corridors” map overlaid with city historic district map (green with dark green outline), surveyed but not listed districts (blue) and National Register, California Register and National Historic Landmark districts not listed as local districts (violet.) Corridors are indicated in yellow. Historic district overlay map was included in earlier meeting materials, but excluded from later map showing districts. Note that historic districts and corridors overlap in many areas.





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Figure 2: Initial “opportunity sites” map provided to stakeholders indicating locations of historic districts, but not the boundaries of “corridors” indicated on NOP map; this map was overlaid onto Figure 1 map with addition of NR/CR/NHL districts not locally listed. Historic districts are outlined in green.





Downtown Specific Plan

COMMUNITY OPEN HOUSE

March 20, 2017

Location:

City of Sacramento
New City Hall Lobby
915 I Street

5:30 pm – 7:30 pm

COMMENTS RECEIVED IN RESPONSE TO:

“ARE THERE ANY OTHER ENVIRONMENTAL TOPICS THAT SHOULD BE ADDRESSED IN THE ENVIRONMENTAL IMPACT REPORT?”

Good jobs

Good green jobs

Loss of open space by back alley development on existing residences

Agree – alley development can ruin neighborhood feel

Save/maintain our trees. Plant more

Affordability of housing for all age groups

Yea verily!

Consider wind studies for street level at high rises

Design/intensity/density to help w/ affordability

Save maintain our trees

Save our big trees

Archaeological sites at old Am. River confluence & Calle de los Americans (6A 12th & 24th)



EIR Scoping Meeting: March 2, 2017

Sign-In Sheet

NAME	ADDRESS	EMAIL
✓ William Burg	PO BOX 163688, SACRAMENTO 95816	b.burg@comcast.net
✓ Sue Martensen	2220 Capitol Ave 95816	smartens@earthlink.net
✓ Karen Jacques	1209 T ST Sac 95811	threegables1819@gmail.com
✓ Lyman R Gray II	111 I STREET	lyman.gray@parks.ca.gov
✓ JJ Hurley	777 14th St, 3rd Fl Sac, CA 95817	jhurley@airquality.org
✓ Angela Tillotson	2110 Capitol Ave. #1	angie.tillotson@gmail.com



EIR Scoping Meeting: March 2, 2017

Sign-In Sheet

NAME	ADDRESS	EMAIL
GRETCHEN STEINBERG	4910 J. LAND PARK DR. SAC, CA 95822	Sacramento modern @ comcast.net
Veronica Bedy	2508 L Street #13 Sacramento CA 95816	veronica @ Sachousingalliance.org
MATTHEW Pinner	2514 CAPITOL Ave. 95816	pinner works @ sbcglobal.net
Vivian Gerlach	Live downtown & work	Vlgerlach @ Comcast.net
Julie Murphy	2731 6 St., Sac	marshall.newer @ gmail.com
JASON Kenney		Jason.Kenney @ dgs.ca.gov
Alan LoFaso		ALoFaso @ sbcglobal.net