

Fairgrounds Subdivision (P18-048)
Initial Study / Mitigated Negative Declaration
Comments and Responses
March 22, 2019

The Mitigated Negative Declaration for the Fairgrounds Subdivision Project (P18-048) was circulated for public comment from February 5, 2019 to February 25, 2019. Written comments were received as follows:

Date	Commenter
	Agencies
2/5/2019	PG&E
2/14/2019	Regional San
2/25/2019	SMAQMD
3/1/2019	Caltrans
	Individuals
2/9/2019	Luanne Stewart
2/12/2019	Baljit Dhesai
2/15/2019	Zach Miller
2/19/2019	Lindsey Johnson
2/25/2019	Joanna Wilson

Each of the written comments is attached.

Each of the comments addressed the project site and conditions as they relate to the particular areas of concern of the respective commenting agency, company, organization or individual. The comments are acknowledged by the City and have been considered as part of the project planning and its implementation.

None of the comments identified any new significant effect, increase in severity of an impact identified in the Mitigated Negative Declaration, or provided significant new information. Recirculation of the Mitigated Negative Declaration is not required.

The City of Sacramento Community Development Department, as lead agency, released the Fairgrounds Subdivision Project (P18-048) Initial Study / Mitigated Negative Declaration (IS/MND) for public review beginning on February 5, 2019 pursuant to CEQA Guidelines Section

15105. The IS/MND and supporting documents were made available at the City of Sacramento, Community Development Department, 300 Richards Boulevard, 3rd Floor, Sacramento, California. According to CEQA Guidelines Sections 15073 and 15074, the lead agency must consider the comments received during consultation and review periods together with the mitigated negative declaration.

The responses to comments are provided herein as Attachment 1. The comment letters are provided in Attachment 2. The written comments do not require changes in the analysis or conclusions of the MND and recirculation of the document is not required (CEQA Guidelines Section 15088).

Attachment 1

Pacific Gas and Electric, February 5, 2019

The Pacific Gas and Electric (PG&E) letter provides information regarding the application process for hooking up to PG&E gas and electric facilities and other development-related requirements. The comments are acknowledged and no further response is required.

Sacramento Regional County Sanitation District (Regional San), February 14, 2019

The letter from Regional San confirmed that sewer service for the project would be provided by the City's local sewer collection system and would be treated at the Sacramento Regional Wastewater Treatment Plant, as described on page 83 of the MND. The ultimate disposal of treated wastewater would be provided via Sump 2/2A and the Regional San City Interceptor System. Combined flows to the City Interceptor System are capped at 108.5 million gallons per day (mgd), per a 2013 Agreement between the City Regional San. The letter provides information and an overview of the treatment process, use of recycled water for irrigation in the City of Elk Grove and the NPDES Discharge permit requirements. The comment is acknowledged and no further response is required.

Sacramento Metropolitan Air Quality Management District, February 25, 2019

The letter from the Sacramento Metropolitan Air Quality Management District (SMAQMD) requests that an additional Basic Construction Emission Control Practice be included under Mitigation Measure AQ-1 on page 28 of the Initial Study. The letter also notes the project is subject to current SMAQMD rules at the time of construction and a list of current rules is attached to their letter. The following bullet is added under Mitigation Measure AQ-1 on page 28 and included in the Mitigation Monitoring and Reporting Plan (MMRP).

- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

California Department of Transportation, March 1, 2019

Comments received from Caltrans include a request to continue the sidewalks along Fairgrounds Drive to Broadway; install bike lanes on Broadway and around the project site; and reduce the headways (frequency) of Regional Transit buses along Broadway during the AM and PM peak hours.

Fairgrounds Drive wraps around the project site and connects to Broadway at two locations; 53rd Street and 56th Street. The stretch of Fairgrounds Drive along the west side of the project site includes sidewalks along both sides of the roadway from Broadway with the exception of along the project site frontage. Fairgrounds Drive along the east side of the project site also includes sidewalks from Broadway to the boundary of the project site. As shown on Figure 3 and discussed on page 10 of the MND, the project

includes installing sidewalks along the project frontage on Fairgrounds Drive to complete a pedestrian connection around the project site and within the project site that will allow pedestrian access to Broadway, as well as along roadways within the project site. Due to the residential nature of this project and the small number of vehicles estimated to use project roadways, class II striped bike lanes are not required. The City's Bikeway Master Plan (August 16, 2016) does not include adding class II striped bike lanes along this stretch of Broadway. Traffic analysis within the environmental document found that the proposed project would not adversely affect existing planned transit, bicycle or pedestrian facilities. The proposed project would not remove pedestrian or bicycle facilities or impede access to public transportation. No further response is required.

