Natomas Crossing
Project# P04-264
State Clearing House # 2007112088

Final
Environmental Impact Report

Prepared For The
City of Sacramento

June 2009

Prepared By
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1501 Sports Drive, Sacramento, CA 95834
FINAL
ENVIRONMENTAL IMPACT REPORT
Natomas Crossing Project (P04-264)

State Clearing House # 2007112088

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June 2009
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1. INTRODUCTION AND LIST OF COMMENTERS
INTRODUCTION AND LIST OF COMMENTERS

1.0 INTRODUCTION

This Final Environmental Impact Report (FEIR) contains public and agency comments received during the public review period of the Natomas Crossing Draft Environmental Impact Report (DEIR). This document has been prepared by the City of Sacramento, as lead agency, in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines Section 15132. The Introduction and List of Commenters chapter of the FEIR discusses the background of the DEIR, the organization of the FEIR, and lists the comment letters received.

1.1 BACKGROUND

The Natomas Crossing DEIR contains the following environmental analysis chapters:

- Land Use;
- Transportation and Circulation;
- Noise;
- Air Quality;
- Hydrology, Water Quality, and Drainage;
- Hazards;
- Aesthetics; and
- Public Services.

The City of Sacramento used the following methods to solicit public input on the DEIR: the distribution of a Notice of Preparation (NOP) on November 19, 2007 for a 30-day review ending December 18, 2007 for a previous version of the Natomas Crossing project, which included only Quadrant C and the southern portion of Quadrant B; the distribution of a revised NOP on November 26, 2008 for a 30-day public review period ending December 29, 2008 to include the northern portion of Quadrant B and Quadrant D in the analysis; and the distribution of the DEIR for a 45-day comment period from April 9 to May 26, 2009. The DEIR was distributed to applicable public agencies, responsible agencies, and interested individuals. Copies of the document were made available at the public counter of the Community Development Department (formerly known as the Development Services Department), located at 300 Richards Boulevard, Sacramento, California.

1.2 ORGANIZATION OF THE FINAL EIR

The FEIR is organized into the following chapters:
1. Introduction and List of Commenters
Chapter 1 provides an introduction and overview of the document, describing the background and organization of the FEIR. Chapter 1 also provides a list of commenters who submitted letters in response to the DEIR.

2. Revisions to the DEIR Text
Chapter 2 provides a summary of any changes made to the DEIR text in response to comment letters. These changes do not change the intent or content of the analysis or the effectiveness of mitigation measures.

3. Comments and Responses
Chapter 3 presents all of the comment letters received, and responses to each comment. Each comment letter has been numbered at the top and then bracketed to indicate how the letter has been divided into individual comments, and each comment has been given a number. For reference, each number begins with the number of the letter, followed by the comment number. For example, the second comment in Letter 1 would have the following format: 1-2.

4. Mitigation Monitoring Plan
The Mitigation Monitoring Plan in Chapter 4 includes a description of the requirements of the California Environmental Quality Act. The intent of the Mitigation Monitoring Plan is to prescribe and enforce the proper and successful implementation of the mitigation measures as identified within the Environmental Impact Report for this project.

1.3 List of Commenters

The following comment letters were received during the comment period for the Natomas Crossing Project DEIR:

Letter 1 .......................................................................................... Richard Pan, Resident
Letter 2 ......................................................................................... Rebecca Hipolito, Resident
Letter 3 .................. Kim A. Schwab, California Regional Water Quality Control Board
Letter 4 .................................. Salam Khan, P.E., Sacramento Area Sewer District
Letter 5 .................... Kamal Atwal, Sacramento County, Department of Transportation
Letter 6 ..................... Alyssa Begley, California Department of Transportation
Letter 7 ..................................................... Chris Holm, WALKSacramento
Letter 8 ............ Terry Roberts, Office of Planning and Research, State Clearinghouse
1.4 Recirculation

CEQA requires recirculation of an EIR when significant new information is added to the EIR after public notice is given of the availability of the DEIR for public review, but before certification (CEQA Guidelines Section 15088.5). New information is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (CEQA Guidelines Section 15088.5).

Because this FEIR does not identify any new significant environmental impacts, or a substantial increase in the severity of an environmental impact, this FEIR does not contain “significant new information,” and recirculation of the DEIR is not required prior to approval.
2. REVISIONS TO THE DEIR TEXT
2.0 INTRODUCTION

This chapter presents all of the revisions made to the DEIR in response to comments received. It should be noted that the following revisions do not change the intent or content of the analysis or effectiveness of mitigation measures presented in the DEIR.

2.1 DESCRIPTION OF CHANGES

New text is double "underlined", and deleted text is "struck through". Text changes are presented in the page order in which they appear in the DEIR.

Since the release of the DEIR, the City of Sacramento Development Services Department has been renamed “Community Development Department.” Therefore, for clarification purposes, all references in the DEIR to the “Development Services Department” are hereby replaced with “Community Development Department.” The following pages of the DEIR are hereby amended: 1-4, 1-8, 2-20, 2-21, 2-26, 2-31, 2-36, 4.0-9, 4.3-16, 4.3-19, 4.3-27, 4.4-26, 4.4-33, 5-2.

4.0 Introduction to the Analysis

For clarification purposes, the first paragraph on page 4.0-6 of the DEIR is hereby revised to read:

_Sewer Facilities_

Sewer service within the vicinity of the project site is provided by the Sacramento Area Sewer District (SASD) and the Sacramento Regional County Sanitation District (SRCSD). The project would be directly served by the SASD, which is responsible for all collector and trunk sewer lines. Sewer flows collected by these collector/trunk lines are then discharged into SRCSD interceptor lines, which ultimately bring the sewer to the regional treatment plant. A Revised Master Sewer Study was prepared in May 2002 for Natomas Crossing Area 3, within which the project site is located. The Sacramento County SASD design criteria used in the Master Sewer Study assumed flow rates for Quadrants B, C, and D equivalent to office/commercial/industrial uses. The SRCSD has indicated that the land uses proposed for the Natomas Crossing project do not change the flow rates assumed for the site in the 2002 sewer study. Therefore, adequate sewer treatment capacity exists to serve the project and impacts would be less than significant.
3. RESPONSES TO COMMENTS
The Responses to Comments chapter includes responses to each of the comment letters submitted regarding the Natomas Crossing DEIR. Each bracketed comment letter is followed by numbered responses to each bracketed comment.

The DEIR comment letters received during the public comment period for the Natomas Crossing Project DEIR are responded to in the following order:

Letter 1 ......................................................................................... Richard Pan, Resident
Letter 2 .................................................................................... Rebecca Hipolito, Resident
Letter 3 ............. Kim A. Schwab, California Regional Water Quality Control Board
Letter 4 .................................. Salam Khan, P.E., Sacramento Area Sewer District
Letter 5 ................... Kamal Atwal, Sacramento County, Department of Transportation
Letter 6 ..................... Alyssa Begley, California Department of Transportation
Letter 7 .......................................................... Chris Holm, WALKSacramento
Letter 8 ............ Terry Roberts, Office of Planning and Research, State Clearinghouse
Dear Mr. Buford:

I was reviewing the Natomas Crossing EIR, and I was struck by the lack of information about the planned development of Quadrant B regarding the zoning change for the southern portion from EC-40 and EC-50 to shopping center. This is in sharp contrast to the information in the EIR for rezoning Quadrant C to include more retail which contains maps, drawings, and artist renditions and for Quadrant D, which will be unchanged. While the developers state they do not plan to develop quadrant B at this time, all development is being halted due to insufficient flood control.

I would be strongly opposed to rezoning Quadrant B to shopping center until sufficient data is provided regarding its planned use in the EIR.

I would also note that while the developers claim the number of jobs will not change with their proposal, the average income and benefits of employees in retail is lower than that of office workers, which has an economic impact on the neighborhood and city. The city should continue to seek employers that provide better jobs with adequate benefits for this important transportation corridor which is located between downtown and the airport. Excessive retail may lead to increased blight in the future due to a decline in local residential neighborhoods.

Richard Pan
1778 Ilasa Ave, Sacramento, CA 95835
916-705-8596

http://windowslive.com/explore?ocid=TXT_TAGLM WL_allup_1a_explore_042009
LETTER 1: Richard Pan, Resident

Response to Comment 1-1

It is important to note that only the southern portion of Quadrant B would be rezoned to shopping center as part of the proposed project’s entitlements (see Table 3-2 on page 3-17 of the Project Description chapter of the DEIR); the existing EC-50 zoning designation for the northern portion of Quadrant B would remain unchanged. As stated on page 4.1-18 of the DEIR, the project includes a request to amend some of the site’s zoning designations to make the proposed project consistent with the 2030 General Plan:

Some elements of the proposed project are inconsistent with the Employment Center zoning designation(s) of the project site. The project applicant has therefore requested that the project site be appropriately rezoned. To accommodate the proposed regional commercial center, the applicant is requesting that 83.4 acres of the project site in Quadrants B and C be rezoned to Shopping Center (SC) (74.7), and 8.7 acres in Quadrant C zoned from EC-40 to EC-50, and 36.4 acres in Quadrant D from EC-40 to EC-50. The proposed zoning changes would bring the project into consistency with the 2030 General Plan designation and anticipated commercial uses of the project.

Quadrant B will not be developed at this time and additional entitlements would need to be secured for the development of the regional commercial center uses on the southern portion of Quadrant B. The Draft EIR therefore evaluates development of Quadrant B at a programmatic, rather than project level. Without the rezone of the southern portion of Quadrant B, the project would not be consistent with the 2030 General Plan.

Response to Comment 1-2

The comment does not address the adequacy of the DEIR, but is provided to the decision-makers for their consideration.
From: rebecca hipolito <rebeccageekmo@yahoo.com>
To: <TBuford@cityofsacramento.org>
Date: 4/18/2009 3:51 PM
Subject: Environmental Impact -Natomas Crossing Project.

Dear Mr. Buford,

I strongly object to more building in Natomas when we have so many empty offices already. We are in a depression, and cannot afford to damage more of the environment.

Thank you for your kind attention.

Rebecca Hipolito
4000 Alan Shepard st #134
Sacramento, Calif 95834
916-574-9401
LETTER 2: REBECCA HIPOLITO, RESIDENT

Response to Comment 2-1

The comment does not address the adequacy of the DEIR, but is provided to the decision-makers for their consideration.
24 April 2009

Tom Buford
City of Sacramento Planning Division
300 Richards Boulevard
Sacramento, CA 95811

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE NATOMAS CROSSING,
SCH# 2007112088, CITY OF SACRAMENTO, SACRAMENTO COUNTY

As a Responsible Agency under CEQA, we have reviewed and commented on the Natomas Cross Draft EIR located in the City of Sacramento. The City of Sacramento is regulated by the Regional Water Board under Waste Discharge Requirements Order No. R5-2008-0142, NPDES NO. CAS082597 for County of Sacramento and Cities of Citrus Heights, Elk Grove, Folsom, Galt, and Sacramento Storm Water Discharges from Municipal Separate Storm Sewer Systems (MS4), dated 11 September 2008 (hereafter Sacramento MS4).

The project site is located between Interstate 5 and East Commerce Way, with 86.8 net acres north of Arena Boulevard (referred to as Quadrant B), and 83.6 net acres south of Arena Boulevard (referred to as Quadrant C (47.2 net acres) and Quadrant D (36.4 net acres)) for a total of 150.4 net acres in the North Natomas area of the City of Sacramento. The project site comprises the majority of the Natomas Crossing – Alleghany Area #3 PUD, which consists of Quadrants A-D. The project encompasses 74.9 gross acres for Quadrant B, 52.9 gross acres for Quadrant C, and 39.8 gross acres for Quadrant D for a total of 167.8 gross acres. Quadrant A has already been largely developed and is not part of this project.

All drainage ultimately flows to the American and Sacramento rivers. Stormwater runoff is collected in City drainage facilities and is sent directly to the Sacramento River. Reaches of the Sacramento River flow through the Sacramento urban area that are considered impaired and listed on the Clean Water Act (CWA) Section 303(d) list of impaired and threatened waters for California. Section 303(d) establishes the total maximum daily load (TMDL) process to assist in guiding the application of state water quality standards, requiring the states to identify streams in which water quality is impaired (affected by the presence of pollutants or contaminants) and to establish the TMDL or the maximum quantity of a particular contaminant that a water body can assimilate without experiencing adverse effects.

We have focused our comments on Section 4.5 HYDROLOGY, WATER QUALITY, AND DRAINAGE.
Comment

On page 4.5-11 it states, in part: “Controlling urban runoff pollution during and after construction is critical to the success of the Sacramento Comprehensive Stormwater Management Program. The New Development Management Program (NDMP) is an element of the Comprehensive Stormwater Management Program being implemented by the City to specifically control post-construction urban runoff pollutants from new development or redeveloped areas. The goal of the NDMP is to minimize runoff pollution typically caused by land development and to protect the beneficial uses of receiving waters by employing a sensible combination of pollutant source control and site-specific treatment control measures.”

On page 4.5-17, under City of Sacramento General Plan goals and policies, 4.5-2 Project Impacts to existing drainage facilities. In summary, the DEIR discusses the existing stormwater channels, pipes, drain lines, and Detention Basins. It states, in part: “The City of Sacramento’s existing drainage facilities for the larger drainage basin have also been designed with sufficient capacity to serve this project. Local drainage associated with the project would tie into an existing system with 100 percent of the downstream improvements in place and sized for the proposed project. Additional off-site infrastructure is not required.”

On page 4.5-13, under City of Sacramento General Plan goals and policies, Environmental Resources, it states in part:

“ER 1.1.4 New Development. The City shall require new development to protect the quality of water bodies and natural drainage systems through site design, storm water treatment, and best management practices (BMPs) consistent with the city’s NPDES Permit.

ER 1.1.5 Post-Development Runoff. The City shall impose requirements to control post-development peak storm water runoff discharge rates and velocities to prevent or reduce downstream erosion and protect stream habitat.”

On page 4.5-20, Project Impacts and Mitigation Measures; 4.5-4 Operational water quality degradation associated with urban runoff from the project site, it states in part:

“The increased impervious area created by the development of the proposed project would alter the types and levels of pollutants that could be present in project site runoff. Runoff from streets, driveways, parking lots, and landscaped areas typically contains nonpoint source pollutants such as oil, grease, heavy metals, pesticides, herbicides, fertilizers, and sediment.”

The DEIR continues to state, in part: “The existing downstream drainage system, including Drainage Basin No. 16B, is designed to control urban runoff pollutants and improve water quality by allowing pollutants to settle out within the detention basin. Furthermore, the applicant will comply with the City’s Stormwater Management and Discharge Control Ordinance (Title 13). This ordinance requires that the Improvement Plans incorporate controls to minimize the on-going, post construction discharge of stormwater pollutants from the project. The project would include onsite source and treatment controls as required by the Stormwater Quality Standards for Development Projects to ensure that stormwater runoff meets the water quality standards identified by the RWQCB for water entering the Sacramento
Letter 3
Cont’d.

River. (Endnote 7) Therefore, the potential for adverse impacts from urban runoff generated by the proposed project would be considered less than significant.


Mitigation Measure(s)
None required.

Response

The terms low impact development, green growth or hydromodification management are not discussed in this document to address the U.S. EPA’s policy, State Water Board’s policy, or the minimum requirements of the Sacramento MS4 permit to meet the maximum extent practicable (MEP) standard.

Even though references are made to the City’s Stormwater Management and Discharge Control Ordinance (Title 13) and the *Stormwater Quality Design Manual for the Sacramento and South Placer Regions, May 2007*, the DEIR focuses on the use of existing drainage channels/canals, levees, subsurface drains, pumping stations and Detention Basins to mitigate storm water quantity and quality. All drainage ultimately flows to the American and Sacramento rivers.

We want to iterate the required aspects of the Sacramento MS4 permit as it applies to water quantity and quality for this proposed project. The Sacramento MS4 permit requires:

“Provision D. 15. Water Quality Planning and Design Principles - In order to reduce pollutants and runoff flows from new development and redevelopment to the MEP (maximum extent practicable), each Permittee shall address the following concepts:

a. Each Permittee shall incorporate water quality and watershed protection principles into planning procedures and policies or requirements to direct land-use decisions and require implementation of consistent water quality protection measures for priority development projects. These principles and policies shall be designed to protect natural water bodies and shall consider, at a minimum, the following:

i. Minimize the amount of impervious surfaces and directly connected impervious surfaces in areas of new development and redevelopment to maximize on-site infiltration of runoff (low impact design practices).

ii. Implement pollution prevention methods supplemented by pollutant source controls and treatment. Use strategies that control the sources of pollutants or constituents (i.e., the point where water initially meets the ground) to minimize the transport of urban runoff and pollutants offsite and into MS4s.
Letter 3

Cont’d.

iii. Preserve, create or restore areas that provide important water quality benefits, such as riparian corridors, wetlands, and buffer zones (e.g., levees).

iv. Limit disturbances of natural water bodies and natural drainage systems caused by development including roads, highways, and bridges.

v. Require incorporation of structural and non-structural BMPs to mitigate the projected increases in pollutant loads from future development.

vi. Identify and avoid development in areas that are particularly susceptible to erosion and sediment loss, or establish development guidance that protects areas from erosion and sediment loss.

vii. Coordinate with local traffic management programs to reduce pollutants associated with vehicles and increased traffic resulting from development.

viii. Implement source and/or treatment controls to protect downstream receiving water quality from increased pollutant loads in runoff flows from new development and significant redevelopment.

ix. Control the post-development peak storm water runoff discharge rates and velocities to prevent or reduce downstream erosion and to protect stream habitat (hydromodification concepts).

b. Low Impact Development Strategies: Priority new development and redevelopment projects shall integrate Low Impact Development (LID) principles as feasible early in the project planning and design process. LID is a storm water management and land development strategy that emphasizes conservation and the use of existing natural site features integrated with engineered, small-scale hydrologic controls to more closely reflect predevelopment hydrologic functions in residential, commercial, and industrial settings. When developing the LID Program the Permittees shall consider and incorporate all appropriate and applicable LID components and measures that have been successfully and effectively implemented in other municipal areas. Other programs include, but are not limited to, USEPA’s “Managing Wet Weather with Green Infrastructure, Action Strategy, 2008” and LID program elements specified in the permits or Storm Water Management Plans of other MS4s throughout the state.

The Stormwater Quality Design Manual for Sacramento and South Placer Regions (May 2007) currently promotes LID principles such as conservation and use of natural site features; site specific, lot scale source and treatment control measures that keep pollutants from contacting run-off and leaving the site; and run-off reduction control measures integrated into site design.”
In order to reduce pollutants and runoff flows from new development and redevelopment to the MEP, the City of Sacramento is required to ensure that all feasible BMPs are considered. The MEP standard involves applying best management practices (BMPs) that are effective in reducing the discharge of pollutants in storm water runoff. In discussing the MEP standard, the State Water Board has said the following: "There must be a serious attempt to comply, and practical solutions may not be lightly rejected. If, from the list of BMPs, a permittee chooses only a few of the least expensive methods, it is likely that MEP has not been met. On the other hand, if a developer employs all applicable BMPs accept those where it can show that they are not technically feasible in the locality, or whose cost would exceed any benefit to be derived, it would have met the standard. MEP requires developers to choose effective BMPs, and to reject applicable BMPs only where other effective BMPs will serve the same purpose, the BMPs would not be technically feasible, or the cost would be prohibitive." (Order No. WQ 2000-11, at p.20.). MEP is the result of the cumulative effect of implementing, continuously evaluating, and making corresponding changes to a variety of technically and economically feasible BMPs that ensure the most appropriate controls are implemented in the most effective manner. This process of implementing, evaluating, revising, or adding new BMPs is commonly referred to as the iterative approach.