Luanne Stewart, February 9, 2019

The commenter owns a condominium in The Towers project and is raising a financial concern regarding the sale of the project site. CEQA does not require financial issues be evaluated; therefore, the comment is acknowledged and no further response is required.

Baljit Dhesi, February 12, 2019

The email from Baljit Dhesi is addressing the change in visual character of the site and refers to the site as a 'park' that provides a great visual and recreational amenity for the elderly residents that live in the adjacent senior housing development located south and east of the project site.

The City's existing Greenfair Park, located at 2950 57th Street is immediately adjacent to the Greenfair Tower II senior housing development along 57th Street. The project is not proposing removal of this small City-owned park. The tennis courts, pool and small lawn area that are part of the Greenfair Homeowners Association would also remain and are not part of this project.

As shown on Figure 2 in the MND, the project site includes the area that was previously developed with multi-family housing in the 1970s that were subsequently demolished in the early 1990s. As noted on page 21 of the MND, "[d]evelopment of the site with single-family residences and associated landscaping would change the existing character of the site, but due to its location surrounded by development in an urban area of the city the change in visual character would not be considered substantial. The proposed new development would complement existing landscaping and building sizes that currently exist in the vicinity. Therefore, the change in visual character would be considered a less-than-significant impact." The California Environmental Quality Act (CEQA) does not require that views of a project by a limited number of individuals constitute public views and are typically not evaluated under CEQA (see *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477). If an agency (or a local jurisdiction) does not include a policy that protects private views, then an evaluation of impacts to private views are not required under CEQA. The City's General Plan does not include any policies that require an evaluation of potential impacts associated with private views of a proposed project.

The project is proposing to remove existing trees that are unhealthy or pose a structural risk, but the project also includes planting a substantial number of new trees that would enhance the aesthetic character of the site. The project also includes new sidewalks along Fairgrounds Drive surrounding the project site, as well as internal to the project that will provide the ability for residents and neighbors to walk around the neighborhood. The comments are acknowledged and no further response is required.

Zach Miller (et al), February 15, 2019

The letter expresses opposition to amending the General Plan to change the land use designation from Traditional Neighborhood High Density (18-36 du/acre) to Traditional Neighborhood Low Density (3-8 du/acre) and urges the City to work with the applicant to design a project that supports more housing. The comments are acknowledged and no further response is required.

Lindsey Johnson, February 16, 2019

The email from Lindsey Johnson requests that 13 lots not be developed in order to provide more green space and areas for residents that live in the area to walk, specifically the senior citizens. As noted in the response above to Baljit Dhesi, the project is not proposing removal of Greenfair Park, located at 2950 57th Street, a small City-owned park. In addition, the tennis courts, pool and small lawn area that are part of the Greenfair Homeowners Association would also remain and are not part of this project. The project includes new, wider sidewalks and trees along Fairgrounds Drive surrounding the project site, as well as internal to the project that will provide areas for residents and neighbors to walk and exercise. The comment is acknowledged and no further response is required.

Joanna Wilson, February 25, 2019

The comment is requesting that the project include more green space and amenities for the neighbors that live in the area to enjoy walking and bicycling. As noted in prior responses above, the project includes new, wider sidewalks and trees along Fairgrounds Drive surrounding the project site, as well as internal to the project that will provide areas for residents and neighbors to walk and exercise. There are three public parks located within a half mile of the project site including a small City-owned park, Greenfair Park, located at 2950 57th Street southeast of the project site adjacent to Fairgrounds Drive/57th Street. This park contains a large grass lawn and mature trees, there are no other amenities provided. Other nearby City parks include Tahoe Park, a large park with a soccer field, basketball court, picnic areas, children's play areas, softball field, swimming and wading pool, and volleyball court, located approximately 0.5 mile southeast of the site, and Sierra Vista Park, located approximately 0.4 mile northwest of the site. The project applicant is required to pay the City's applicable in-lieu fees for parks and recreation facilities which could be used by the City to enhance parks in the neighborhood. The comment is acknowledged and no further response is required.