The Sacramento MS4 requires the City of Sacramento to follow this iterative process early in the planning stages (i.e., pre-application review meeting) of new development and redevelopment projects in their jurisdiction.

If you have any questions, please contact me at 916.464.4606 or email address kschwab@waterboards.ca.gov.

Kim A. Schwab, P.G.
Engineering Geologist
Storm Water Section

cc: State Clearing House
    Sherill Huyn, City of Sacramento Storm Water Coordinator, Sacramento
    Alleghany Properties LLC, 2150 River Plaza Drive, Suite 155, Sacramento, CA 95833
    Raney Planning & Management, Inc., 1501 Sports Drive, Sacramento, CA 95834
Response to Comment 3-1

The comment summarizes the conclusions of the DEIR and does not address the adequacy of the analysis in the DEIR. No further response is required.

Response to Comment 3-2

As stated in the Existing Environmental Setting discussion on pages 4.5-10 and 4.5-11 of the DEIR:

The City of Sacramento has received a municipal National Pollutant Discharge Elimination System (NPDES) permit from the CVRWQCB. Under this permit, the Permittees are required to develop, administer, implement, and enforce a Comprehensive Stormwater Management Program (CSWMP) in order to reduce pollutants in urban runoff to the Maximum Extent Practicable. The CSWMP emphasizes all aspects of pollution control, including, but not limited to, public awareness and participation, source control, regulatory restrictions, water quality monitoring, and treatment control.

Controlling urban runoff pollution during and after construction is critical to the success of the Sacramento Comprehensive Stormwater Management Program. The New Development Management Program (NDMP) is an element of the Comprehensive Stormwater Management Program being implemented by the City to specifically control post-construction urban runoff pollutants from new development or redeveloped areas. The goal of the NDMP is to minimize runoff pollution typically caused by land development and to protect the beneficial uses of receiving waters by employing a sensible combination of pollutant source control and site-specific treatment control measures.

The comment reiterates the requirements in the current Sacramento MS4 NPDES permit. The City of Sacramento has already prepared and submitted the Stormwater Quality Improvement Plan (SQIP) to address all the requirements in the permit, which is currently being reviewed by the Regional Board.

In terms of Low Impact Development (LID), Provision D15b of the Sacramento’s MS4 NPDES permit specifies that each Permittee must require LID controls for priority new and redevelopment projects (currently LID is optional). However, the same permit provision (D15bi) also provides time for the permittees to “amend, revise or adopt quantitative and qualitative development standards …to require implementation of LID strategies …no later than six months after approval of the HMP by the Regional Water Board.”

Development projects permitted by the regulatory agencies (Army Corps, Fish and Wildlife, Regional Water Board, etc.) and approved by the City before the HMP and LID standards are officially established would not be subject to such standards.
The project is required to comply with the requirements of the City’s NPDES permit and the Comprehensive Stormwater Management Program; the commenter’s concerns regarding the project complying with the minimum requirements of the Sacramento MS4 permit have been addressed.

**Response to Comment 3-3**

The comment describes the Sacramento MS4 permit discussed in Response to Comment 3-2; however, the comment does not address the adequacy of the DEIR. No further response is required.

**Response to Comment 3-4**

The City of Sacramento has already ensured that the effective BMPs have been chosen through the City of Sacramento Stormwater Management Program, as stated in the DEIR on pages 4.5-14 and 4.5-15:

The City of Sacramento Stormwater Management Program is a comprehensive program comprising various program elements and activities designed to reduce stormwater pollution to the maximum extent practicable and eliminate prohibited non-stormwater discharges in accordance with federal and State laws and regulations. These laws and regulations are implemented through NPDES municipal stormwater discharge permits. An element of the program, the Construction Element (CE), was designed to reduce the discharge of stormwater pollutants to the maximum extent practicable by requiring construction sites to reduce sediment in site runoff and reduce other pollutants such as litter and concrete wastes through good housekeeping procedures and proper waste management. The CE strategy includes the following components:

- Ensure each grading permit or Improvement Plan includes an erosion and sediment control plan detailing erosion, sediment, and pollution control measures to be used during construction of the project.
- Ensure applicable projects obtain a State General Construction Permit and prepare a SWPPP.
- Inspect and enforce the project’s erosion and sediment control plan, the Grading, Erosion, and Sediment Control Ordinance, and the Stormwater Discharge Control Ordinance.

Another element of the program, the New Development Element (NDE), was designed to specifically control post-construction urban runoff pollutants from new development or redeveloped areas. The NDE strategy for reducing stormwater pollutants from new development includes the following:

- Employing applicable source controls on all projects;
- Employing regional water quality treatment control measures, such as water quality detention basins, for areas of large development (i.e., areas generally greater than 20 acres), where the opportunity exists; and
• Employing on-site treatment control measures for commercial, industrial, and multifamily residential land uses of one acre or more in areas not served by regional water quality control measures.

As indicated in the DEIR, because the project would be required to comply with the City of Sacramento Stormwater Management Program, which includes the most effective BMPs for development projects to meet the MEP standards, the commenter’s concerns regarding use of feasible BMPs have been addressed.

**Response to Comment 3-5**

See Response to Comment 3-2.
May 1, 2009
E225,000

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

Subject: Notice of a Availability of a Draft Environmental Impact Report for the Natomas Crossing Project

Dear Mr. Buford:

Both the Sacramento Area Sewer District (District) and the Sacramento Regional County Sanitation District (SRCSD) reviewed the subject documents and have the following comments.

The project site comprises the majority of Natomas Crossing – Alleghany Area #3 PUD, which consists of Quadrant A-D. Quadrant B consist of 66.8 acres divided as the following: 10 acres of Residential, 5 acres of Hotel, 14 acres of Office. Quadrant C consists of 47.2 net acres for both retail and office development. Quadrant D includes the future development of approximately 600,000 square feet for a hospital and an additional 600,000 square feet for medical office uses. The project is located between Interstate 5 and East Commerce Way in the North Natomas area of the City of Sacramento.

The District does not have any specific concerns. We expect that if the project is subject to currently established policies, ordinances, fees, and to conditions of approval that we will propose after review of entitlement application documents, then mitigation measures within the EIR will adequately address the sewage aspects of the project and we anticipate a less than significant impact to the sewage facilities.

However, the District is requesting to revise Paragraph 1 in Chapter 4 (Page 4.0-6) to reflect the correct source of design criteria used in the Master Sewer Study as Sacramento Area Sewer District, not the County design criteria.

Sewer for this project will directly be served by the Sacramento Area Sewer District, which is responsible for all collector and trunk sewer lines.
Sewer flows collected by these collector/trunk lines are then discharged into SRCSD interceptor lines, which ultimately bring the sewer to the regional treatment plant.

If you have any questions regarding these comments, please call Amandeep Singh at (916) 876-6296 or myself at (916) 876-6094.

Sincerely,

Salam Khan, P.E.
Sacramento Area Sewer District
Development Services

SK/CJ: ms

cc: File
Response to Comment 4-1

This comment, which is an introductory comment that summarizes the description of the proposed project, does not address the adequacy of the DEIR. No further response is required.

Response to Comment 4-2

This comment does not address the adequacy of the DEIR. No further response is required.

Response to Comment 4-3

Comment noted. Based on Comment 4-3, page 4.0-6 of the DEIR is hereby revised as follows:

Sewer Facilities

Sewer service within the vicinity of the project site is provided by the Sacramento Area Sewer District (SASD) and the Sacramento Regional County Sanitation District (SRCSD). The project would be directly served by the SASD, which is responsible for all collector and trunk sewer lines. Sewer flows collected by these collector/trunk lines are then discharged into SRCSD interceptor lines, which ultimately bring the sewer to the regional treatment plant. A Revised Master Sewer Study was prepared in May 2002 for Natomas Crossing Area 3, within which the project site is located. The Sacramento County SASD design criteria used in the Master Sewer Study assumed flow rates for Quadrants B, C, and D equivalent to office/commercial/industrial uses. The SCRCSD has indicated that the land uses proposed for the Natomas Crossing project do not change the flow rates assumed for the site in the 2002 sewer study. Therefore, adequate sewer treatment capacity exists to serve the project and impacts would be less than significant.

The above revision is for clarification purposes, and does not change the analysis or conclusions of the DEIR.
Letter 5

County of Sacramento

May 20, 2009

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

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT
(DEIR) FOR THE NATOMAS CROSSING PROJECT

Dear Mr. Buford:

The Sacramento County Department of Transportation appreciates the opportunity to review the
DEIR for the Natomas Crossing project. We have previously submitted two comment letters for
this project and they are still valid. I have attached copies of both letters for your reference.

The Department of Transportation is concerned that our comments made during the
“Project Notification” and the “Notice of Preparation” stages were not addressed in the
DEIR. Please analyze the potential significant impacts of the project on the county
roadway facilities as mentioned previously in our comment letters. We would like to have
responses to our previous comments and updated traffic impact analysis to support the
conclusions of the DEIR.

If you have any questions please call me at 875-2844.

Sincerely,

Kamal Atwal
Associate Transportation Engineer

“Leading the Way to Greater Mobility”
Ms. Jennifer Hageman  
City of Sacramento  
Development Services Department  
300 Richards Boulevard  
Sacramento, CA 95811

SUBJECT: Notice of Preparation (2nd) for and Environmental Impact Report (EIR) for the Natomas Crossing Project

Dear Ms. Hageman:

The Sacramento County Department of Transportation appreciates the opportunity to review the NOP for the Natomas Crossing project. Our original comment letter dated August 14, 2007 is still valid. I have attached it for reference.

I would also further add that the Department of Transportation is concerned that the traffic increase from continuing growth in the Natomas area has had negative impacts on traffic conditions on El Centro Road. The environmental document for this project should also discuss the acceleration of needed improvements to sub-standard conditions on El Centro Road. The environmental document should also identify funding for all necessary improvements.

If you have any questions please call me at 874-7052.

Sincerely,

Matthew G. Darrow  
Senior Transportation Engineer

"Leading the Way to Greater Mobility"
August 14, 2007

Mr. Evan Compton  
City of Sacramento  
Development Services Department  
Planning Division  
915 I Street, 3rd Floor, New City Hall  
Sacramento, CA 95814

SUBJECT: COMMENTS ON NATOMAS CROSSING PROJECT NOTIFICATION.

Dear Mr. Compton:

5-5 The Sacramento County Department of Transportation has reviewed the project application for the Natomas Crossing Development. We appreciate the opportunity to review this application.

It appears that this project will generate a significant amount of traffic on county facilities. Therefore, the environmental document for this project should analyze the project’s impacts on following the County facilities.

Roadway Segments

- El Centro Road from Del Paso Road to West El Camino Avenue
- North Market Boulevard from Gateway Park Boulevard to Northgate Boulevard
- San Juan Road from Garden Highway to El Centro Road
- Northgate Boulevard from I-80 to Main Street

5-6 Intersections

- Northgate Blvd/ Del Paso Rd
- National Dr/Del Paso Rd
- National Dr/N. Market Blvd
- Sierra Point Dr/N. Market Blvd.
- Northgate Blvd/N Market Blvd
- National Dr/Striker Ave
- San Juan Rd/ El Centro Rd

Any transportation modeling should include buildout of Metro Air Park, Elverta Specific Plan, Sutter Pointe Measure M Project, Placer Vineyards, and Greenbriar as part of the cumulative base conditions.
LETTER 5: Kamal Atwal  
Department of Transportation, County of Sacramento

Response to Comment 5-1

The City of Sacramento selected the study area based upon consideration of Notice of Preparation comments, knowledge of the trip generation of the proposed project, knowledge of the anticipated distribution of traffic associated with the proposed project, and known locations of operational difficulty. Some of the locations recommended for analysis by the County were located in the unincorporated portion of Sacramento County and were not included in the study area because the increase in traffic volumes due to the project were less than the threshold of significance for Sacramento County and would not result in significant impacts.

Table 4-1 below, “Selected Traffic Volumes Outside Study Area” (DKS Associates, 2 June 2009) provides information on cumulative and cumulative with project traffic volumes on the segments and at the intersections included in the County comments on the Notice of Preparation. The traffic volumes presented in the table are “unadjusted” travel model forecasts, except for daily volumes along North Market Boulevard and Northgate Boulevard. That is, they have not been factored to reflect recent traffic counts. However, in general, the percentage change in traffic shown in the table is considered a reliable indicator of traffic volume changes for screening purposes.

The County of Sacramento level of service criteria allows a change in volume-to-capacity (V/C) ratio of 0.05 without triggering an impact for roadways already operating at LOS “F” in the urban area. Thus, a change in traffic volumes of less than 5 percent will not result in a significant impact.

During the a.m. peak hour, changes in traffic volumes range from -5 percent to +1 percent. During the p.m. peak hour, changes in traffic volumes range from -2 percent to +3 percent with the exception of one segment. From a screening perspective, it is unlikely that this change would result in an impact. The San Juan Road segment east of Garden Highway increases by about 10 percent. However, the volume is less than 500 vehicles and meets the level of service criteria.

On a daily basis, changes in traffic volumes range from -2 percent to +4 percent. This change would not result in an impact (increase in V/C ratio is less than 0.05 per the Sacramento County thresholds of significance). The positive changes (increases in traffic volumes) are most pronounced on North Market Boulevard. However, the volumes (less than 22,000 vehicles daily) result in an acceptable level of service on a four-lane arterial.

Thus, while the selected study area does not include all of the locations requested by the County, the screening analysis indicates that the project would not result in significant cumulative impacts at these locations because traffic would have already dissipated to a less than significant level before reaching these locations.
### Table 4-1
Selected Traffic Volumes Outside Study Area

<table>
<thead>
<tr>
<th>Roadway Segment</th>
<th>Traffic Volumes</th>
<th>A.M. Peak Hour</th>
<th>P.M. Peak Hour</th>
<th>Daily</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cumulative</td>
<td>With Project</td>
<td>Percent Change</td>
<td>Cumulative</td>
</tr>
<tr>
<td>El Centro Road - Del Paso Road to West El Camino Avenue</td>
<td>1,724</td>
<td>1,691</td>
<td>-2%</td>
<td>1,766</td>
</tr>
<tr>
<td>South of Del Paso Road</td>
<td>1,644</td>
<td>1,596</td>
<td>-3%</td>
<td>1,658</td>
</tr>
<tr>
<td>North of Arena Boulevard</td>
<td>1,735</td>
<td>1,665</td>
<td>-5%</td>
<td>1,599</td>
</tr>
<tr>
<td>South of Arena Boulevard</td>
<td>2,096</td>
<td>2,012</td>
<td>-4%</td>
<td>1,923</td>
</tr>
<tr>
<td>North of San Juan Road</td>
<td>1,876</td>
<td>1,829</td>
<td>-3%</td>
<td>1,639</td>
</tr>
<tr>
<td>South of San Juan Road</td>
<td>2,179</td>
<td>2,147</td>
<td>-1%</td>
<td>2,109</td>
</tr>
<tr>
<td>North of West El Camino Avenue</td>
<td>1,751</td>
<td>1,729</td>
<td>-1%</td>
<td>1,912</td>
</tr>
<tr>
<td>North Market Boulevard - Gateway Park Boulevard to Northgate Boulevard</td>
<td>1,701</td>
<td>1,657</td>
<td>-3%</td>
<td>1,858</td>
</tr>
<tr>
<td>East of Gateway Park Boulevard</td>
<td>2,030</td>
<td>1,991</td>
<td>-2%</td>
<td>1,943</td>
</tr>
<tr>
<td>East of National Drive</td>
<td>2,321</td>
<td>2,301</td>
<td>-1%</td>
<td>2,262</td>
</tr>
<tr>
<td>West of Northgate Boulevard</td>
<td>629</td>
<td>599</td>
<td>-5%</td>
<td>439</td>
</tr>
<tr>
<td>East of Garden Highway</td>
<td>977</td>
<td>955</td>
<td>-2%</td>
<td>807</td>
</tr>
<tr>
<td>West of El Centro Road</td>
<td>5,200</td>
<td>5,129</td>
<td>-1%</td>
<td>4,990</td>
</tr>
<tr>
<td>North of I-80</td>
<td>5,119</td>
<td>5,046</td>
<td>-2%</td>
<td>4,928</td>
</tr>
<tr>
<td>South of North Market Boulevard</td>
<td>3,035</td>
<td>2,978</td>
<td>-2%</td>
<td>2,880</td>
</tr>
<tr>
<td>South of Main Avenue</td>
<td>5,598</td>
<td>5,536</td>
<td>-1%</td>
<td>5,453</td>
</tr>
<tr>
<td>Northgate Boulevard / Del Paso Road</td>
<td>4,506</td>
<td>4,543</td>
<td>1%</td>
<td>4,482</td>
</tr>
<tr>
<td>National Drive / Del Paso Road</td>
<td>2,534</td>
<td>2,499</td>
<td>-1%</td>
<td>2,567</td>
</tr>
<tr>
<td>National Drive / North Market Boulevard</td>
<td>2,066</td>
<td>2,026</td>
<td>-2%</td>
<td>2,217</td>
</tr>
<tr>
<td>Sierra Point Drive / North Market Boulevard</td>
<td>5,238</td>
<td>5,162</td>
<td>-1%</td>
<td>5,035</td>
</tr>
<tr>
<td>Northgate Boulevard / North Market Boulevard</td>
<td>1,901</td>
<td>1,913</td>
<td>1%</td>
<td>1,906</td>
</tr>
<tr>
<td>National Drive / Striker Avenue</td>
<td>2,799</td>
<td>2,755</td>
<td>-2%</td>
<td>2,490</td>
</tr>
</tbody>
</table>
Response to Comment 5-2

The comment does not address the adequacy of the DEIR, but rather serves to point out that there is an attachment to the County’s comment letter on the second NOP for the Natomas Crossing project. No further response is required.

Response to Comment 5-3

Please see Response to Comment 5-1 and Table 4-1. Based upon the analysis, the project would not cause an impact to El Centro Road since the increase in V/C ratio is less than 0.05 (per the Sacramento County thresholds of significance as mentioned above); therefore, the project is not required to include any roadway widening or improvements to this roadway facility. No further response is required.

Response to Comment 5-4

The DEIR defines improvements the applicant shall be required to implement as mitigation measures for this project. Additionally, the conditions of approval shall include all improvements required to be implemented with this project.

Furthermore, the updated North Natomas Finance Plan and the North Natomas Nexus Study, approved recently (May 26, 2009), are the key components of the North Natomas Development Fee Program which supports infrastructure needed to develop the land uses envisioned in the North Natomas Community Plan. The Financing Plan specifies needed infrastructure, financing mechanisms, and fees. The Nexus Study ensures statutory compliance of the fees by allocating infrastructure costs equitably among the Community Plan’s various land uses pursuant to the Mitigation Fee Act, as implemented through Chapter 18.24 of the City Code.

Response to Comment 5-5

The comment does not address the adequacy of the DEIR. No further response is required.

Response to Comment 5-6

Please see response to comment 5-1.

Response to Comment 5-7

Table 4.2-12 in the DEIR summarizes baseline and cumulative projects in the North Natomas area included in the analysis. As discussed on page 4.2-67 Methodology, the cumulative analysis includes land use within the City of Sacramento and the North Natomas Regional Analysis District (RAD) based upon the City of Sacramento 2030 General Plan. Land use projections beyond these areas are taken directly from SACOG forecasts.
May 27, 2009

032009SAC0028
03-SAC-05 PM 28.000
Natomas Crossing
Draft Environmental Impact Report (DEIR)
SCH# 2007112088

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

Dear Mr. Buford:

Thank you for the opportunity to review and comment on the Natomas Crossing DEIR. The project proposes to develop 150 acres at both the northeast and southeast quadrants of the Interstate 5/Arena Boulevard interchange. The project proposes multiple land use designations including office, retail, hospital, and future residential and hotel. The project is divided into quadrants A, B, C, and D, with development of quadrant B not being proposed at this time, and quadrant A being largely built out. Our comments are as follows:

- Table 4.2-11 of the Traffic Study, shows a trip generation of 3,399 for AM peak, and 5,074 for PM peak. Based on Figure 4.2-8, 56% of these trips will use I-5. That means this project will add about 1,900 AM peak hour trips, and 2,800 PM peak hour trips to I-5. Based upon the “Caltrans Guide for the Preparation of Traffic Impact Studies,” Caltrans considers 50-100 peak hour trips to be a significant impact on a state highway facility that operates at a LOS of D, as this segment of I-5 does.

- Impact 4.2-18, Intersections – Caltrans concurs with Mitigation Measure 4.2-18(a), Arena Boulevard and I-5 Northbound Ramps, that “the project applicant shall pay a fair share contribution toward future restriping of the northbound ramp approach to the intersection to provide a single left turn lane and a triple right turn lane, subject to review and approval by Caltrans…”

"Caltrans improves mobility across California"
Mr. Tom Buford  
May 27, 2009 
Page 2

Letter 6  
Cont’d.

6-4  
• Impact 4.2-20, Freeway Mainline – Caltrans concurs with Mitigation Measure 4.2-20, that “the project applicant shall pay development fees for infrastructure projects as outlined in the North Natomas Financing Plan (NNFP) as its required share of all freeway-related improvements…”

6-5  
• Impact 4.2-21, Freeway Ramp Junctions – Caltrans concurs with Mitigation Measure 4.2-21, that “…the project applicant will pay its required share of freeway-related improvements by paying the PFF…”

6-6  
• Though we concur with the mitigation, the City of Sacramento has not met the requirements of the North Natomas Community Plan, the 1995 Cooperative Agreement (City Agreement 95-317), or “Appendix A – The Kittleson Report” for construction of highway improvements that are made necessary by the build out of the North Natomas community. The City of Sacramento has not been consistently collecting the fees from North Natomas development to fund the highway improvements identified in those documents, such as the I-80/West El Camino interchange. And, as the Level of Service triggers have been met, the City has not completed the project development steps that are called for in the agreements and has not constructed all of the required improvements.

Caltrans acknowledges that development has stalled in the area, which makes funding the array of infrastructure needs difficult. Caltrans and the City have discussed the need for the highway improvement projects to move forward to construction. The City must ensure that the appropriate fees are collected from this development and applied to construction of the required State Highway System (SHS) projects.

6-7  
• A Transportation Management Plan (TMP) should be prepared by the project proponent and submitted to the Caltrans District 3 Traffic Manager, John Holzhauser, for review. The TMP should identify access points to the SHS and provide the estimated type and number of vehicles. Mr. Holzhauser may be reached at (916) 859-7978

“Caltrans improves mobility across California”

CHAPTER 3 – RESPONSES TO COMMENTS

3 - 24
If you have any questions regarding these comments, or to further discuss the funding and timing of the required improvements, please contact Gabriel Corley at (916) 274-0611.

Sincerely,

[Signature]

ALYSSA BEGLEY, Chief
Office of Transportation Planning - South

cc: State Clearinghouse
Response to Comment 6-1

The comment is introductory and does not address the adequacy of the DEIR. No further response is required.

Response to Comment 6-2

The commenter’s calculation of additional trips on the freeway system is overstated. The calculation assumes that all trips associated with the project are new trips. In reality, diverted trips and pass-by trips comprise a substantial portion of the trips associated with the project.

According to “Caltrans Guide for the Preparation of Traffic Impact Studies,” the addition of 50 to 100 trips to a Caltrans facility operating at LOS “C” or “D” is a threshold for the determination of whether a traffic study is necessary. The guide does not indicate that this increase automatically results in a significant impact. Criteria for the determination of significant impacts on freeway facilities are based upon Caltrans level of service goals for the urban Sacramento freeway system, which is LOS “E”; and the several other criteria to define impacts to freeway facilities are included in the DEIR on page 4.2-34. This criteria is used in the traffic study to determine the impact of the project on the freeway facilities.

Response to Comment 6-3

The comment indicates the commenter’s concurrence with the language of DEIR traffic Mitigation Measure 4.2-18.

Response to Comment 6-4

The comment indicates the commenter’s concurrence with the language of DEIR traffic Mitigation Measure 4.2-20.

Response to Comment 6-5

The comment indicates the commenter’s concurrence with the language of DEIR traffic Mitigation Measure 4.2-21.

Response to Comment 6-6

Impact fees are collected from all developments at the time of building permit issuance or at time of occupancy permit issuance in compliance with the Fee Mitigation Act (Government Code Section 66000 et seq.). The fees are set based on the expenditure plan and adjusted annually to account for inflation; the expenditure plan is reviewed at least every three years per the “Nexus” requirements and the fees are adjusted as needed. The traffic fair share of the interchange in question is included in the expenditure plan. The City Council has the discretion to determine the
timing for construction of the improvements in the expenditure plan based on the amount of the fees collected, the need for the improvement, and the available funding from non-impact fee sources.

**Response to Comment 6-7**

The applicant is required to prepare a Construction Traffic Management Plan as part of MM 4.2-17. Additionally, the City approved an Air Quality/Transportation System Management Plan (AQ/TSM, see Appendix C) on March 1, 2002 for the Natomas Crossing Area 3, in which the project is located. The estimated number of vehicles accessing the State Highway System (SHS) was included in the traffic analysis prepared for the Transportation and Circulation section of the DEIR.

**Response to Comment 6-8**

The comment does not address the adequacy of the DEIR. No further response is required.
May 28, 2009

Scott Johnson, Associate Planner
Development Services Department
City of Sacramento
SRJohnson@cityofsacramento.org

RE: Natomas Crossing Project #P04-264 Draft Environmental Impact Report

Dear Mr. Johnson:

Thank you for the opportunity to comment on the Natomas Crossing project DEIR. WALKSacramento would like the City of Sacramento to consider additional mitigation to reduce the impacts to pedestrian circulation in the vicinity of Quadrants C and D resulting from cumulative conditions.

The DEIR considers approximately 393,000 square feet of retail uses in Quadrant C, and approximately 600,000 square feet of hospital use and 600,000 square feet medical office use in Quadrant D. Quadrant C is on the west side of East Commerce Way between Arena Boulevard and Natomas Crossing Drive. Quadrant D is on the west side of East Commerce Way between Natomas Crossing Drive and San Juan Road.

Existing pedestrian access to the site is limited due to a lack of sidewalks on the west side of East Commerce Way and the southbound roadway is not constructed to its ultimate configuration between Arena Boulevard and Natomas Crossing Drive. East Commerce Way has not been constructed between Natomas Crossing Drive and San Juan Road.

Pedestrian facilities proposed to mitigate impacts to pedestrian circulation include pedestrian pathways, shelters and benches, way finding, lighting, a driveway access plan. In addition, mitigations could also include raised crosswalks and pedestrian signal heads.

Mitigation Measure 4.4-3 (f) for long term increases in criteria air pollutants states: Provide pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements that reduce motor vehicle speeds and encourage pedestrian and bicycle trips. Actions taken such as this not only reduce air pollution, but they encourage more walking trips because pedestrians feel safer and they are not exposed to as much noise from vehicles.

WALKSacramento believes the most effective action that goes beyond City of Sacramento requirements is to construct East Commerce Way between Arena...
Boulevard and Natomas Crossing Drive as a 4-lane roadway. This would shorten the crossing distances for pedestrians making it easier and safer for pedestrians to cross; it would slow the speed of traffic, reducing the severity of pedestrian-vehicle collisions and making the environment less noisy, and it would reduce air pollution caused by accelerations to higher arterial speeds.

WALKSacramento suggests that East Commerce Way be configured as two lanes in each direction, with parking and bicycle lanes on both sides, with a speed limit set between 25 mph and 35 mph. Curb extensions should be used to shorten crossing distances and slow traffic. Right-turn lanes should not preclude curb extensions except to reduce dangerous queuing lengths. Pedestrian refuges should be constructed in medians at each intersection.

Figure 4.2-2 Project Access Plan shows three existing/under construction traffic signals, three proposed traffic signals, and four right-in/right-out driveways on East Commerce Way from Arena Boulevard to the southern boundary of the project site. This means there will be ten vehicle conflict points in less than 3/4 mile, and six of those points will be signalized intersections. Table 4.2-3 Daily Volume Threshold for Roadway Segments indicates that low access control arterials, i.e., those with more than four stops per mile, should have a speed limit of 25-35 mph. East Commerce Way adjacent to Quadrants C and D will have the equivalent of eight stops per mile. Therefore, the roadway should be subject to traffic calming and a road diet to produce speeds such that a speed limit of 35 mph or less can be posted.

WALKSacramento encourages people to walk and bicycle in their communities. The benefits include improved physical fitness, 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. If you have questions or need additional information, please contact me at (916) 709-9843 or chglm@walksacramento.org.

Sincerely,

Chris Holm
Project Analyst

WALKSacramento
909 12th Street, Suite #122
Sacramento, CA 95814
Response to Comment 7-1

The commenter expresses general concerns regarding the pedestrian circulation in the vicinity of Quadrants C and D; please see responses to comments 7-3 through 7-6.

Response to Comment 7-2

The comment does not address the adequacy of the DEIR. No further response is required.

Response to Comment 7-3

Mitigation Measure 4.2-6 in the Transportation and Circulation chapter of the DEIR (Chapter 4.2) specifically addresses the commenter’s concern, as demonstrated by a review of the measure’s text:

4.2-6 Prior to the issuance of building permits, the project applicant shall identify the necessary on- and off-site pedestrian and bicycle facilities to serve the proposed development to the satisfaction of the City of Sacramento Traffic Engineering Division. These facilities shall be incorporated into the project and could include sidewalks, stop signs, standard pedestrian and school crossing warning signs, lane striping to provide a bicycle lane, bicycle parking, signs to identify pedestrian and bicycle paths, raised crosswalks, and pedestrian signal heads. Sidewalks would be required as part of the frontage improvements along all new roadway construction in the project vicinity in conformance with City design standards. Circulation and access to all proposed public spaces shall include sidewalks that meet Americans with Disabilities Act standards. This mitigation measure would reduce the impact of the project to a less-than-significant level.

This mitigation measure ensures that pedestrian and bicycle facilities will be incorporated into the project and specifically states that raised crosswalks and pedestrian signal heads could be used to mitigate impacts, as the commenter suggests.

Response to Comment 7-4

Reduction of the number of lanes of East Commerce Way between Arena Boulevard and Natomas Crossing Drive from six lanes to four lanes would result in substantial congestion at the intersections along this roadway, and would result in the diversion of vehicular trips to other nearby roadways. Such diversion could include “cut-through” trips in residential neighborhoods. Substantial queues would result at the subject intersections, potentially extending through and blocking crosswalks at adjacent intersections. The assumption in the Transportation and Circulation section of the DEIR of the number of lanes for East Commerce Way is consistent with the 2030 General Plan and North Natomas Community Plan.
Response to Comment 7-5

Please see the response to comment 7-4.

Response to Comment 7-6

A low access control arterial, as shown on Table 4.2-3 in the DEIR, could be for two-, four-, and six-lane roadways depending on roadway capacity and the maximum volume the roadway can accommodate within the acceptable level of service. More stops per mile in an arterial normally lead to lower speeds within this roadway segment. Furthermore, the number of lanes for Commerce Way within the project vicinity is consistent with the recently adopted 2030 General Plan.

Response to Comment 7-7

The comment does not address the adequacy of the DEIR. No further response required.
May 28, 2009

Tom Buford
City of Sacramento, Planning Division
300 Richards Boulevard
Sacramento, CA 95811

Subject: Natomas Crossing
SCH#: 2007112088

Dear Tom Buford:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 26, 2009, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street  P.O. Box 3044  Sacramento, California  95812-3044
(916) 445-0613  FAX (916) 323-3018  www.cpr.ca.gov
The project site comprises the majority of the Natomas Crossing-Alleghany Area #3 PUD, which consists of Quadrants A-D. The project encompasses 74.9 gross acres for Quadrant B, 52.9 gross acres for Quadrant C, and 39.8 gross acres for Quadrant D for a total of 167.6 gross acres. Quadrant A has already been largely developed and is not part of this project.

The southern portion of Quadrant B will be rezoned from Employment Center and Commercial to Shopping Center to allow for the future development of retail spaces within the range of 309,276 to 463,914 sf. The northern portion of Quadrant B would not require a rezone, as the proposed land users are generally consistent with those planned for the site in previous approvals. Future development of the northern portion of Quadrant B is anticipated to include:

- * 10 acres of Residential with approximate total of 160 units;
- * 5 acres of Hotel use consisting of ~130,000 sf or 300 rooms;
- * 14 acres of Office consisting of ~240,000 sf.

It is important to note that development of Quadrant B is not proposed at this time.

The 47.2 net acres in Quadrant C portion of the project are proposed for both retail and office development. More specifically, Quadrant C includes 404,580 sf of regional retail uses and 200,000 sf of office uses. One large retail pad is proposed in the northern portion of Quadrant C, consisting of a 137,933 sf large formal retail pad with an attached 31,179 sf garden center. Quadrant C would include a total of 20 retail pads and two office pads. Primary access to this portion of the project site would be provided via three entrances along East Commerce Way and a right-in only from Arena Boulevard.

Quadrant D includes the future development of ~600,000 sf for a hospital, and an additional 600,000 sf for medical office uses. The northeastern portion of the hospital building (i.e. side closest to East Commerce Way) is anticipated to be a multi-story building, with a maximum of five stories. In addition, the project includes the construction of a 30,000 sf Central Utility Plant that would house the heating and cooling equipment for the hospital's air and water systems, as well as a back-up generator system for power outages.
### Chapter 3 – Responses to Comments

#### Lead Agency Contact
- **Name**: Tom Rutherford
- **Agency**: City of Sacramento, Planning Division
- **Phone**: 916-808-7931
- **Email**: 300 Richards Boulevard
- **City**: Sacramento
- **State**: CA
- **Zip**: 95811

#### Project Location
- **County**: Sacramento
- **City**: Sacramento
- **Region**:
- **Lat / Long**: 38° 38' 11" N / 121° 31' 16" W
- **Cross Streets**: I-5, E. Commerce Way
- **Parcel No.**: 225-0070-113, 115; 225-0140-065, 087, 225-0150-043, 053, 054; 225-0160-059; 225-0310-028
- **Township**

#### Proximity to:
- **Highways**: 80, 5, 99
- **Airports**
- **Railways**
- **Waterways**: Sacramento River, Natomas Main Drain Canal
- **Schools**: Inderkum HS, Witter Ranch ES, Westlake Charter, Natomas MS,
- **Land Use**: vacant, mass-graded
- **Z**: Limited Commercial, Employment Commercial, EC-50
- **GP**: Planned Development

#### Project Issues
- Air Quality; Flood Plain/Flooding; Cumulative Effects; Noise; Traffic/Circulation; Water Quality

#### Reviewing Agencies
- Resources Agency; Department of Fish and Game, Region 2; Office of Historic Preservation;
- Department of Parks and Recreation; Central Valley Flood Protection Board; Department of Water Resources; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Bd., Region 5 (Sacramento); California Highway Patrol; Caltrans, District 3; Department of Food and Agriculture; Native American Heritage Commission

#### Date Received
- **04/09/2009**
- **Start of Review**: 04/09/2009
- **End of Review**: 05/26/2009

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*Note: Blanks in data fields result from insufficient information provided by lead agency.*
Response to Comment 8-1

The comment indicates that the State Clearinghouse received the Natomas Crossing DEIR and distributed the DEIR to public agencies for review. In addition, the comment indicates that the project has complied with State Clearinghouse review requirements for draft environmental documents, pursuant to CEQA. The comment does not address the adequacy of the DEIR. No further response required.
4. MITIGATION MONITORING PROGRAM
4.0 INTRODUCTION

Section 15097 of the California Environmental Quality Act (CEQA) Guidelines requires all state and local agencies to establish monitoring or reporting programs for projects approved by a public agency whenever approval involves the adoption of either a “mitigated negative declaration” or specified environmental findings related to environmental impact reports.

The following is the Mitigation Monitoring Program (MMP) for the Natomas Crossing project. The project as approved includes mitigation measures to address impacts of the project. The intent of the MMP is to prescribe a means for properly and successfully implementing and enforcing the mitigation measures as identified within the Environmental Impact Report for this project. Unless otherwise noted, the cost of implementing the mitigation measures as prescribed by this MMP shall be funded by the applicant.

4.1 COMPLIANCE CHECKLIST

The MMP contained herein is intended to satisfy the requirements of CEQA as they relate to the Environmental Impact Report for the Natomas Crossing project prepared by the City of Sacramento. This MMP is intended to be used by City staff and mitigation monitoring personnel to ensure compliance with mitigation measures during project implementation. Mitigation measures identified in this MMP were developed in the Environmental Impact Report prepared for the proposed project.

The Natomas Crossing project Environmental Impact Report presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA as a measure which:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

(CEQA Guidelines Section 15370.) The intent of the MMP is to ensure the effective implementation and enforcement of adopted mitigation measures and permit conditions. The
MMP will provide for monitoring of construction activities as necessary and in-the-field identification and resolution of environmental concerns.

Monitoring and documenting the implementation of mitigation measures will be coordinated by the City of Sacramento. The table attached to this report identifies the impact number, impact, mitigation measure, the monitoring agency for the mitigation measure, the implementation schedule, and signoff. The applicant will be responsible for fully understanding and effectively implementing the mitigation measures contained within the MMP. The City of Sacramento will be responsible for ensuring compliance.