ATTACHMENT 2



February 5, 2019

Ron Bess
City of Sacramento
300 Richards Blvd. 3rd Floor
Sacramento, CA 95811

Ref: Gas and Electric Transmission and Distribution

Dear Mr. Bess,

Thank you for submitting NOA/NOI for the Fairgrounds Subdivision Project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page.
2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management



Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <http://usanorth811.org/wp-content/uploads/2017/05/CA-LAW-English.pdf>

1. **Standby Inspection:** A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.
2. **Access:** At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.
3. **Wheel Loads:** To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. **Grading:** PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.
5. **Excavating:** Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [$24/2 + 24 + 36/2 = 54$] away, or be entirely dug by hand.)



Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 12 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 12 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic protection system. Any proposed facilities, such as metal conduit, pipes,



service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.



Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as **"RESTRICTED USE AREA – NO BUILDING."**
2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&E's facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 15 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.
8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for



proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.



Main Office

10060 Goethe Road
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Treatment Plant

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Nicole Coleman
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www.regionalsan.com

February 14, 2019

Mr. Ron Bess
 City of Sacramento – Community Development Department
 300 Richards Boulevard, 3rd Floor
 Sacramento CA 95811

Subject: Notice of Availability/Intent to Adopt a Mitigated Negative Declaration for the Fairgrounds Subdivision Project (P18-048)

Dear Mr. Bess,

Sacramento Regional County Sanitation District (Regional San) has the following comments pertaining to the Notice of Availability of a Mitigated Negative Declaration for the Fairgrounds Subdivision Project (P18-048).

The proposed project is located at 325 Fairgrounds Drive and consists of redeveloping a portion of the Greenfair area and create 68 single-family homes on an 8.68-acre site.

Local sanitary sewer service for the proposed project site will be provided by the City of Sacramento's (City) local sewer collection system. Ultimate conveyance of wastewater from the City collection system 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 that wet and dry weather capacity limitations within Sump 2/2A and the City Interceptor are not exceeded.

On March 13, 2013, Regional San approved the Wastewater Operating Agreement between Regional San and the City. 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>

Customers receiving service from Regional San responsible for rates and fees outlined within the latest Regional San ordinance. Fees for connecting to the sewer system are set up to recover the capital investment of sewer treatment facilities that provides service to new customers. The Regional San ordinance is located on the Regional San website at:

<https://www.regionalsan.com/ordinance>.

Mr. Ron Bess
February 14, 2019
Page 2

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. Onsite and offsite impacts associated with constructing sanitary sewer facilities to provide service should be included in subsequent environmental impact reports.

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 for ammonia, nitrate, and pathogens. The new treatment facilities for achieving the permit requirements must be completed by May 2021 for ammonia and nitrate and May 2023 for the pathogen requirements. In April 2016 the Water Board adopted a new NPDES Discharge Permit that continued the more restrictive treatment levels and deadlines for new treatment facilities for ammonia, nitrate, and pathogens.

Regional San currently owns and operates a 5-mgd Water Reclamation that has been producing and providing Title 22 tertiary recycled water since 2003 to select areas within the SRWTP property and the City of Elk Grove. The recycled water used in the City of Elk Grove is wholesaled by Regional San to the Sacramento County Water Agency (SCWA). SCWA retails the recycled water, primarily for landscape irrigation use, to recycled water customers in the City of Elk Grove. Although Regional San has evaluated at a high level the feasibility of using recycled water in the Mather area, 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.

Mr. Ron Bess
February 14, 2019
Page 3

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

Sincerely,

Robb Armstrong

Robb Armstrong
Regional San Development Services & Plan Check



February 25, 2019

SENT VIA E-MAIL ONLY

Ron Bess, Assistant Planner
Community Development Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

**RE: Initial Study/Mitigated Negative Declaration - Fairgrounds Subdivision Project
(P18-048) (SAC201802036)**

Dear Mr. Bess:

Thank you for providing the Initial Study/Mitigated Negative Declaration for the Fairgrounds Subdivision Project to the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) for review. The proposed project consists of redeveloping a portion of the Greenfair area and developing 68 single-family homes. The project requires a General Plan Amendment from Traditional Neighborhood High Density to Traditional Neighborhood Low Density designation, with a rezone from the Multi-Unit Dwelling (R-3) zone to the Single-Unit or Duplex Dwelling Unit (R-1A) zone, and a Tentative Subdivision Map to create 68 parcels. Sac Metro Air District staff comments on the project follow.