### 4.2 Mitigation Monitoring Program

The following table indicates the mitigation measure number, the impact the measure is designed to address, the measure text, the monitoring agency, implementation schedule, and an area for sign-off indicating compliance.
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<tr>
<th>Impact Number</th>
<th>Impact</th>
<th>Mitigation Measure</th>
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<tbody>
<tr>
<td>4.2-1</td>
<td>Intersections.</td>
<td>4.2-1 <em>East Commerce Way and Arena Boulevard</em> – The project applicant shall add southbound, westbound, and eastbound exclusive right turn signal phases to this intersection. The project applicant shall provide funding to the City Traffic Operations Center (TOC) to monitor and retime the traffic signal. This mitigation shall be implemented on or before 80 percent of development as measured by a.m. peak hour trip generation, 60 percent of development as measured by p.m. peak hour trip generation, and 65 percent of development as measured by Saturday peak hour trip generation. This mitigation measure improves intersection operating conditions to LOS “C” (21.9 seconds average delay) during the a.m. peak hour, LOS “C” (34.2 seconds average delay) during the p.m. peak hour, and LOS “C” (29.2 seconds average delay) during the Saturday peak hour. This mitigation measure would reduce the impact of the project to a <em>less-than-significant</em> level.</td>
<td>Community Development Department</td>
<td>On or before 80 percent of development as measured by a.m. peak hour trip generation, 60 percent of development as measured by p.m. peak hour trip generation, and 65 percent of development as measured by Saturday peak hour trip generation.</td>
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### MITIGATION MONITORING PROGRAM
### NATOMAS CROSSING

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<td>4.2-6</td>
<td>Pedestrian and Bicycle Circulation Impacts.</td>
<td>Prior to the issuance of building permits, the project applicant shall identify the necessary on- and off-site pedestrian and bicycle facilities to serve the proposed development to the satisfaction of the City of Sacramento Traffic Engineering Division. These facilities shall be incorporated into the project and could include sidewalks, stop signs, standard pedestrian and school crossing warning signs, lane striping to provide a bicycle lane, bicycle parking, signs to identify pedestrian and bicycle paths, raised crosswalks, and pedestrian signal heads. Sidewalks would be required as part of the frontage improvements along all new roadway construction in the project vicinity in conformance with City design standards. Circulation and access to all proposed public spaces shall include sidewalks that meet Americans with Disabilities Act standards. This mitigation measure would reduce the impact of the project to a less-than-significant level.</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
<td>Community Development Department</td>
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<tr>
<td>4.2-8</td>
<td>Parking Impacts.</td>
<td>The project shall provide parking in accordance with City zoning</td>
<td>Community Development</td>
<td>Prior to the approval of final</td>
<td>Community Development</td>
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| 4.2-17        | Construction | Prior to beginning of construction, a construction traffic and parking management plan shall be prepared by the applicant to the satisfaction of the City traffic engineer and subject to review by all affected agencies. The plan shall ensure that acceptable operating conditions on local roadways and freeway facilities are maintained. At a minimum, the plan shall include:  
- The number of truck trips, time, and day of street closures.  
- Time of day of arrival and departure of trucks.  
- Limitations on the size and type of trucks, provision of a staging area with a limitation on the number of trucks that can be waiting.  
- Provision of a truck circulation pattern.  
- Provision of driveway access plan so that safe vehicular, pedestrian, and bicycle | Department of Transportation | Prior to the beginning of construction | Department of Transportation |

Table 4.2-20 summarizes the parking requirement based upon the City zoning code. This mitigation measure would reduce the impact of the project to a less-than-significant level.
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<td>movements are maintained (e.g., steel plates, minimum distances of open trenches, and private vehicle pick up and drop off areas).</td>
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<td>• Maintain safe and efficient access routes for emergency vehicles.</td>
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<td>• Manual traffic control when necessary.</td>
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<td></td>
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<td>• Proper advance warning and posted signage concerning street closures.</td>
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<td></td>
<td>• Provisions for pedestrian safety.</td>
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<tr>
<td>4.2-18</td>
<td>Intersections.</td>
<td>4.2-18(a) Arena Boulevard and I-5 Northbound Ramps – The project applicant shall pay a fair share contribution toward future restriping of the northbound ramp</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
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A copy of the construction traffic management plan shall be submitted to local emergency response agencies and these agencies shall be notified at least 14 days before the commencement of construction that would partially or fully obstruct roadways. Implementation of the mitigation measure would reduce this impact to **less-than-significant**.
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<td>approach to the intersection to provide a single left turn lane and a triple right turn lane, subject to review and approval by Caltrans. This mitigation measure improves intersection operating conditions to LOS “B” (18.1 seconds average delay) during the Saturday peak hour and would reduce the impact of the project to a <strong>less-than-significant</strong> level.</td>
<td>Transportation</td>
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<td>4.2-18(b)</td>
<td>East Commerce Way and Del Paso Road – The project applicant shall pay a fair share contribution toward adding a northbound exclusive right turn signal phase to this intersection, and provide a fair share contribution to the City’s TOC to monitor and retune the traffic signal when needed. This mitigation measure improves intersection operating conditions to LOS “E” (73.0 seconds average delay) during the Saturday peak hour and would reduce the impact of the project to a <strong>less-than-significant</strong> level.</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
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<td>4.2-18(c)</td>
<td>East Commerce Way and Arco Arena Main Entrance / Road B3 – The project applicant shall pay a</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
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<td>fair share contribution toward adding a westbound exclusive right turn signal phase to this intersection, and provide a fair share contribution to the City’s TOC to monitor and retime the traffic signal when needed. This mitigation measure improves intersection operating conditions to LOS “D” (48.2 seconds average delay) during the p.m. peak hour and LOS “C” (25.9 seconds average delay) during the Saturday peak hour. This would reduce the impact of the project to a less-than-significant level.</td>
<td>Department of Transportation</td>
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<tr>
<td>4.2-18(d) East Commerce Way and Arena Boulevard</td>
<td>The project applicant shall pay a fair share contribution toward adding exclusive right turn signal phases to all four approaches at this intersection, and provide a fair share contribution to the City’s TOC to monitor and retime the traffic signal when needed. This mitigation measure improves intersection operating conditions to LOS “F” (92.0 seconds average delay) during the a.m. peak hour and LOS “D” (38.7 seconds average delay) during the Saturday peak hour.</td>
<td>Community Development Department</td>
<td>Department of Transportation</td>
<td>Prior to the issuance of building permits</td>
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<td>peak hour. This would reduce the impact of the project to a less-than-significant level.</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
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<td>4.2-18(e)</td>
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<td>East Commerce Way and Natomas Crossing Drive – The project applicant shall pay a fair share contribution toward adding a northbound exclusive right turn signal phase to this intersection, and provide a fair share contribution to the City’s TOC to monitor and retime the traffic signal when needed. This mitigation measure improves intersection operating conditions to LOS “E” (75.5 seconds average delay) during the p.m. peak hour and would reduce the impact of the project to a less-than-significant level.</td>
<td>Department of Transportation</td>
<td>Prior to the issuance of building permits</td>
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<td>4.2-18(f)</td>
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<td>East Commerce Way and Road D2 – The project applicant shall provide an eastbound double left turn lane, pay a fair share contribution toward adding an exclusive right turn signal phase to the southbound intersection approach, and provide a fair share contribution to the City’s TOC to monitor and retime the traffic signal when needed. This mitigation measure</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
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<td>measure improves intersection operating conditions to LOS “C” (28.5 seconds average delay) during the a.m. peak hour and LOS “C” (30.5 seconds average delay) during the p.m. peak hour. This would reduce the impact of the project to a <strong>less-than-significant</strong> level.</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
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<td>4.2-18(g)</td>
<td></td>
<td>East Commerce Way and San Juan Road – The project applicant shall pay a fair share contribution toward adding a westbound exclusive right turn signal phase to this intersection, and provide a fair share contribution to the City’s TOC to monitor and retime the traffic signal when needed. This mitigation measure improves intersection operating conditions to LOS “D” (36.8 seconds average delay) during the a.m. peak hour and LOS “B” (14.5 seconds average delay) during the p.m. peak hour. This would reduce the impact of the project to a <strong>less-than-significant</strong> level.</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
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<td>4.2-18(h)</td>
<td></td>
<td>Truxel Road and Arena Boulevard – The project applicant shall pay a fair share contribution toward adding an eastbound exclusive right</td>
<td>Community Development Department</td>
<td>Prior to the issuance of building permits</td>
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<tr>
<td>4.2-20</td>
<td>Freeway Mainline.</td>
<td>The project applicant shall pay development fees for infrastructure projects as outlined in the North Natomas Financing Plan (“NNFP”) as its required share of all freeway-related improvements. In addition to payment for freeway related improvements, ramps and interchanges, the North Natomas Finance Plan includes a share of the Downtown Natomas Airport Light Rail Extension (DNA) project costs. The DNA project provides future congestion relief for both the I-80 and I-5 freeways and is included in the Metropolitan Transportation Plan.</td>
<td>Department of Transportation</td>
<td>Pay NNFP and PFF fees prior to issuance of building permit</td>
<td>Community Development Department</td>
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</table>

**Turn signal phase to this intersection, and provide a fair share contribution to the City’s TOC to monitor and retine the traffic signal when needed. This mitigation measure improves intersection operating conditions to LOS “E” (72.0 seconds average delay) during the a.m. peak hour and LOS “C” (32.7 seconds average delay) during the Saturday peak hour. This would reduce the impact of the project to a less-than-significant level.**
In conjunction with the North Natomas Community Plan ("NNCP") and the NNFP, in 1994 the City of Sacramento prepared the North Natomas Freeway-Related Improvements Study (the "Kittleson Report"), which analyzed freeway-related impacts associated with development of the NNCP. The Kittleson Report recommended various improvements to the freeway mainlines, auxiliary lanes and interchanges and estimated that 43 percent of the cost for the proposed improvements are attributable to North Natomas. The Kittleson Report was discussed in further detail in the NNFP, which, in order to implement the Kittleson Report, provides that a portion of the PFF will be earmarked for the freeway-related improvements identified in the Kittleson Report.

Payment of the PFF fees cannot assure that impacts at the freeway ramp junctions will be reduced to a less than significant level. To partially offset these impacts, the applicant will pay its required share of freeway-related improvements by

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<td>In conjunction with the North Natomas Community Plan (“NNCP”) and the NNFP, in 1994 the City of Sacramento prepared the North Natomas Freeway-Related Improvements Study (the “Kittleson Report”), which analyzed freeway-related impacts associated with development of the NNCP. The Kittleson Report recommended various improvements to the freeway mainlines, auxiliary lanes and interchanges and estimated that 43 percent of the cost for the proposed improvements are attributable to North Natomas. The Kittleson Report was discussed in further detail in the NNFP, which, in order to implement the Kittleson Report, provides that a portion of the PFF will be earmarked for the freeway-related improvements identified in the Kittleson Report.</td>
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<tr>
<td>4.2-21</td>
<td>Freeway Ramp Junctions.</td>
<td>Implement Mitigation Measure 4.2-20. Payment of the PFF fees cannot assure that impacts at the freeway ramp junctions will be reduced to a less than significant level. To partially offset these impacts, the applicant will pay its required share of freeway-related improvements by paying the PFF. Nevertheless, given the uncertainty regarding the timing and completion of the proposed freeway improvements and because the California Environmental Quality Act (Pub. Resources Code, §21000 et seq.) defines “feasible” for these purposes as capable of being accomplished in a successful manner with a reasonable period of time, taking into account economic, environmental, social, and technological factors (Pub. Resources Code, Section 21061.1), the impacts of the project on the freeway mainline would remain <strong>significant and unavoidable</strong>.</td>
<td>See Mitigation Measure 4.2-20</td>
<td>See Mitigation Measure 4.2-20</td>
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<td><strong>Environmental Quality Act (Pub. Resources Code, §21000 et seq.)</strong> defines “feasible” for these purposes as capable of being accomplished in a successful manner with a reasonable period of time, taking into account economic, environmental, social, and technological factors (Pub. Resources Code, Section 21061.1). The impacts of the project on the freeway ramp junctions would remain significant and unavoidable.</td>
<td>4.2-22 Freeway Ramp Queuing. 4.2-22 Implement Mitigation Measure 4.2-18(a). This mitigation measure would reduce the queue to 2,175 feet and would increase the available storage space for the right turn movement to 3,135 feet. This would reduce the impact of the project to a less-than-significant level.</td>
<td>See Mitigation Measure 4.2-18(a)</td>
<td>See Mitigation Measure 4.2-18(a)</td>
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### 4.3 Noise

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<tr>
<td>4.3-2</td>
<td>Loading dock and truck circulation noise impacts.</td>
<td>4.3-2 In conjunction with the submittal of a site plan for Quadrant B, the applicant shall retain a qualified acoustical consultant to prepare a site-specific noise analysis for Quadrant B. If the report determines that on-site operations would exceed</td>
<td>Community Development Department</td>
<td>In conjunction with the submittal of a site plan for Quadrant B</td>
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<td>the City of Sacramento significance thresholds, which are 45 dB Ldn for interior noise levels at residential uses and 60 dB Ldn for exterior noise levels at outdoor common areas, the report shall include recommendations to reduce noise below the City’s applicable noise level standards, for the review and approval of the Community Development Department. If the report determines that on-site operations would not exceed the City of Sacramento significance thresholds, further mitigation is not required.</td>
<td>See Mitigation Measure 4.3-2 Community Development Department</td>
<td>Prior to the issuance of a building permit for the Central Utility Plant (CUP) building located adjacent to the proposed parking structure on Quad D, the overall noise levels associated with the CUP building’s typical operations shall not exceed 45 dB Ldn for interior noise levels and 60 dB Ldn for exterior noise levels at the nearest residence, as demonstrated by an acoustical consultant for the review and</td>
<td>See Mitigation Measure 4.3-2 CUP building located adjacent to the proposed parking structure on Quadrant D</td>
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<td>Approval of the Community Development Department. Mitigation measures shall include the use of silencers or acoustical louvers on openings for air intake or exhaust, and locating openings for air intake and exhaust on the opposite sides of the building from residences to the east. In addition, emergency generators shall be equipped with hospital grade mufflers to reduce the overall noise levels associated with their operations during periods of power failures or other emergencies. Emergency generators shall be exercised during the daytime hours for a period of no more than 30 minutes to reduce the potential for annoyance.</td>
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<tr>
<td>4.3-6</td>
<td>Traffic noise levels at proposed on-site residential uses.</td>
<td>4.3-6 In conjunction with the submittal of a site plan for Quadrant B, the applicant shall retain a qualified acoustical consultant to prepare a site-specific noise analysis for Quadrant B. If the report determines that noise levels for the residential portion of the site would exceed the City of Sacramento significance thresholds, which are 45 dB Ldn for interior noise levels at residential</td>
<td>Community Development Department</td>
<td>In conjunction with the submittal of a site plan for Quadrant B</td>
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<td>4.3-7</td>
<td>Traffic noise levels at the proposed hospital.</td>
<td>Prior to issuance of a building permit for Quadrant D, the site plan(s) shall indicate that patient rooms and offices on the west-facing facades of the hospital shall include windows with an STC rating of 40, windows on the north- and south-facing facades shall have an STC rating of 38, and windows on the east-facing facade shall have an STC rating of 35. The site plan(s) shall be submitted for the review and approval of the Community Development Department.</td>
<td>Community Development Department</td>
<td>Prior to issuance of a building permit for Quadrant D</td>
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### 4.4 Air Quality

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<td>4.4-1</td>
<td>Short-term increases of construction-generated</td>
<td>Prior to the issuance of any grading permit, the project</td>
<td>SMAQMD</td>
<td>Prior to the issuance of any</td>
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<td>emissions of criteria air pollutants.</td>
<td>applicant/developer shall provide a plan for approval by the City, in consultation with SMAQMD, demonstrating that the heavy-duty (&gt;50 horsepower), off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project-wide fleet-average 20 percent NO\textsubscript{X} reduction and 45 percent particulate reduction compared to the most recent CARB fleet average at the time of construction. Acceptable options for reducing emissions include the use of late-model engines, low-emission diesel products, alternative fuels, particulate matter traps, engine retrofit technology, after-treatment products, and/or such other options as become available.</td>
<td>Community Development Department</td>
<td>grading permit</td>
<td></td>
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</tbody>
</table>

4.4-1(b) Prior to the issuance of any grading permit, the project applicant/developer shall submit to the City and SMAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 hp, that will be used an aggregate of 40 or more hours during any portion of the grading permit | SMAQMD Community Development Department | Prior to the issuance of any grading permit |
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<td>project. The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction operations occur. At least 48 hours before subject heavy-duty off-road equipment is used, the project representative shall provide the SMAQMD with the anticipated construction timeline including start date, and the name and phone number of the project manager and on-site foreman.</td>
<td>SMAQMD Community Development Department</td>
<td>During construction</td>
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4.4-1(c) During construction, the project applicant/developer shall ensure that emissions from off-road, diesel-powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour, as determined by an on-site qualified inspector trained in visual emissions assessment. Any equipment found to exceed 40 percent opacity (or Ringlemann 2.0) shall be repaired immediately, and the SMAQMD shall be notified of non-compliant equipment within 48 hours of
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<td>identification. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of visual survey results shall be submitted throughout the duration of the construction project, except that the monthly summary shall not be required for any 30-day period in which no construction operations occur. The monthly summary shall include the quantity and type of vehicles surveyed, as well as the dates of each survey. The SMAQMD and/or other officials may conduct periodic site inspections to determine compliance.</td>
<td>SMAQMD Community Development Department</td>
<td>Prior to issuance of building or grading permits</td>
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4.4-1(d) The project applicant shall pay a mitigation fee to the SMAQMD to offset any remaining construction-generated daily NOX emissions in excess of the SMAQMD’s significance threshold of 85 lbs/day. SMAQMD mitigation fees shall be calculated and paid in coordination with SMAQMD prior to issuance of building or grading permits. Based on the currently proposed construction schedule, the simultaneous development of
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<td>4.4-2</td>
<td>Short-term increases in fugitive dust.</td>
<td><strong>4.4-2</strong> Prior to the approval of any grading permit, the project proponent shall submit a dust-control plan to the City of Sacramento Community Development Department. The dust-control plan shall stipulate grading schedules associated with the project phase (i.e., Quadrants B, C1-4, and Quadrant D).</td>
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<td></td>
<td>Community Development Department</td>
<td></td>
<td>Prior to the approval of any grading permit Dust control plan shall be incorporated into all construction</td>
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<td>D), as well as the dust-control measures to be implemented. Grading of proposed project phases shall be scheduled so that the total area of disturbance would not exceed 15 acres on any given day. The dust control plan shall be incorporated into all construction contracts issued as part of the proposed project development. The dust-control plan shall, at a minimum, incorporate the following measures:</td>
<td></td>
<td>contracts issued as part of the proposed project development</td>
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<td>• Apply water, chemical stabilizer/suppressant, or vegetative cover to disturbed areas, including storage piles that are not being actively used for construction purposes, as well as any portions of the construction site that remain inactive for longer than 3 months;</td>
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<td></td>
<td>• Water exposed surfaces sufficient to control fugitive dust emissions during demolition, clearing, grading, earth-moving, or excavation operations. Actively disturbed areas should be kept moist at all</td>
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Chapter 4 — Mitigation Monitoring Program  4-22
### MITIGATION MONITORING PROGRAM

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<tr>
<td>4.4-3</td>
<td>Long-term increases of criteria air pollutants.</td>
<td><strong>4.4-3</strong> Prior to project approval, the project applicant shall obtain written endorsement from the SMAQMD for an Air Quality Mitigation Plan (AQMP) for the proposed project. The AQMP shall be reviewed and endorsed by SMAQMD staff prior to project implementation. In accordance with SMAQMD recommendations, the AQMP shall achieve a minimum overall reduction of 15 percent in the project’s</td>
<td>SMAQMD Community Development Department</td>
<td>The SMAQMD endorsed an AQMP for the Natomas Crossing Project on April 27, 2009.</td>
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### MITIGATION MONITORING PROGRAM

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<td>anticipated operational emissions of NO&lt;sub&gt;x&lt;/sub&gt; and ROG. Measures anticipated to be applicable to the proposed project and currently recommended by the SMAQMD include, but are not limited to, the following:</td>
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<td></td>
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<td>a. Provide on-site short-term and long-term bicycle parking.</td>
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<td></td>
<td></td>
<td>b. Provide “end-of-trip” bicycle facilities including showers, lockers, and changing space.</td>
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<td></td>
<td>c. Provide bicycle network that includes linkage to existing Class I or Class II bike lanes.</td>
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<td></td>
<td>d. Provide pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site.</td>
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<td></td>
<td></td>
<td>e. Incorporate on-site transit facility improvements (e.g., pedestrian shelters, route information, benches, lighting) to coincide with existing or planned transit service.</td>
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<td></td>
<td><strong>f. Provide pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements that reduce motor vehicle speeds and encourage pedestrian and bicycle trips.</strong></td>
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<td><strong>g. Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.</strong></td>
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<td><strong>h. Provide a mix of onsite land uses, proximate to existing or planned transit facilities.</strong></td>
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<td></td>
<td><strong>i. Install Energy-Star rated roofing materials.</strong></td>
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<td><strong>j. Provide shade (within fifteen years) and/or use light-colored/high-albedo materials (reflectance of at least 0.3) and/or open grid pavement for at least 30 percent of the site's non-roof impervious surfaces, including parking lots, walkways, plazas, etc.; or, place a minimum of 50 percent of parking spaces underground or covered by</strong></td>
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<td>4.4-5 Exposure of sensitive receptors to toxic air contaminants.</td>
<td>4.4-5(a) Sensitive land (i.e., the proposed medical center and residential dwelling units) uses shall not be located in an area that exceeds the SMAQMD screening criteria for cancer risks associated with toxic air contaminants. Based on SMAQMD’s current screening methodology, if structured parking; or, use an open-grid pavement system (less than 50 percent impervious) for a minimum of 50 percent of the parking lot area. k. Incorporate landscaping and/or sun screens to reduce energy use. Deciduous trees should be utilized for building shading to increase solar heating during the winter months.</td>
<td>SMAQMD Community Development Department</td>
<td>Health-risk assessment shall be prepared prior to approval of a site plan, if sensitive land uses are located within 200 feet of the near-</td>
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The project applicant shall implement the emission reduction strategies contained in the endorsed Air Quality Mitigation Plan. Documentation confirming implementation of the Air Quality Mitigation Plan shall be provided to the SMAQMD and the City prior to the issuance of occupancy permits.
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<td>proposed sensitive receptors are located within 200 feet of Interstate 5, a more detailed assessment of potential health risks shall be required. If sensitive land uses are proposed within 200 feet of the near-travel-lane of Interstate 5, the project applicant shall coordinate with the SMAQMD and the City of Sacramento Community Development Department to conduct a health-risk analysis. The health-risk analysis shall be prepared in accordance with SMAQMD’s Recommended Protocol For Evaluating The Location Of Sensitive Land Uses Adjacent To Major Roadways prior to the approval of a site plan.</td>
<td>SMAQMD</td>
<td>travel-lane of Interstate 5</td>
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<tr>
<td>4.4-5(b)</td>
<td>The project applicant shall plant vegetation (e.g., trees) between proposed on-site sensitive land uses and the I-5 corridor, the type and location to be determined in consultation with SMAQMD.</td>
<td>SMAQMD Community Development Department</td>
<td>Prior to occupancy of phases containing sensitive receptors</td>
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<td>4.4-9</td>
<td>Cumulative contribution to regional air quality conditions (Construction and Operation).</td>
<td>SMAQMD</td>
<td>Prior to the issuance of each grading permit</td>
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<td>4.4-9(a)</td>
<td>Prior to the issuance of each grading permit, the City of Sacramento shall coordinate with the SMAQMD and SACOG to ensure that increases or decreases in VMT attributable to the proposed project are accounted for</td>
<td>SACOG Community Development</td>
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<td>in the VMT calculations used for the development of regional emissions inventories.</td>
<td>Department</td>
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<td>4.4-9(b)</td>
<td>Implement Mitigation Measures 4.4-1(a-d), 4.4-2, and 4.4-3.</td>
<td>See Mitigation Measures 4.4-1(a-d), 4.4-2, and 4.4-3</td>
<td>See Mitigation Measures 4.4-1(a-d), 4.4-2, and 4.4-3</td>
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<tr>
<td>4.5-1</td>
<td>Exposure of people and structures to flood hazards on the project site.</td>
<td>4.5-1(a) Construction and operation of the Natomas Crossing project shall not commence prior to recertification of the Natomas levees by the SAFCA and FEMA, and the subsequent removal of Natomas Basin from the 100-year floodplain and associated flood zone redesignation; or until FEMA redesignates the Natomas Basin with a flood zone designation that would permit development of the proposed project.</td>
<td>FEMA US Army Corps of Engineers Community Development Department</td>
<td>Prior to issuance of building permits</td>
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<td>4.5-1(b) The project applicant shall participate in a funding mechanism such as an assessment district established by SAFCA and/or the City for the purpose of implementing measures that would provide no less than 100-year flood protection including the North Natomas Area.</td>
<td>FEMA US Army Corps of Engineers Community Development Department</td>
<td>Prior to issuance of building permits</td>
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or for that portion of the Natomas Basin requiring re-certification for 100-year flood protection including the Project site provided that such funding mechanism is (i) based on a nexus study; (ii) is regional in nature; (iii) is proportionate; (iv) complies with all applicable laws and ordinances; and (3) the requirements of the applicable FEMA zone and corresponding requirements under the City of Sacramento’s Floodplain Ordinance shall be satisfied prior to the issuance of building permits for the project. Any future homeowners within the floodzone shall maintain federal flood insurance, as required under the applicable FEMA and City of Sacramento Floodplain Management Ordinance regulations.

The above measures shall terminate upon the first recertification of the levees by the U.S. Army Corps of Engineers.

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<td>or for that portion of the Natomas Basin requiring re-certification for 100-year flood protection including the Project site provided that such funding mechanism is (i) based on a nexus study; (ii) is regional in nature; (iii) is proportionate; (iv) complies with all applicable laws and ordinances; and (3) the requirements of the applicable FEMA zone and corresponding requirements under the City of Sacramento’s Floodplain Ordinance shall be satisfied prior to the issuance of building permits for the project. Any future homeowners within the floodzone shall maintain federal flood insurance, as required under the applicable FEMA and City of Sacramento Floodplain Management Ordinance regulations. The above measures shall terminate upon the first recertification of the levees by the U.S. Army Corps of Engineers.</td>
<td>Department</td>
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### Initial Study

3. Seismicity, Soils, and Geology

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<tr>
<td>MM-1</td>
<td>Prior to issuance of grading permits, final foundation investigations shall be performed for each commercial lot, in order to evaluate specific soil</td>
<td>City Engineer</td>
<td>Prior to issuance of grading permits</td>
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<td>conditions at each structure location and to analyze support conditions based on anticipated structural loads and configurations. The final foundation investigations shall provide information about specific site preparation, including chemical treatment types and procedures, and foundation, floor support and pavement section recommendations. The final foundation investigations shall be submitted for the review and approval of the City Engineer to ensure that the proposed project implements all recommendations in the investigations.</td>
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7. Biological Resources

Impacts to endangered, threatened or rare species or their habitats (including, but not limited to plants, fish, insects, animals and birds).

**MM-2** Prior to and within 14 days of site disturbance, pre-construction surveys for special-status species shall be conducted by a qualified biologist retained by the project applicant and approved by the Community Development Department. Should any special-status species be identified, appropriate measures shall be implemented in compliance with the NBHCP (including implementation of Incidental Take Minimization Measures) for the review and approval of the Planning Director.

Community Development Department

Prior to and within 14 days of site disturbance
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| 14. Cultural Resources | Disturbance of paleontological, archaeological, or historical resources, or potentially causing a physical change which would affect unique ethnic cultural values. | **MM-3**  
In the event that any prehistoric subsurface archeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, animal bone, obsidian and/or mortars are discovered during construction related earth-moving activities, all work within 100 feet of the resource shall be halted, and the City shall consult with a qualified archeologist, representatives of the City and the qualified archeologist shall coordinate to determine the appropriate course of action. All significant cultural materials recovered shall be subject to scientific analysis and professional museum curation. In addition, a report shall be prepared by the qualified archeologist according to current professional standards. | Community Development Department | During construction            |                              |
|               |                                                                        | **MM-4**  
If a Native American site is discovered, the evaluation process shall include consultation with the appropriate Native American representatives.  
If a Native American archeologist, | Community Development Department | During construction            |                              |
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<td>ethnographic, or spiritual resources are discovered, all identification and treatment shall be conducted by qualified archeologists, who are certified by the Society of Professional Archeologists (SOPA) and/or meet the federal standards as stated in the Code of Federal Regulations (36 CFR 61), and Native American representatives, who are approved by the local Native American community as scholars of the cultural traditions.</td>
<td>Community Development Department</td>
<td>During construction</td>
<td></td>
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<tr>
<td>MM-5</td>
<td>If a human bone or bone of unknown origin is found during construction, all work shall stop within 100 feet of the find, and the County Coroner</td>
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In the event that no such Native American is available, persons who represent tribal governments and/or organizations in the locale in which resources could be affected shall be consulted. If historic archeological sites are involved, all identified treatment is to be carried out qualified historical archeologists, who shall meet either Register of Professional Archeologists (RPA), or 36 CFR 61 requirements.
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<td>shall be contacted immediately. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission, who shall notify the person most likely believed to be a descendant. The most likely descendant shall work with the contractor to develop a program for re-internment of the human remains and any associated artifacts. No additional work is to take place within the immediate vicinity of the find until the identified appropriate actions have taken place.</td>
<td>County Coroner Native American Heritage Commission (if remains are determined to be Native American)</td>
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Natomas Crossing
Regional Retail and Medical Complex
Air Quality Mitigation Plan

March 1, 2009
Introduction

The proposed Natomas Crossing Regional Retail and Medical Complex project ("Project") is located in the North Natomas community of the City of Sacramento, and as such, falls under the local air quality jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). The Project will include the development of two regional retail projects, as well as, a hospital and medical office complex.

The Project is subject to review under the California Environmental Quality Act (CEQA), which, in this case, requires the City of Sacramento, as lead agency, to prepare an Environmental Impact Report (EIR). In the EIR, the City must assess whether this Project has significant air pollutant emissions impacts. If emissions impacts are significant, based upon the SMAQMD’s adopted thresholds of significance, then an Air Quality Mitigation Plan (AQMP), consistent with the SMAQMD CEQA Guidelines, must be prepared to address these significant impacts.

The Project will cause both direct and indirect air quality impacts during its construction and operational phases. This analysis assumes that these air emissions impacts associated with the Project will be found to be significant in the EIR. The AQMP addresses the operational impacts by proposing that air quality impact mitigation measures to be applied to the Project. The AQMP also specifies the measures that will be applied to address the potentially significant impact of regional ozone precursor emissions, a cumulative impact. These measures are necessary for the Project to meet the requirements of CEQA and to meet regional air quality goals.

This AQMP describes the Project design features and mitigation measures that would be implemented to reduce Project-generated operational emissions of ozone precursors (reactive organic gases [ROG] and oxides of nitrogen [NOx]) by 15% from the base case scenario assuming full trip generation. This AQMP is consistent with the methodologies presented in SMAQMD’s Recommended Guidance for Land Use Emission Reductions, Version 2.4 as updated August 15, 2007.
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PROJECT LOCATION AND DESCRIPTION

PROJECT LOCATION

The Project site is located between Interstate 5 and East Commerce Way, within the North Natomas community of the City of Sacramento (See Figure 1 – Project Location Map). It consists of 36.2 net acres north of Arena Boulevard (referred to as Quadrant B), and 83.6 net acres south of Arena Boulevard referred to as Quadrant C (47.2 net acres) and Quadrant D (36.4 net acres). The Project site comprises the majority of the Natomas Crossing – Alleghany Area #3 PUD, which consists of Quadrants A-D (see Figure 2, Natomas Crossing PUD Map). The Project is further identified by Sacramento County Assessor’s Parcel Numbers (APNs) 225-0070-113, 225-0070-115, 225-0140-065 & 067, 225-0150-043, 053 & 054, 225-0180-059, 225-0310-026.

PROJECT DESCRIPTION

QUADRANT B

The southern portion of Quadrant B will be rezoned from Employment Center and Commercial to Shopping Center to allow for the future development of regional retail space within the range of 309,276 to 463,914 square feet.

Site plan details are not available as only program-level land use entitlements are being pursued at this time.

QUADRANT C

The 47.2 acre Quadrant C portion of the Project is proposed for both retail and office development. More specifically, Quadrant C will have approximately 404,580 square feet of regional retail uses and 200,000 square feet of office uses. One large retail pad is proposed in the northern portion of Quadrant C, consisting of a 137,933 square foot large format retail pad with an attached 31,179 square foot garden center. The balance of Quadrant C would include a total of 20 medium and small sized retail pads. Primary access to this portion of the Project site would be provided via three entrances along East Commerce Way and a right-in only from Arena Boulevard (See Figure 3 – Quadrant C Site Plan).

QUADRANT D

Approximately 600,000 square feet of the development on Quadrant D is proposed for hospital use, and an additional 600,000 square feet are proposed for medical office
uses (See Figure 3-9). The northeastern portion of the hospital building (i.e., side closest to East Commerce Way) would consist of five (5) stories, and northwestern portion of the building would consist of three (3) stories.

Per the current Conceptual Hospital Site Plan, two above-ground parking structures would ultimately be developed. It should be noted that both of these parking structures would not be needed during the early phase(s) of the build-out of Quadrant D; therefore, it is anticipated that the structures would be completed commensurate with the phase of the Project necessitating its construction.

Three Project driveways are proposed along East Commerce Way. Internal circulation will be provided primarily via a “ring road” around the inside perimeter of Quadrant D (See Figure 4 – Quadrant D Site Plan)

PROJECT OBJECTIVES

The objectives for the proposed Project are as follows:

- To construct retail development on property adjacent to Interstate 5.
- To promote the development of regional commercial uses to meet current commercial needs and demand.
- To foster economic and employment opportunities within the City of Sacramento through the development of vacant property within greater northern Sacramento area.
- To provide the necessary circulation and infrastructure improvements to accommodate development of the property.
- To promote strong architecture and design features that are compatible with adjacent uses and provide a unique identity for the project as a whole.
- To provide essential healthcare and emergency room services options to Natomas and the greater region.
- To develop a project that will ultimately provide a mix of uses, including residential, hotel, office, medical, and retail, that are a logical extension of adjacent uses.
FIGURE 1 – PROJECT LOCATION MAP
FIGURE 2 - NATOMAS CROSSING PUD
FIGURE 3 - QUADRANT C SITE PLAN
PURPOSE OF THE AIR QUALITY MITIGATION PLAN

CEQA requires that EIRs identify and evaluate any significant environmental impacts of a proposed Project. The analysis of significant effects must include both direct project impacts and indirect impacts. The analysis must then describe feasible measures that could minimize any significant adverse impacts. To assist in the evaluation of air quality impacts, the SMAQMD developed their Guide to Air Quality Assessment in Sacramento County (CEQA Guide), dated July 2004. The CEQA Guide outlines a methodology for calculating project emissions whereby a project is divided into separate construction and operational phases. For each phase, the CEQA Guide establishes significance thresholds related to elevated regional ambient ozone concentrations, a cumulative impact. In the CEQA Process, project operation emissions are calculated and impacts are determined in the Draft EIR (DEIR). Project emissions determined in the DEIR are then compared to the significance thresholds set forth in the CEQA Guide. The CEQA Guide requires preparation of an AQMP that incorporates mitigation measures to address operational emissions impacts as reported in the DEIR that are determined to be significant under the CEQA Guide thresholds of significance.

The Natomas Crossing Project consists of the development of approximately 119.8 net acres of Employment Center and commercial zoned land into a combination of retail, office, and medical center/hospital uses. Considering the proposed development, operational emissions will be predominantly indirect in nature, resulting from vehicle exhaust emissions related to commuter vehicles, delivery vehicles, and municipal service vehicles. For the purposes of the AQMP, the Project’s operation impacts are assumed to exceed the SMAQMD significance thresholds of regional ozone formation, even after application of the mitigation measures described herein.

Recognizing that indirect emissions from land use development projects can significantly impact the region’s air quality, the County of Sacramento adopted a land use review requirement (Policy AQ-15) for the Air Quality Element in the General Plan. Several of the incorporated areas within Sacramento County have also adopted air quality elements to their General Plan Update. The SMAQMD’s land use review policy requires that projects with significant operational air quality impacts (related to regional ozone) reduce direct and indirect emissions by a minimum of 15% by selecting and implementing mitigation measures form a list of SMAQMD recommendations. The SMAQMD has further determined that this 15% reduction in emissions will satisfy the “all feasible measures” mitigation requirement under CEQA for operational impacts for all jurisdictions within Sacramento County.

To assist in documenting, quantifying, and monitoring the mitigation measures selected by the Project proponent, the SMAQMD has prescribed that the selected operation mitigation measures be explained in the context of the AQMP. The AQMP is a stand-alone document separate from other documents or plans required by CEQA process, and before certification of the EIR by the lead agency, the SMAQMD independently endorses the AQMP via a letter. The endorsed AQMP is then referenced in the EIR as an air quality mitigation measure, appended to the EIR, and at the discretion of the lead agency, may be referenced as a separate condition of approval.
DESCRIPTION OF SCALING METHODOLOGY

The SMAQMD CEQA Guide includes a list of potential mitigation measures approved by the SMAQMD. These measures are related to bicycle/pedestrian use, transit, parking, commercial and residential development design, building design, and commuting. Each measure has been assigned a land use type for which credit may be claimed, and a point value. The land use types include retail, office, and hospital. Each point or fraction thereof associated with a particular measure corresponds to an equal percentage of emission reductions. Mixed-use projects claiming credit for a strictly commercial or residential measure must scale the credit claimed to that fraction of the project that is commercial or residential. Therefore, it is necessary to calculate the fraction of credit that is claimable for each use type, referred to as “scaling.” The SMAQMD guidance document identifies three methodologies for scaling, based on: (1) trip generation; (2) specific use by square footage; and (3) specific use by percentage of net lot area (SMAQMD 2007).