Construction Emissions

Thank you for including the Sac Metro Air District's [Basic Construction Emission Control Practices](#) (BCECPs) in the project. Please include an additional BCECP that was missing from the list of practices to be implemented as Mitigation Measure AQ-1 on page 28:

- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

Construction

All projects are subject to Sac Metro Air District rules at the time of construction. Specific rules that may relate to construction activities are attached. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800.

Thank you for your consideration of these comments. If you have any questions, please contact me at 916-874-4816 or tduarte@airquality.org.

Sincerely,

A handwritten signature in blue ink that reads "Teri Duarte".

Teri Duarte, MPH

Mr. Ron Bess
February 14, 2019
Fairgrounds Subdivision IS/MND
Page 2

Planner/Analyst

Cc: Paul Philley, AICP, Sac Metro Air District

Attachment

Sac Metro Air District Rules & Regulations Statement (revised 6/2018)

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 (Sac Metro Air District):

All projects are subject to Sac Metro Air 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. 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 Sac Metro Air District prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the Sac Metro Air District 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 Sac Metro Air District 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.

Mr. Ron Bess
February 14, 2019
Fairgrounds Subdivision IS/MND
Page 4

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 the Sac Metro Air District 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 the Sac Metro Air District 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.

DEPARTMENT OF TRANSPORTATION**DISTRICT 3**

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MARYSVILLE, CA 95901

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*Making Conservation
a California Way of Life.*

March 1, 2019

GTS# 03-SAC-2019-00380

P18-077

Ron Bess
Assistant Planner
City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811.

Fairgrounds Subdivision Project – Mitigated Negative Declaration

Dear Mr. Bess:

Thank you for including California Department of Transportation (Caltrans) in the application review 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 mobility goals that support a vibrant economy and build communities.

The Fairgrounds Subdivision project (proposed project) proposes to redevelop a portion of the Greenfair area and create 68 single family homes. The proposed project includes amending the General Plan land use designation from Traditional Neighborhood High Density (18-36 du/ac) to Traditional Neighborhood Low Density (3-8 du/ac) and rezoning the site from Multi-Family Dwelling (R-3) to Single-Unit or Duplex Dwelling (R-1A). The project is requesting a tentative subdivision map to subdivide the 8.68-acre site into 68 single family lots with an average lot size of 3,552 square feet, along with internal roadways, sidewalks and landscaping located at 325 Fairground Drive. Based on the information provided, Caltrans provides the following comments:

Traffic Operations/Forecasting:

To reduce Vehicles Miles Traveled on the SHS Caltrans recommends the following:

- Continuity of sidewalks on Fairgrounds Drive and the proximity of the project to Broadway;
- Install bikes lanes on Broadway and around the project site; and

Ron Bess
City of Sacramento
March 1, 2019
Page 2

- Reduce the headway times for Sacramento Regional Transit routes on Broadway during the AM and PM peak periods.

Please provide our office with copies of any further actions regarding this project. We would 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 Uzma Rehman, Intergovernmental Review Coordinator for the City of Sacramento, by phone (530) 741-5173 or via email to uzma.rehman@dot.ca.gov.

Sincerely,



Alex Fong, Branch Chief
Office of Transportation Planning
Regional Planning Branch – South

February 8, 2019

Dear Mr. Bess:

I do not know if this is the proper place to restate my concerns, but here goes. I am a homeowner at the proposed building site on Fairgrounds Dr. I should profit from the sale of the land. I understand it is under contract to be purchased by a man named Jim Perley for considerably less than market value. He was not even the highest bidder for the property. Allegedly, our HOA board (5 of whom work for Jim Perley) turned down an offer from Engagement Architects that was \$400,000 higher than Mr. Perley's offer.

Mr. Perley owns the 200 or so condos known as The Towers and may receive most of his purchase price back. There are approximately 36 individually owned condos, and mine is one of the 36. The sale price might be divided between all homeowners, as was done in the past. Is it really legal for Mr. Perley to employ the majority, all but 2 in fact, of the homeowners board, have them accept an offer below market value and then possibly get almost all of his money back through the distribution of the sale?

The purchase contract reportedly happened 2 years ago. I believe the HOA was even paying the taxes on it until recently. We would like to see this property reappraised and truly put on the open market to be sold to the highest bidder.

Thank you for both your time and consideration.

Luanne Stewart
183 Fairgrounds Dr.
Sacramento, Ca 95817

Sent from my iPad

Ron Bess

From: Baljit Dhesi <dhesib209@gmail.com>
Sent: Tuesday, February 12, 2019 6:19 PM
To: Ron Bess
Subject: Written Comments for Fairgrounds Subdivision (P18-048)

Hi Ron Bess,

My name is Baljit Dhesi and I am one of the tenants of the area that is directly in view of the property area. I have reviewed the mitigated negative declaration that was posted. I have to say that in section 3.1 regarding Aesthetics. It will substantially degrade the existing visual character of the site. The park provides a great visual aesthetic and a great resource for the elderly tenants that live in the adjacent elderly home to allow for an area to walk and rest and exercise. It will affect the GOAL LU 2.3 as listed below as it is parkland. Please comment regarding this and any goals the city will have to mitigate this loss.

3.1 Aesthetics

	No additional significant effect	Additional significant effect can be mitigated to less than significant	Additional significant environmental effect; EIR will be prepared
I. AESTHETICS – Would the project...			
a) Create a source of glare that would cause a public hazard or annoyance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a new source of light that would be cast onto oncoming traffic or residential uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character of the site or its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Goal LU 2.3: City of Trees and Open Spaces: Maintain a multi-functional “green infrastructure” consisting of natural areas, open space, urban forest, and parkland, which serves as a defining physical feature of Sacramento, provides visitors and residents with access to open space and recreation, and is designed for environmental sustainability.

Sincerely,

Baljit Dhesi

February 15, 2019
Re: 325 Fairgrounds Drive
Plan #P18-048

Dear Mr. Norman,

We are writing to oppose amending the General Plan to lower the density requirements at 325 Fairgrounds Drive. This property is currently zoned R-3 and designated for Traditional Neighborhood High Density development. A rezone and General Plan amendment to allow for lower density residential development is inconsistent with the City's housing goals and an irresponsible decision during a housing shortage. A rezone and General Plan amendment sends the wrong message to the public and the development community that the City does not take seriously the need for more housing near jobs and transit. It would also exacerbate the effects of UC Davis's planned Aggie Square expansion, which is very near the property and is expected to impose even greater demand on the area's scarce housing supply. If the City is serious about addressing Aggie Square's impacts on our neighborhoods, it will preserve the zoning and land use designation of this nearly nine-acre infill development site.

We support a strong urban fabric in the Tahoe Park, Fairgrounds, Elmhurst and Med Center neighborhoods. This property is currently designated for Traditional Neighborhood High Density development, which requires at least 18 dwelling units per acre and buildings with heights of no more than three stories. This is an appropriate density for such a central location that is within walking distance to UC Davis Medical Center and the planned Aggie Square. The property is close to light rail and a bus route with downtown service that RT is currently proposing to increase. Lowering the density requirements of transit-oriented properties is at odds with the intent of the recently-adopted TOD ordinance and the City's transportation goals. It will ultimately lead to more traffic on our streets, not less.

A significant portion of the community supports additional housing in the Tahoe Park and Elmhurst neighborhoods. The Tahoe Park Neighborhood Association submitted a comment letter dated July 25, 2018 in support of the project, citing the need for more housing. In a housing shortage, it can be tempting to approve any housing development proposals that come the City's way, but poor policy decisions will not resolve the crisis. Amending the General Plan to construct fewer homes close to jobs and transit is a bad policy, especially during a housing shortage and particularly when UC Davis is expanding its footprint in our neighborhoods. We encourage the City to work with the applicant to develop a more appropriate vision for this important site.