Scaling for the proposed Project was conducted based on the trip-generation rates assigned to the proposed land uses, obtained from the traffic analysis prepared for the Project. The total point value of selected mitigation measures was scaled based on the amount of the trip generation associated with the specific land use type to which the measure applies, based on a percentage of the total trip generation associated with the development of proposed land uses located on Quads C and D, as well as the retail portion of Quad B. The calculated percentages are shown in the table below.

<table>
<thead>
<tr>
<th>Quad</th>
<th>Land Use Designation</th>
<th>Quantity (Square Feet)</th>
<th>Daily Trip Generation</th>
<th>Percentage of Total Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>Retail</td>
<td>426,000</td>
<td>17,420</td>
<td>25.3%</td>
</tr>
<tr>
<td>C</td>
<td>Office</td>
<td>200,000</td>
<td>2,275</td>
<td>3.3%</td>
</tr>
<tr>
<td>C</td>
<td>Retail</td>
<td>393,200</td>
<td>16,536</td>
<td>24.0%</td>
</tr>
<tr>
<td>D</td>
<td>Hospital</td>
<td>600,000</td>
<td>8,270</td>
<td>12.0%</td>
</tr>
<tr>
<td></td>
<td>Medical Office</td>
<td>600,000</td>
<td>24,319</td>
<td>35.3%</td>
</tr>
<tr>
<td></td>
<td><strong>Total Project-Generated Trips:</strong></td>
<td><strong>68,820</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Scaling methodology was based on trip-generation of proposed land uses as a percentage of total Project-generated trips. Trip-generation rates were obtained from the traffic analysis prepared for this Project (DKS 2008). Percentages may not sum due to rounding.

**References for inclusion in the plan:**
<table>
<thead>
<tr>
<th>Measure #</th>
<th>Title</th>
<th>Use</th>
<th>Description</th>
<th>Mitigation Points</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Bicycle/Pedestrian/Transit Measures</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>Bike parking</td>
<td>C,M</td>
<td>Non-residential projects provide plentiful short-term and long-term bicycle parking facilities to meet peak season maximum demand</td>
<td>0.625</td>
</tr>
<tr>
<td>2</td>
<td>End of trip facilities</td>
<td>C,M</td>
<td>Non-residential projects provide “end-of-trip” facilities including showers, lockers, and changing space</td>
<td>0.296</td>
</tr>
<tr>
<td>4</td>
<td>Proximity to bike path/bike lanes</td>
<td>R,C,M</td>
<td>Entire project is located within 1/2 mile of an existing Class I or Class II bike lane and project design includes a comparable network that connects the project uses to the existing offsite facility</td>
<td>0.625</td>
</tr>
<tr>
<td>5</td>
<td>Pedestrian network</td>
<td>R,C,M</td>
<td>The project provides a pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site.</td>
<td>1.0</td>
</tr>
<tr>
<td>6</td>
<td>Pedestrian barriers minimized</td>
<td>R,C,M</td>
<td>Site design and building placement minimize barriers to pedestrian access and interconnectivity. Physical barriers such as walls, berms, landscaping, and slopes between residential and non-residential uses that impede bicycle or pedestrian circulation are eliminated</td>
<td>1.0</td>
</tr>
<tr>
<td></td>
<td>Description</td>
<td>Details</td>
<td>Rating</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>-----------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Bus shelter for planned transit service</td>
<td>Project provides transit stops with safe and convenient bicycle/pedestrian access. Project provides essential transit stop improvements (i.e., shelters, route information, benches, and lighting) in anticipation of future transit service.</td>
<td>0.25</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Traffic calming</td>
<td>Project design includes pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways are designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips by featuring traffic calming features.</td>
<td>1.0</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Pedestrian pathway through parking</td>
<td>Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.</td>
<td>0.5</td>
<td></td>
</tr>
<tr>
<td>23</td>
<td>Suburban mixed-use</td>
<td>Have at least three of the following on site and/or offsite within ¼ mile: Residential Development, Retail Development, Park, Open Space, or Office.</td>
<td>3.0</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>Energy Star roof</td>
<td>Install Energy Star labeled roof materials.</td>
<td>1.0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Non-roof surfaces</td>
<td>Provide shade (within 15 years) and/or use light-colored/high-albedo materials (reflectance of at least 0.3) and/or open grid pavement for at least 30% of the site’s non-roof impervious surfaces, including parking lots, walkways, plazas, etc.; OR place a minimum of 50% of parking spaces underground or covered by structured parking; OR use an open-grid pavement system (less than 50% impervious) for a minimum of 50% of the parking lot area. Unshaded parking lot areas, driveways, fire lanes, and other paved areas have a minimum albedo of .3 or greater</td>
<td>R,C,M</td>
<td>1.0</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>33</td>
<td>Transportation Management Association membership</td>
<td>Include permanent TMA membership and funding requirement. Funding to be provided by Community Facilities District or County Service Area or other non-revocable funding mechanism.</td>
<td>R,C,M</td>
<td>5.0</td>
</tr>
<tr>
<td>99</td>
<td>Preferred Tree Mix</td>
<td>Select trees which are beneficial to air quality and do not emit ozone precursors</td>
<td>R,C,M</td>
<td>0.5</td>
</tr>
</tbody>
</table>

**Points Summary**

| Total Point Value | 15.796 |
MEASURE DETAILS

MEASURE 1 – BIKE PARKING

Non-residential projects provide plentiful short-term and long term bicycle parking facilities to meet peak season maximum demand.

0.625 Points

SMAQMD’s CEQA Guide states that short-term facilities shall provide a minimum ratio of one bike rack space per 20 vehicle spaces. Long-term facilities shall provide a minimum ratio of one long-term bicycle storage space per 20 employee parking spaces. All bicycle parking facilities will be weather-protected, secure, and free of access restrictions that could impede bicycle storage. All facilities shall comply with the standards outlined in the California Department of Transportation (Caltrans) Pedestrian and Bicycle Facilities in California reference document.

Since the Natomas Crossing Project mostly consists of program-level land use entitlements, specifics as to employee counts and parking spaces have not yet been determined. As a result, the findings will be largely generalized, but the Measure’s requirements will be committed to. When the specifics of employee counts and parking spaces become available, the appropriate ratios for bicycle parking will be implemented. However, a more detailed analysis and exhibits specific to the retail portion of Quadrant C are available. The findings are discussed below:

The employee/acre amount assumptions from the North Natomas Community Plan have been utilized and the SMAQMD ratios have been applied to the Project in order to provide an estimate as to the number of long-term bicycle storage facilities. Since NNCP employee estimates are for total full-time employees, a factor of 30% of the total has been applied to reflect an estimated amount of employees/shift at any time. As actual information regarding employees and work-shift sizes become available, the true amounts will be utilized. The amounts are summarized in the following table.
Long-Term Bicycle Storage Facilities

<table>
<thead>
<tr>
<th>Project Component</th>
<th>Land Use/Zoning</th>
<th>Acreage</th>
<th>NNCP Total Employees/Acre</th>
<th>Estimated Employees/Shift (Total Employees x 30%)</th>
<th>Estimated Bicycle Storage facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quadrant B</td>
<td>Retail / SC</td>
<td>36.2</td>
<td>30 Emp./Acre</td>
<td>1,086 x .3 = 326</td>
<td>16</td>
</tr>
<tr>
<td>Quadrant C</td>
<td>Retail / SC</td>
<td>38.5</td>
<td>30 Emp./Acre</td>
<td>1,155 x .3 = 347</td>
<td>17</td>
</tr>
<tr>
<td></td>
<td>Office / EC-50</td>
<td>8.7</td>
<td>50 Emp./Acre</td>
<td>435 x .3 = 131</td>
<td>7</td>
</tr>
<tr>
<td>Quadrant D</td>
<td>Hospital / EC-50</td>
<td>36.4</td>
<td>50 Emp./Acre</td>
<td>1,820 x .3 = 546</td>
<td>27</td>
</tr>
</tbody>
</table>

As previously mentioned, much of the information has been generalized due to the preliminary stage of the entitlement process. More detailed analysis and mitigation specifics for short term bicycle parking will be provided at the time of project-level review and issuance of use permits for the various components of the Project. However, detailed site plans are available for the Quadrant C retail component of the Project, as discussed below.

At present, it is estimated that the Quadrant C retail portion of the Project will accommodate 1,916 parking spaces. By applying a ratio of 1 short term bicycle facility per 20 vehicular parking places, the Project will require an estimated 96 short term bicycle spaces. This amount is a maximum amount required and may in fact be offset by the amount of employee bicycle parking required, to avoid “double-counting” for required parking. Figure 5, on the following page provides an exhibit of the proposed short and long-term parking locations in the Quadrant C retail portion of the Project.

Also, as required by Mitigation Measure 4.4-3 in the DEIR, the Project applicant shall implement the following:

a) Provide on-site short-term and long-term bicycle parking per the ratios set forth in SMAQMD’s *Recommended Guidance for Land Use Emissions Reduction* (August, 2007) and as applied in the Natomas Crossing Regional Retail and Medical Complex Air Quality Mitigation Plan.
Figure 5 – Bike/Pedestrian Connectivity Exhibit (Quadrant C)
MEASURE 2 – END OF TRIP FACILITIES

Non-residential Projects “end of trip” facilities including showers, lockers, and changing space.

0.296 Points (Scaled for Hospital only)

SMAQMD’s CEQA Guide states that facilities shall be provided in the following ratio: four clothes lockers and one shower for every 80 employee parking spaces. For projects with 160 or more employee parking spaces, separate facilities are required for each gender. This requirement will only be applied to the Quadrant D (Hospital) portion of the Project at this time, and as a result, the points have been scaled for this analysis.

Applying this ratio to the Quadrant D portion of the Project site, and using the generalized assumption of 546 anticipated new employees per shift at build-out, the Project shall require the installation of 28 clothes lockers and 7 shower facilities at build-out. Since there would be more than 160 employee parking spaces, separate facilities shall be required for each gender. Due to the nature of employment and facilities at hospitals, the amounts of lockers and shower facilities and anticipated to well exceed the amounts estimated above.

As more information becomes available regarding the opportunity for end of trip facilities in the office/retail portions of the Project, more points may become available.

In addition, as required by Mitigation Measure 4.4-3 in the DEIR, the Project applicant shall implement the following:

b) Provide “end-of-trip” bicycle facilities including showers, lockers, and changing space.
MEASURE 4 – PROXIMITY TO BIKE PATH / BIKE LANE

Entire project is located within ½ mile of an existing Class I or Class II bike lane and project design includes an internal network that connects the project uses to the existing offsite facility.

0.625 Points

SMAQMD’s CEQA Guide states that project design includes a designated bicycle route connecting all units, on-site bicycle parking facilities, off-site bicycle facilities, site entrances, and primary building entrances to existing Class I or Class II bike lane(s) within ½ mile. Bicycle routes connect to all streets contiguous with project site. Bicycle routes have minimum conflicts with automobile parking and circulation facilities. All streets internal to the project wider than 75 feet have Class II bicycle lanes on both sides. Facilities shall comply with standards outlined in the Caltrans Pedestrian and Bicycle Facilities in California reference document.

Bicycle lanes exist near the Project site and throughout the Project area. Class II (on-street with signing and striping) bike lanes are provided along East Commerce Way, which fronts the entirety of the Project site. The bike lanes either presently exist (north of Arena Boulevard) or will be required for construction concurrent with the Project (south of Arena Boulevard). A Class I bike path also is planned within the 100’ freeway landscape buffer, west and adjacent to the entirety of the Project site. Thus, the Project is within ½ mile of bike facilities, and the Project will be designed for direct accessibility by and to these facilities.

Figure 5 depicts both the Class II bike lane on East Commerce way and the proposed Class I off-street bike path in the freeway buffer, as they relate to the Quadrant C retail Project. Such orientation and proximity is consistent throughout the entirety of the Project site.

In addition, as required by Mitigation Measure 4.4-3 in the DEIR, the Project applicant shall implement the following:

c) Provide bicycle network that includes linkage to existing Class I or Class II bike lanes.
MEASURE 5 – PEDESTRIAN NETWORK

The project provides a pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site.

1.0 Points

SMAQMD’s CEQA Guide states that project design shall include a designated pedestrian route interconnecting all internal uses, site entrances, primary building entrances, public facilities, and adjacent uses to existing external pedestrian facilities and streets. The route shall have minimal conflict with parking and automobile circulation facilities. Streets (with the exception of alleys) within the project have sidewalks on both sides. All sidewalks internal and adjacent to the project site are a minimum of 5 feet wide and feature vertical curbs. Pedestrian facilities and improvements such as grade separation, wider sidewalks, and traffic calming are implemented wherever feasible to minimize pedestrian barriers. All site entrances provide pedestrian access, and, as mentioned above, crosswalks are generally provided at signalized intersections and sidewalks exist along the frontage of most developed properties. Facilities shall comply with the Caltrans Pedestrian and Bicycle Facilities in California technical reference document.

As previously mentioned, due to the preliminary nature of the entitlements on much of the Project, the applicant will commit to the terms of SMAQMD’s CEQA Guide for the pedestrian access network; however, specific details of how these will apply to the Quadrants B and D are not currently available. Quadrant C specific entitlements and design are consistent with the Measure and are exhibited in Figure 5. All signalized intersections, whether internal or external to the site will provide crosswalks which tie to the Project’s pedestrian route networks.

In addition, as required by Mitigation Measure 4.4-3 in the DEIR, the Project applicant shall implement the following:

d) Provide pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site.
MEASURE 6 – PEDESTRIAN BARRIERS MINIMIZED

Site Design and building placement minimize barriers to pedestrian access and interconnectivity. Physical barriers such as walls, berms, landscaping and slopes between residential and non residential uses that impede bicycle or pedestrian circulation are eliminated.

1.0 Points

SMAQMD’s CEQA Guide states that barriers to pedestrian access of neighboring facilities and sites shall be minimized. This measure is not meant to prevent the limited use of barriers to ensure public safety by prohibiting access to hazardous areas.

The Project is/will be designed to maximize bicycle and pedestrian connectivity between residential uses and commercial/retail land uses. Any physical barrier that may impede pedestrian or bicycle circulation, such as berms, gates, walls, or other structures will not be constructed.

By way of example, both Figure 5 and Figure 7 show conceptual depictions of how the office and retail uses will coexist in Quadrant C. Pedestrian linkage on and offsite will be maximized and no barriers to pedestrian circulation exist. Pedestrian linkages for Quadrants B and D will be similar to Quadrant C and will comply with SMAQMD’s measure.
MEASURE 8 - BUS SHELTER FOR PLANNED TRANSIT SERVICE

Project provides transit stops with safe and convenient bicycle/pedestrian access. Project provides essential transit stop improvements (i.e. shelters, route information, benches, and lighting) in anticipation of future transit service.

0.25 Points

The North Natomas Community Plan indicates East Commerce Way, Arena Boulevard, and Natomas Crossing Drive will serve as intra-community bus corridors in the future. It is anticipated that these bus-lines would tie into the regional lines currently serving the Natomas community as well as the future light-rail lines.

As previously mentioned, East Commerce Way fronts the entirety of the Project site. Additionally, the Project site is bifurcated by Arena Boulevard and Natomas Crossing Boulevard. As a result, bus access/availability will be plentiful in the future.

Public transit facilities will be incorporated into the Project design as recommended by the City of Sacramento and Regional Transit. Additionally, the timing of such installation will be as requested by the overseeing agency. Figure 5 depicts an example of the bike/pedestrian connectivity to be provided in Quadrant C, and expected throughout the entirety of the Project.

In addition, Mitigation Measure 4.4-3 in the DEIR requires that the applicant implement the following:

   e) Incorporate on-site transit facility improvements (e.g., pedestrian shelters, route information, benches, lighting) to coincide with existing or planned transit service.

MEASURE 9 – TRAFFIC CALMING

Project design includes pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements. Roadways are designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips by featuring traffic calming features.

1.0 Points

Per the requirements of this SMAQMD implementation measure, all sidewalks internal and adjacent to the projects site are a minimum of five feet wide and will feature vertical curbs. All facilities will comply with the standards described in the California Department of Transportation “Pedestrian and Bicycle Facilities in California” technical reference document.

All of the intersections external/adjacent to the Project site will feature one or more of the following pedestrian safety/traffic calming design techniques as listed in the SMAQMD implementation measure. Marked Crosswalks; Count-down signal timers; Speed tables; Raised crosswalks; raised intersections; Median islands; Tight corner radii; and Roundabouts are some suggested measures.
One, all, or other suggested traffic calming measures listed above will be utilized throughout the Project. Additionally, due to the commercial nature of the Project, specific pedestrian corridors designed to safely move pedestrian and bicycle traffic throughout the Project will implement similar design techniques.

Further, Mitigation Measure 4.4-3 in the DEIR requires that the applicant implement the following:

f) Provide pedestrian/bicycle safety and traffic calming measures in excess of jurisdiction requirements that reduce motor vehicle speeds and encourage pedestrian and bicycle trips.

MEASURE 13 – PEDESTRIAN PATHWAY THROUGH PARKING

Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.

0.5 Points

SMAQMD’s CEQA Guide states that the pathway must connect to all transit facilities, internal or adjacent to the Project site.

Pedestrian connectivity will be maximized between uses within the Project site as well as clearly delineated to future transit locations. Pathways will be clearly marked and shaded to draw clear paths from buildings to transit stops fronting the site. Any physical barrier that may impede pedestrian or bicycle circulation, such as berms, gates, walls, or other structures would not be constructed.

Figure 5 shows an example of the extensive pedestrian network proposed for Quadrant C. Such linkage will provide clear paths from buildings to future transit stops and bike storage facilities located throughout the Project. Figure 6 depicts some the plazas, pavement treatments to accentuate pedestrian paths, pedestrian street crossings, and site furniture proposed to define pedestrian paths and encourage their use.

In addition, Mitigation Measure 4.4-3 in the DEIR requires that the Project applicant implement the following:

g) Provide a parking lot design that includes clearly marked and shaded pedestrian pathways between transit facilities and building entrances.

h) Orient project toward existing or planned transit, bicycle, or pedestrian corridors. Minimize setback distances of buildings.
MEASURE 23 – SUBURBAN MIXED-USE

Have at least three of the following on site and/or offsite within ¼ mile; Residential Development, Retail Development, Park, Open Space, Or Office.

3.0 Points

The Natomas Crossing Project benefits from unique diversity in adjacent and nearby land uses. The entirety of the Project site is bordered adjacent and to the west by the 100’ freeway landscape buffer. This buffer is considered open space by the City of Sacramento and is/will be landscaped heavily with trees, shrubs, ground cover and a pedestrian/bicycle path. The Project will be designed to tie into the open space at multiple locations. Additionally, significant medium and high density residential uses run almost the entirety of the Project site, adjacent and immediately east along East Commerce Way. The opportunity for a live/work environment is maximized. Existing and proposed office uses are in the immediate vicinity of Quadrant B, and the proposed office use in the southern portion of Quadrant C will continue to provide diversity in uses.

As a result, the entirety of the Project site will be within ¼ mile of all listed development types.

In addition, Mitigation Measure 4.4-3 in the DEIR requires that the Project applicant implement the following:

i) Provide a mix of onsite land uses, proximate to existing or planned transit facilities.

MEASURE 27 – ENERGY STAR ROOF

Install Energy Star labeled roof materials

1.0 Points

Energy Star qualified roof products reflect more of the sun’s rays, decreasing the amount of heat transferred into a building. Prior to construction, information will be provided demonstrating compliance with the measures requirements including, but not limited to, specifications of the roofing products and documentation confirming the products to be utilized are Energy Star Certified and meet ATSM high emissivity requirements.

In addition, Mitigation Measure 4.4-3 in the DEIR requires that the Project applicant implement the following:

j) Install Energy-Star rated roofing materials.
MEASURE 31 – NON-ROOF SURFACES

Provide shade (within 15 years) and/or use light-colored/high-albedo materials (reflectance of at least 0.3) and/or open grid pavement for at least 30% of the site’s non-roof impervious surfaces, including parking lots, walkways, plazas, etc.; or place a minimum of 50% of parking spaces underground or covered by structured parking; or use an open grid pavement system (less than 50% impervious) for a minimum of 50% of the parking lot area. Unshaded parking lot areas, driveways, fire-lanes, and other paved areas have a minimum albedo of .3 or greater.

1.0 Points

Sacramento City Code requires a minimum of 50% shade coverage for non-roof impervious surfaces. The site specific landscape plan for Quadrant C exhibits a 50% shade coverage ratio.

Further, Mitigation Measure 4.4-3 in the DEIR requires that the Project applicant implement the following:

   k) Provide shade (within five years) and/or use light-colored/high-albedo materials (reflectance of at least 0.3) and/or open grid pavement for at least 30 percent of the site's non-roof impervious surfaces, including parking lots, walkways, plazas, etc.; or, place a minimum of 50 percent of parking spaces underground or covered by structured parking; or, use an open-grid pavement system (less than 50 percent impervious) for a minimum of 50 percent of the parking lot area.

   l) Incorporate landscaping and sun screens to reduce energy use. Deciduous trees should be utilized for building shading to increase solar heating during the winter months. Install sun-shading devices (e.g., screens) or recessed windows on newly proposed buildings.

MEASURE 33 – TRANSPORTATION MANAGEMENT ASSOCIATION MEMBERSHIP

Include permanent TMA membership and funding requirements. Funding to be provided by Community Facilities District (CFD) or County Service Area or other non-revocable funding mechanism.

5.0 Points

The Project is located within the boundaries of the North Natomas Transportation Management Association CFD and is obligated to pay the annual assessments appropriate for the differing land uses.
MEASURE 99 – PREFERRED TREE MIX

Certain types of trees, such as eucalyptus & liquid amber, emit ozone precursors which contributes to ozone (smog) formation. The applicant shall select tree species which are more beneficial for air quality.

0.5 Points

The applicant shall prohibit the use of liquid amber and eucalyptus trees that produce smog-forming compounds (high emission factors for isoprene). See attached Figure 7 – Landscape Exhibit.
FIGURE 7 – LANDSCAPING EXHIBIT
April 27, 2009

Greg Guardino
Alleghany Properties LLC
2150 River Plaza Drive, Suite 155
Sacramento, CA 95833

Subject: Natomas Crossing Regional Retail and Medical Office Complex Air Quality Mitigation Plan
SMAQMD # SAC200400124

Dear Mr. Guardino:

Thank you for submitting the updated version of the Natomas Crossing Air Quality Mitigation Plan n to the Sacramento Metropolitan Air Quality Management District (District) for review.

The District endorses the updated version of the Natomas Crossing Air Quality Mitigation Plan (AQMP) received on March 11, 2009. The District anticipates that implementation of the Mitigation Measures described in the plan will lead to a 15.79 percent or greater reduction in operational emissions from the project. This AQMP is consistent with the Districts Recommended Guidance for Land Use Emission Reductions and is anticipated to reduce the operational emissions associated with the project to a less than significant level.

Please contact me at (916) 874-2694 or jhurley@airquality.org if you have any questions.

Sincerely,

[Signature]
Joseph J. Hurley
Assistant Air Quality Planner Analyst

C: Larry Robinson, Sacramento Metropolitan Air Quality Management District
THE HOYT COMPANY

Transportation  
Traffic Mitigation  
Parking  
Air Quality  
Development & Community Relations

(916) 448-2440
MASTER AQ/TSM PLAN

FOR

AREA 3

Prepared for:

ALLEGHANY PROPERTIES

&

SACRAMENTO CITY PUBLIC WORKS DEPARTMENT
SACRAMENTO CITY PLANNING DEPARTMENT

Prepared by:

THE HOYT COMPANY
(916) 448-2440

November 14, 2001
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1.0 PROJECT DESCRIPTION

Alleghany Properties proposes to develop Area 3, a 298 acre mixed use Planned Unit Development (PUD) in the North Natomas community. The project has campus-style design with a pedestrian spine running through the project and employment centers (3,162,000 s.f.) including office, retail, child-care center, hotel, and service retail (such as a gas station).

Area 3 is bound by Del Paso Road to the north, I-5 to the west, San Juan Road to the south, and Commerce Parkway to the east. Adjacent uses include residential (Gateway West, Parkview, Riverview), commercial/office (Arco Arena, Arena Corporate Center). Actual commercial and retail land uses will be dependent upon market conditions.

A schematic plan for the project is located on page 2.

The design of Area 3 supports the air quality reducing goals described in the North Natomas Community Plan and those of the City of Sacramento:

- Alleghany is designing the project to provide the minimum amount of commercial parking spaces required by the City of Sacramento (1/400 s.f.).

- Providing pedestrian pathways between various land uses and Commerce Way and at the northern end of the development along Del Paso Blvd.

- Parking lots should have clearly delineated pedestrian pathways.

- Area 3 is located on a minor bus corridor. Provisions for placement of bus shelters within public utility easements (PUE) adjacent to public ROW Shelters requirements are 10'W and 20'L.

- A Transportation Coordinator (TC) will be provided for employees (each subsequent project will have a TC provided by the new land owner(s)). This person will have the responsibility for implementing and keeping track of trip reduction programs found in this Plan. The TC will coordinate with the Executive Director of the North Natomas Transportation Management Association to maximize use of available programs.

Alleghany Properties is committed to development standards that promote clean air activities.
2.0 BACKGROUND ON SACRAMENTO AIR QUALITY

Sacramento County is not in compliance with standards set forth in either the Federal or State Clean Air Acts and has the sixth worst air quality in the nation\(^1\). The region must meet federal standards for ozone air pollution by 2005 - or risk losing federal funding. Internal combustion engines in mobile sources such as cars, light-duty and heavy-duty trucks, and off-road vehicles are major sources of ozone (O\(_3\)) precursors. These precursors include reactive organic gases (ROG) and oxides of nitrogen (NOx).

Reducing the number of automobile trips and other air quality impacts resulting from development is an important component of improving the overall air quality in the Sacramento region.

3.0 AQ/TS M PLAN GOAL

To reduce air quality pollution resulting from development in North Natomas, the City of Sacramento and the Sacramento Metropolitan Air Quality Management District require new development in North Natomas to mitigate air pollution and automobile trips related to commercial projects by 50%. The City of Sacramento and the Sacramento Metropolitan Air Quality Management District have developed a listing of different Air Quality Mitigation Measures and City Transportation Systems Management (TSM) measures that when incorporated into new development will reduce air pollutants and automobile trips.

This Master Plan includes measures for trip reduction and also project related air pollutant emission reduction. A 50% reduction in total project air quality emissions and trip reduction is garnered via this Plan as required in the North Natomas Community Plan (50% required for Commercial uses - 35% from TSM measures and 15% from air quality measures; and 20% required for residential - 5% from TSM measures and 15% from air quality measures).

The City of Sacramento and North Natomas Community Plan require an AQ/TS M Plan for major projects:

The property owner of every Major Project shall be required to obtain a Transportation Management Plan (TSM Plan) permit subject to approval by the Planning Director and the Traffic Engineer.... Major Project defined as...any development proposal which is expected to be the primary place of business of 100 or more employees.\(^2\)

\(^1\) Environmental Protection Agency, 2000.
\(^2\) City of Sacramento Zoning Ordinance.
Each non-residential project shall comply with the Citywide Transportation management (TSM) ordinance and a Transportation Management Plan shall be required.³

Individual TSM/AQ Plans for commercial uses will be created and submitted as the project develops. These plans will follow the guidelines set forth in this Master Plan. Through the measures provided in this Master Plan, air quality requirements for the residential uses are satisfied and therefore, additional separate plan(s) for residential uses will not be necessary.

The following Sections provide details of the mitigation measures included in the Area 3 development which support the required 50% mitigation for commercial land uses and 20% for residential land uses.

4.0 TRANSPORTATION COORDINATOR (TC) 0.2% - #57

Area 3 will provide a Transportation Coordinator (for the commercial uses of the project) who will have the primary responsibility for Transportation Systems Management (TSM) issues and for implementing this Plan.

This position will be filled temporarily by:

Name: Mr. Greg Guardino
Address: 2150 River Plaza Dr., Suite #155
Sacramento, CA 95833
Phone: (916) 648-7700

As land is sold, the new property owner(s) will provide transportation coordinators for each individual project. The new land owner(s) will inform the City with the name(s) of the new TC(s). The Transportation Coordinator (TC) will provide the following services and functions in coordination with the North Natomas TMA:

1. Catalog all existing incentives that encourage tenant/employers/residents to develop and fund alternative transportation programs.

2. Develop and maintain liaison with TMA, tenants, employees, neighboring employment centers, and regional ridesharing programs.

3. Coordinate and manage various aspects of the Plan that require periodic update or monitoring such as Guaranteed Ride Home Program registration, carpool registration, parking assignment and enforcement, locker assignment and enforcement and encouraging flextime work schedules.

³ North Natomas Community Plan, May 1994, Pg. 47.
4. Coordinate the transportation needs of the project with other area projects specifically related to alternative modes of transportation such as shuttles or vanpooling.

5. Provide information and resource materials on the full range of transportation choices available.

6. Provide up-to-date transit information when RT implements and modifies service, and whenever appropriate.

7. Provide bicycle information such as bicycle maps, new routes, etc. (available from SACOG Rideshare, the TMA, and Sacramento Area Bicycle Advocates).

8. Coordinate with SACOG Rideshare/TMA and provide personal matching assistance (PMA).

9. Post informational materials specific to commute alternatives within the project.

10. Conduct an annual survey of tenant employee commute methods for the entire development and distribute summarized results to the tenant and to the Sacramento City Public Works as part of the annual report process. (See Expiration of Plan).

11. Evaluate survey results for alternative transportation use and potential.

12. Encourage the tenants to allow flextime and other work schedule adjustments to accommodate their employees’ chosen alternative mode.

The City of Sacramento must be informed of the name and contact information if and when the current TC(s) changes.

5.0 MIXED USE 1.0% - #30

Area 3 is a planned mixed use community with commercial and retail uses such as office, hotel, restaurant, gas station, and a child care center planned with residential development. By providing a mixed use development such as this with jobs, support retail and safe pedestrian/bicycle access, employees and residents will be more likely to walk or bicycle to these uses than to drive.

6.0 BICYCLE/PEDESTRIAN IMPROVEMENTS

6.1 Showers and Lockers 2.0%
Showers
Showers and clothing lockers will be available for employees who wish to change after commuting via alternative transportation. The ratio of showers and lockers will be provided as follows: Two shower and 20 locker facilities for every 250 employees (1 shower and 10 lockers each for men and women). The number of employees within Area 3 is estimated at 8,817 and therefore 70 showers and 700 lockers would be provided (35 showers and 350 lockers each for men and women throughout the project area).

The provision of showers and lockers make it easier for employees to choose to use active forms of commuting such as walking and bicycling because they have the ability to clean up, change clothes and store accessories such as helmets or shoes during the work day.

Showers and clothing lockers will be provided throughout the commercial areas of the project and will be available to all employees.

Bicycle Storage
Having a secure place to store one's bicycle is a concern for those who would like to bicycle to work. Class I lockers, fully enclosed and locked units, provide the optimum storage for bicycles. Class II racks are those that one would chain their bicycle to and are usually in front of building entrances.

Area 3 will provide Class I and Class II bicycle parking throughout the commercial area of the project at a ratio 1 bicycle storage space for every 20 required parking spaces. 50% of the storage spaces will be Class I with the remaining spaces Class II or Class III. Based on 7,905 commercial spaces and 304 residential spaces, 395 storage spaces (198 Class I and 197 Class II) would be provided for the commercial areas and 15 storage spaces for the residential areas.

Bicycle storage facilities will be dispersed throughout Area 3 for maximum, easy access by employees, and visitors/customers. This provision of bicycle storage facilities is intended to encourage employees to commute to work by bicycle, as well as customer/residential travel by bicycle rather than by Single Occupancy Vehicles (SOV).

6.2 Project Located 1/4 Mile of Class I or Class II Bikeway 1.0% - #5
Area 3 is surrounded by existing and proposed bicycle lanes. Please see map on the following page.

Through bike commuting assistance offered by SACOG Rideshare, Area 3 can provide safety and bicycle matching information to residents and employees who bike to work or for recreation.
6.3 Pedestrian Pathways 1.0% - #6

Sidewalks will be constructed within Area 3. To support the campus-style environment, a pedestrian spine will run through the middle of the project, linking commercial and retail uses. Hub areas will be designed along the "spine". Some sidewalks will have additional "buffer" landscaping to separate pedestrians from the roadways. A 12 ft. buffer will be constructed along the freeway including pedestrian path and landscaping (bushes and tree cluster areas linking to hub areas).

6.4 Separate Bicycle/Pedestrian Path 2.0% - #32

Existing and proposed on and off-street bikeways (outside of the project) and pedestrian paths (sidewalks) link the residential uses with other uses such as commercial and retail.

All internal roadways will be striped for bicycle use and have sidewalks. Providing pedestrian pathways between various land uses and Commerce Way and at the northern end of the development along Del Paso Blvd.

Refer to the following page for a map showing the project location in relation to proposed and existing bicycle lanes.

6.5 Eliminates Residential Uses that Impede Bicycle/Pedestrian Circulation 1.0% - #33

This project has been designed to maximize bicycle and pedestrian connectivity between the residential uses and commercial/retail land uses. Although not planned, any berms, gates, walls, or structures that may be planned will allow for, and not impede, pedestrian/bicycle circulation.
7.0 TRANSIT

Regional Transit (RT) bus service is expanding as North Natomas continues to develop. In addition, the Developer has planned Area 3 to be served by future transit. The majority of the project is located along a minor bus corridor - the northern portion of the project along Del Paso Road is planned to be a major bus corridor.

Area 3 will not initially be directly served by transit, as the community is in the initial stages of infrastructure development. As the new residents begin to occupy homes and as commercial areas develop in North Natomas, residents and employees will be served by increased bus service provided by Regional Transit. By utilizing RT bus service, employees, visitors, and residents can transfer for free to light rail or other busses and travel to virtually anywhere in the RT service area. RT busses are equipped with bicycle racks and bicycles are allowed on light rail trains.

Planning for future transit service, Alleghany Properties volunteered to connect internal driveways or access ways to provide contiguous vehicle access for any potential or future RT vehicles. However, at this time RT is not planning any transit service off of Commerce Parkway. RT did state that the developer may want to provide such connections so they could operate their own internal shuttle system. Alleghany Properties will allow for a potential internal shuttle system and transit shelter(s) - 2%.

7.1 Mixed Use Within 1/4 Mile of Planned Transit 0.5% #10

Area 3 is a mixed use project with high density uses within 1/4 mile of planned transit. An apartment complex with a density of 18 d.u./acre is planned.

Please refer to the following page to view conceptually planned transit service in relation to the project.
Area 3
Conceptual Transit Corridors Map
8.0 SITE DESIGN 5.0%

Measures were incorporated into the design of this project to reduce the number of automobile trips such as ATM machines, on-site food service and retail areas. These design measures also form a solid foundation for reducing air quality impacts. To reduce the need for employee single occupancy vehicle (SOV) use during lunch time, and additional trips made by customers, the following have been included as on-site amenities.

On-Site Automatic Teller Machine (ATM)
Banking is one reason that an employee may get into their car and drive during the day. An automatic teller machine(s) (ATM) will be provided on-site to encourage employee usage so that travel to other locations to complete banking transactions will be minimized. These machines will also benefit customers/visitors by perhaps eliminating their need to drive to a separate location to withdraw money.

Food Service
Another on-site amenity provided by Area 3 will be food service (restaurants). Other on-site food service may be provided in the form of a coffee cart that sells sandwiches, coffee, muffins, etc. If employees have access to food on-site, this will help reduce the need to commute via a single occupant vehicle in anticipation of a lunchtime trip to a restaurant. Restaurants and/or food service areas will be located in convenient locations such as hub areas for access by residents and employees.

Retail
Residents and employees will have access to retail areas within Area 3. When shopping opportunities are available within a project area, residents and employees are more likely to walk or bicycle to these uses. Approximately 10% of the commercial development area may be used for retail uses.

9.0 PREFERENTIAL PARKING 5.0%

Supporting the use of alternative modes to commute to work is a goal of Alleghany Properties.

In order to accomplish this goal, Area 3 will designate a minimum of 10% of employee parking spaces for carpool vehicles and cleaner fuel vehicles. These spaces will be located in prime locations (close to employee entrances or near shade trees) in order to encourage ridesharing. The spaces will be clearly marked "Carpool/Vanpool/Cleaner Fuel Vehicles Only".

Based on 8,209 parking spaces provided in total within Area 3, approximately 575 preferential spaces would be required for use by carpooling employees.
10.0 CARPOOL/BICYCLE SUBSIDY 2.0%

When individuals choose to use alternatives, the community benefits by improved air quality and less traffic congestion. Area 3 residents and employees will be provided with a cash subsidy if they choose to use an alternative to driving alone to work such as by carpool or bicycle. The North Natomas TMA is offering this subsidy program as an incentive to encourage alternative forms of transportation. This program will be provided as a TMA membership benefit.

The current program includes a cash subsidy of $25 a month for three months to carpoolers. Those who wish to commute using a bicycle may receive up to 60% of the cost of purchasing a new bicycle.

11.0 LOADING AND UNLOADING FACILITIES FOR TRANSIT AND CARPOOL/VANPOOL USERS 0.5% - #19

The interior circulation of Area 3 is designed to make access to alternative modes including transit/shuttle, carpooling and vanpooling convenient. Loading and unloading facilities for transit riders, carpooler and vanpoolers will be provided at the front of each building in the commercial portion of the project.

Loading and unloading areas will follow design guidelines as required by the City of Sacramento.

12.0 PARKING 0.5% - #12

The amount of parking provided at a site is directly related to the amount of alternative mode use. If there is an abundance of parking it makes it easier to drive to work. However, limiting the amount of parking provides an incentive to carpool, bike, or walk to work.

Area 3 will provide the minimum amount of parking spaces required by the City of Sacramento (1 space/400 s.f. for commercial uses).