Sincerely,

Zach Miller, Tahoe Park
Kirsten Pringle, Tahoe Park
Don Meyers, Tahoe Park
Julia Scher, Tahoe Park
Rose Cabral, Tahoe Park
The Spich Family, Elmhurst
Amanda Palumbo, Elmhurst
Kevin Dumler and Elliott Froissart, House Sacramento
Alex Kelter, MD and Robert Meagher, MD, co-chairs, Environmental Council of Sacramento (ECOS) Land Use Committee.

CC: Vice Mayor Eric Guerra; UC Davis Assistant Vice Chancellor Robert Segar

Ron Bess

From: Lindsay Roach <lindsay.roach17@gmail.com>
Sent: Saturday, February 16, 2019 9:19 AM
To: Ron Bess
Subject: Comment Re: FAIRGROUNDS SUBDIVISION PROJECT [P18-048]

Good morning Mr. Bess,

My name is Lindsay Johnson, I am a resident of The Grounds at Tahoe Park subdivision, a Health Economist and, *I think*, a good neighbor. I moved into to my new home in July of 2018. I came from east sac and admittedly was not too familiar with my new neighborhood. But in the last 8 months I have taken the time to get to know my surroundings, my new neighbors, and all of the people who know, love and use the old fairgrounds.

Let me ease your nerves early, I am not suggesting that the new subdivision that is set to transform the old fairgrounds into new homes not go forward; I am not supportive of it as it stands, but with one change I could get behind it.

As you know, the old fairgrounds are surrounded by affordable housing for seniors. Directly south of the green space is a high rise for seniors, and down the street on Broadway just a few more feet is more senior living.

Believe me when I tell you that all day, every day the old fairgrounds are filled with seniors walking, doing aerobics, soaking up the sun and watching the birds and squirrels.

This green space is their only accessible source of outdoor space. If this is taken away they will not have an area to exercise or get fresh air and vitamin D. The majority of them aren't able to drive. Although Tahoe park is only a mile away, they wont be able to get there, and Broadway is a busy road and not safe for someone who is unsteady on their feet to walk.

With the amount of activity that I have witnessed in this park from our senior community, I know that subdividing the vast majority of this space will effect them significantly.

As a health economist, I know how important social determinants of health are. Without a doubt, access to this park and the exercise it is allowing these seniors to get is preserving their health, and without it we would see their health decline.

Due to this area being of high use to such a sensitive population, I would like to propose that plots 33-37 and 42-49 not be developed into homes and be left as greenspace, with a path added around it so that the seniors still have a place to get outside and exercise.

I truly hope that you will consider this new plan and support the preservation of a small but dear part of our neighborhood.

I hope to hear back from you.

Thank you for your consideration,
Lindsay Johnson
(707)292-8636

Ron Bess

From: Joanna Wilson <joannatwilson@gmail.com>
Sent: Monday, February 25, 2019 1:50 PM
To: Ron Bess
Subject: FAIRGROUNDS SUBDIVISION PROJECT [P18-048]

Dear Mr. Bess,

After reviewing the Draft Mitigated Negative Declaration the Fairgrounds Subdivision [P18-048], I would like to emphasize the need for green space in the proposed housing division area. As a resident of The Grounds subdivision, I can say that the green space provided by the current park is an integral area of this community - residents of the adjacent single family and multi-family homes use this space daily. At any given time you would be hard pressed to not see seniors walking the winding pathways and full perimeter of Fairgrounds Drive, joggers, families walking, owners out walking their dogs, and children and adults riding bikes, in the green space and walkways throughout.

From The Grounds specifically, this plan moves access to the green space 3-4 blocks away without an easy access point.

While I support the proposed homes being built in our sought-after neighborhood, I feel you are remiss in not leaving or including green space in the plan for this new development. As you finalize the plans, I urge you to include green space to allow our entire neighborhood to enjoy the activities listed above. A green median (similar to Elmhurst/T St), pathways with parklets/grass areas throughout flanked by sidewalks accessible by foot from the Greenfair Towers, the Grounds, and all existing (and proposed) housing on Fairgrounds Dr. would suffice.

Please do not take away our access to green space - exploring outdoors, mature trees, winding walkways create a unique camaraderie and experience in the Fairgrounds neighborhood; It would be shameful to lose it.

Thank you,
Joanna Wilson