13.0 ELECTRIC VEHICLE CHARGING STATIONS 1.0% - #16

Great emission benefits will be realized if residents choose to purchase and drive an electric vehicle instead of a gas powered vehicle.

Electric charging stations will be available throughout Area 3 commercial areas. Multiple vehicles would be able to utilize these stations throughout the day/night.
14.0 TELEWORK TERMINALS 1.0% - #62

The residents of Area 3 will have free access to a telecommuting office that includes two computers (one computer terminal required for every 100 apartments). A fax machine and copy machine will also be available for use by residents. The telework center will be located in the main recreation center area or office area.

Providing of the telework area is intended to promote telecommuting. If a resident is able to telecommute occasionally, because of this provision, some vehicle trips will be completely eliminated.

15.0 GUARANTEED RIDE HOME 2.0%

All employees or residents who commute to work using transit or in a carpool or vanpool will be guaranteed a ride home in the case of a personal emergency or when they unexpectedly have to work late thereby missing the last bus or their normal carpool home.

The program will be provided by the North Natomas TMA and available to employees and residents of the project as a membership benefit (all tenants will be members of the North Natomas TMA). This program has proven very successful elsewhere in California. It removes one of the major objections employees have to giving up their private automobile (i.e., not being able to get home in case of an emergency), especially those with young families.

16.0 PERSONAL MATCHING ASSISTANCE (PMA) 2.0%

To make it easier for employees to form carpools or vanpools, Area 3 will provide employees and residents with personalized matching assistance (PMA) through their membership in the North Natomas TMA. PMA provides employees with a computerized list of other commuters within their employment or residential zip code, along with their nearest cross street, phone number, and hours they are available to commute to and from work. Employees are then able to contact and select individuals with whom they wish to carpool or vanpool. They will also be given a list of existing carpools and vanpools in their residential area which they may be able to join if space is available.

The carpool database is currently provided by SACOG Rideshare free of charge and can be accessed by the employee (if he/she would like to register on their own) by calling 1-800-COMMUTE. The TC and North Natomas TMA staff will work with Rideshare to assist employees and residents and promote the PMA program for all Area 3 employees.
17.0  **CHILD CARE CENTER  5.0%**

An on-site child care center(s) will be provided in the commercial area of Area 3. The child care center(s) is intended for use by employees working in Area 3. By providing an on-site child care center(s), parents who live and work in Area 3 will be able to walk, bicycle, or carpool to work more easily, as they will not need their car to transport children to an off-site child care center for daycare purposes.

Another advantage to having an on-site child care center(s) is that parents will be able to visit their children during the workday. They will be able to make visits without getting into a car. The child care center(s) will be centrally located so that parents will be able to walk or bike to the center for visits.

18.0  **LANDSCAPING  2.0% - #58**

Most small-engine landscape maintenance equipment is very ‘dirty’ in an air quality context. These small internal combustion engines often have very high pollutant emissions. Since landscaping companies use the equipment almost continuously throughout a workday, the cumulative impacts of these machines becomes a moderate source of the air pollutants in the Sacramento Valley.

The project proponent will contract with commercial landscapers who use either 50% electric or low emission equipment certified by the California Air Resources Board. Using an electric lawn mower versus a gas powered mower saves approximately the same amount of pollutants as created by 340 car miles traveled. Using electric lawn mowers will also eliminate fuel spills during refilling gas powered equipment. Other benefits to using electric equipment is cost savings and noise level reduction. The cost of energy to power electric equipment is minimal. Cordless electric equipment (especially mowers) offer noise levels at about half of their gas powered counterparts.

Contractors should use Tier I (1995 or newer) landscape equipment. Beginning in January 2001, equipment will be required to comply with either the most recent California certification standards or those adopted no more than three years prior to date of use.

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4 South Coast Air Quality Management District, 1997.

5 "Inadvertently, lawn and garden equipment users spill 17 million gallons of fuel each year while refilling their equipment tanks, which is more petroleum than was spilled by the Exxon Valdez [sic] in the Gulf of Alaska." Source: Sacramento Metropolitan Air Quality and Management District.
19.0 **TMA MEMBERSHIP 8.0%**

TMAs are private, nonprofit organizations run by a voluntary Board of Directors with typically a small staff. They help businesses, residents, developers, building owners, local government representatives and others to work together to collectively establish policies, programs and services to address local transportation problems. The key to TMAs lies in the synergism of multiple groups banding together to address and accomplish more than any employer, resident, building operator or developer could do alone.

The following is a listing of possible services that a TMA may provide:

- Shuttle Programs
- Carpool & Vanpool Matching
- Parking Management
- Transit Pass or Ticket Sales
- Emergency Ride Home Program
- Enhanced Bicycle Facilities
- Sponsored Vanpools
- Transit Subsidies
- Information on Local Issues
- Telecommuting
- Training
- Marketing Programs
- Work Hour Management
- Quarterly Newsletters

Currently the North Natomas TMA offers its employee and residential members services such as Guaranteed Ride Home Program, transportation fairs, ridematching assistance, and a carpool/bike subsidy program. All tenants and residents of Area 3 will be members in the North Natomas TMA. Costs for membership will be automatically paid by residents and tenants through annual assessments to the community Facilities District.

As the North Natomas community grows, additional services will be provided by the TMA. Anticipated additional services include a shuttle system.

Participation in the North Natomas TMA is in compliance with mitigation number 4.4-1 in the supplemental EIR for the '94 North Natomas Community Plan and is a project specific mitigation measure.

20.0 **INFORMATION KIOSK 0.5% - #8**

Prior to occupancy, all tenants and residents shall have available to them information that encourages improved air quality such as maps and schedules regarding the use of Regional Transit (bus and light rail), regional ridesharing programs, bicycle commuting programs, benefits of using electric lawn mowers, and Sacramento Air Quality Management District programs. This information will be updated as necessary (at a minimum annually) and distributed by the TC. This information may either be distributed to employees when they are newly hired or be displayed in employee common areas; residents will have this information available to them in the leasing/sales office. The following are the
types of information that will be provided:

- Maps and schedules regarding Regional Transit bus routes and light rail,
- Regional ridesharing programs (i.e., Rideshare Week, SACOG Rideshare’s 1-800-Commuter, rideshare matching, Regional Transit’s (RT) first time user guide and complimentary single use bus pass),
- Bicycle commuting programs (i.e., SACOG Rideshare’s bicycle buddy matching, Bike to Work Day, RT’s Bikes on Board), and
- Sacramento Air Quality Management District and North Natomas TMA programs (i.e., Guaranteed Ride Home Program, Spare the Air).

21.0 AVERAGE RESIDENTIAL DENSITY 3.0% - #26

Increasing the density of a project directly relates to improved air quality. The higher the density, the more likely one is to meet a neighbor to form a carpool or walking/bicycling group, or to take transit.

Area 3 has an average residential density of 18.0 dwelling units/acre.

22.0 EXPIRATION OF PLAN

All measures in this Master Plan shall continue to be implemented by the applicant. Informational promotions such as displaying flyers or transit schedules at the information kiosk will continue to be provided and updated as necessary. Updates will be provided by the Executive Director of the TMA, SACOG, the SMAQMD, or other agency with information, and given to the Transportation Coordinator for dissemination or display.

Periodic monitoring will be conducted by the City of Sacramento by telephone or on-site visits to ensure that measures in this Plan are being implemented.

Annual Report

Each year an annual report will be carried out by the Transportation Coordinator (TC) as follows:

1. Distribute to all Area 3 tenant employers (commercial and retail) a commute survey with instructions to distribute to each employee, and to collect and summarize the information on the Employer Commute Survey Summary form.

2. Collect the complete Employer Commute Survey Summaries from all tenants and summarize that information on the TMP Annual Report Summary.
3. The TMP Annual Report Summary will be forwarded to the Public Works Department for review and processing by the indicated due date (the due date will become the anniversary date for the annual status report).

23.0 CONCLUSION

The Area 3 proposed mixed-use development is consistent with the emission reduction goals contained in the North Natomas Community Plan and trip reduction goals of the City of Sacramento. This Plan is designed to improve air quality and traffic through emission and trip reducing mitigation measures. This Plan and the incentives associated with the Plan were developed in relation to the facilities and services currently available at and to the site.

Specifics regarding actual number of parking spaces, bicycle storage facilities, showers and lockers, and preferential parking spaces, etc., will be provided as the future commercial projects complete specific TSM/AQ Plans. Specifics found in this document referring to number of parking spaces, etc. are totals for the entire project which are based on total square footage. When all commercial/residential development is constructed, numbers should total to those found in this document. Future building of high density residential land uses will not require subsequent plans and will follow guidelines set forth in this document.

Alleghany Properties’ comprehensive approach to supporting the goals in the North Natomas Community Plan and providing amenities to the future employees of Area 3 in order to reduce air pollution will prove successful in helping to clean up our community’s air.

The combination of emission and trip reduction measures identified in this Plan provide the synergism necessary to obtain the 50% air pollution/trip reduction required for this project.

Please see the following pages for the required City forms that summarize the proposed measures contained in this Plan: Project Profile, City of Sacramento, and Compliance. Also attached is a listing of air quality contacts. Specifics provided within the following forms are guidelines only and based on existing square footage.
COMPLIANCE FORM
AIR QUALITY PLAN COMPLIANCE FORM

AREA 3

A total of 50% trip reduction and air quality combined mitigation is required for the commercial uses; residential uses require a 20% mitigation - required mitigation achieved through a combination of measures in categories A & B and are color coded in yellow.

A. TSM Measures in Plan

<table>
<thead>
<tr>
<th>Measure</th>
<th>Credit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preferential parking</td>
<td>5.0%</td>
</tr>
<tr>
<td>Site design</td>
<td>5.0%</td>
</tr>
<tr>
<td>Showers and lockers</td>
<td>2.0%</td>
</tr>
<tr>
<td>Transit shelter</td>
<td>2.0%</td>
</tr>
<tr>
<td>PMA</td>
<td>2.0%</td>
</tr>
<tr>
<td>GRH</td>
<td>2.0%</td>
</tr>
<tr>
<td>TMA</td>
<td>8.0%</td>
</tr>
<tr>
<td>Carpool/bike subsidy</td>
<td>2.0%</td>
</tr>
<tr>
<td>On-site child care center</td>
<td>5.0%</td>
</tr>
<tr>
<td>Flextime</td>
<td>2.0%</td>
</tr>
</tbody>
</table>

Subtotal: 35.0%

B. Air Quality Mitigation Measures

<table>
<thead>
<tr>
<th>Measure</th>
<th>Credit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Located within 1/2 mile of existing Class I bike lane</td>
<td>1.0%</td>
</tr>
<tr>
<td>Provides pedestrian overpasses and wider sidewalks</td>
<td>1.0%</td>
</tr>
<tr>
<td>Provide a display case/kiosk displaying trans. info.</td>
<td>0.5%</td>
</tr>
<tr>
<td>Residential use within 1/4 mile of planned transit</td>
<td>0.5%</td>
</tr>
<tr>
<td>Provide the minimum amount of parking required</td>
<td>0.5%</td>
</tr>
<tr>
<td>EV charging stations</td>
<td>1.0%</td>
</tr>
<tr>
<td>Loading and unloading areas</td>
<td>0.5%</td>
</tr>
<tr>
<td>Average residential density 7 d.u. per acre or greater (18)</td>
<td>3.0%</td>
</tr>
<tr>
<td>Mixed use - commercial and residential w/in 1/4 mile</td>
<td>1.0%</td>
</tr>
<tr>
<td>Separate &amp; safe bicycle &amp; pedestrian paths connecting residential, commercial &amp; office uses</td>
<td>2.0%</td>
</tr>
<tr>
<td>Provide development pattern that eliminates physical barriers that impede ped./bike activity</td>
<td>1.0%</td>
</tr>
<tr>
<td>Transportation Coordinator</td>
<td>0.2%</td>
</tr>
<tr>
<td>Contract with landscapers complying w/CARB standards</td>
<td>2.0%</td>
</tr>
<tr>
<td>Telework center</td>
<td>1.0%</td>
</tr>
</tbody>
</table>

Subtotal: 15.2%

TOTAL: 50.2%

Area 3
Project Name: Allegheny Properties, Inc.
Applicant Name: [Signature]

Approved By:
City of Sacramento, Traffic Engineer
City of Sacramento, Planning Director

The Hoyt Company
Page 12
November 14, 2001
CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California
County of SACRAMENTO ss.

On Jan 16, 2002 before me, Lillian Ann Higgins
personally appeared Timothy W. Heffler

Personally known to me
☑ proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Lillian Ann Higgins
Commission # 1282216
Notary Public - California
Sacramento County
My Comm. Expires Oct 28, 2004

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document
Title or Type of Document: TMA COMPLIANCE FORM

Document Date: 11/6/02 Number of Pages: 1

Signer(s) Other Than Named Above:

Capacity(ies) Claimed by Signer
Signer's Name: __________________________________________
☑ Individual
☑ Corporate Officer — Title(s): __________________________
☑ Partner — □ Limited □ General
☑ Attorney in Fact
☑ Trustee
☑ Guardian or Conservator
☐ Other: __________________________

Signer Is Representing: ___________________________________
PROJECT PROFILE
1. Name of Facility - Area 3

Facility Location - east of I-5, west of Commerce Pkwy., between Del Paso & San Juan Rds.

Zoning Designation - C-1; HC, EC-50, 40, 30; A-OS; R-2B

Gross Square Footage - 3,162,000 - Commercial ; 298.5 acre residential

Total # of Potential Employees - 8,817 - client estimate based on zoning

I. Parking Availability

A. Total Number of provided spaces: 7,905 - Commercial; 304 Residential

B. Number of spaces designated for employee parking: 5,746

C. Number of spaces to be designated for preferential parking: 575

D. Other: 1:400 for commercial; 1.5 /per d.u. +1/15 for guests

II. Transit Service Availability

A. Is there transit service to the vicinity of the project site? [yes] or no]

B. Is transit service planned for the area by the expected completion date of this project? [yes] or no]

C. Designate the transit agencies with service to the site:
   1. Regional Transit: [yes] Route #’s: 13, 14 (nearest existing transit)
   2. Roseville Commuter Lines: [yes] Route #’s: 
   3. Yolo Bus: [yes] Route #’s: 
   4. Paratransit: [yes]
   5. Other agencies:
D. Transit Facilities

1. List type of facilities now available at site:


III. Bicycle Facilities

A. List type and number of planned storage facilities:

205 Class I and 205 Class II (covers all land uses)

B. Will there be a charge for bicycle lockers?

[yes/no] How much: ________________________________

C. Is project site accessible by bicycle?

[yes/no] Explain: On-street and off-street bikeways will surround project.

D. Is project near an existing or proposed bikeway route?

Yes. See Bikeway Map on page 8 of the Master Plan for Area 3

IV. Miscellaneous Services, Facilities and Information

A. Is project site readily accessible by pedestrians?

[yes/no] Explain: Pedestrian pathways

B. Is project site near other worksites?

[yes/no] Explain: Arena Corporate Center, Residential, Natomas Airport

C. Does project site have easy freeway access?

[yes/no] Explain: I80/I5

D. Will project have passenger loading zones to accommodate carpool or vanpool pickup points? [yes/no] Explain:

In front of building entrances
CITY OF SACRAMENTO FORMS
CITY OF SACRAMENTO

Name of Applicant: Alleghany Properties
Name of Property Owner: Alleghany Properties
Contact Name: Mr. David Bugatto
Phone Number: (916) 648-7700
Facility Name: Area 3
Facility Site Location: North Natomas
Project Number: P01-028
Assessor Parcel Number: 225-0070-43,-49,-51,-74,-75/225-0014-16,-17/225-0158-31,-33,-43,-4f
Zoning Designation: EC, RD
Gross Square Footage: 3,162,000

No. of Potential Employees based on zoning designation: 8,817

Building Uses (if available)

<table>
<thead>
<tr>
<th>Hotel:</th>
<th>Sq. Ft.</th>
<th>No. of employees</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Retail:</th>
<th>Sq. Ft.</th>
<th>No. of employees</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Other:</th>
<th>3,162,000</th>
<th>8,817</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sq. Ft.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of Parking Spaces:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automobiles: 7,905 - Commercial; 304 Residential</td>
</tr>
<tr>
<td>Bicycles: Class I 205 Class II 205</td>
</tr>
</tbody>
</table>

Page 21
### AFFECTED EMPLOYEES

<table>
<thead>
<tr>
<th>TSM MEASURES</th>
<th></th>
<th>OCCUPANTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>WALKERS &amp; BICYCLISTS</td>
<td></td>
<td>Number / Percentage</td>
</tr>
<tr>
<td>Showers &amp; Lockers</td>
<td></td>
<td></td>
</tr>
<tr>
<td># of showers: 70 (35 each for men and women)</td>
<td>176</td>
<td>2%</td>
</tr>
<tr>
<td># of lockers: 700</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bicycle Lockers</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Class I</td>
<td>205</td>
<td></td>
</tr>
<tr>
<td>Class II</td>
<td>205</td>
<td></td>
</tr>
<tr>
<td>CARPOOL/VANPOOL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Preferential Parking</td>
<td></td>
<td></td>
</tr>
<tr>
<td># of spaces: 575</td>
<td>441</td>
<td>5%</td>
</tr>
<tr>
<td>% of parking: 10%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flextime</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Guaranteed Ride Home</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PMA Program</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Carpool/Bike Subsidy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TRANSIT RIDERS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transit Shelter</td>
<td>176</td>
<td>2%</td>
</tr>
<tr>
<td>TMA Membership</td>
<td>705</td>
<td>8%</td>
</tr>
<tr>
<td>Transit Passes</td>
<td></td>
<td></td>
</tr>
<tr>
<td># of passes:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% of subsidy:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Transit Operating Subsidy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>$ amt. of subsidy per passenger</td>
<td></td>
<td></td>
</tr>
<tr>
<td># of passenger subsidies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>OTHERS*</td>
<td>441</td>
<td>5%</td>
</tr>
<tr>
<td>Child Care Center(s)</td>
<td>441</td>
<td>5%</td>
</tr>
<tr>
<td>Site Design (ATM, Campus Style, Food Service, Retail)</td>
<td>441</td>
<td>5%</td>
</tr>
</tbody>
</table>

**TOTALS**

|   | 3086 | 35% |

---

Page 22
**TRANSPORTATION MANAGEMENT PLAN**

<table>
<thead>
<tr>
<th>TSM MEASURES</th>
<th>IMPLEMENTATION SCHEDULE OR COMPLETION DATE</th>
<th>DATE AND INITIALS OF DEVELOPER</th>
<th>DATE AND INITIALS OF TRAFFIC ENGINEER</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GROUP 1</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Showers and Lockers</td>
<td>Construction</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>GROUP 2</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Preferential Parking</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td>Child Care Center(s)</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td>Bicycle Storage</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td>Site Design</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td><strong>GROUP 3</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flextime</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td>Carpool/Bike Subsidy</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td>Guaranteed Ride Home</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td>PMA</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td>TMA Membership</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
<tr>
<td>Transit Shelter</td>
<td>Occupancy</td>
<td>1/16/02</td>
<td></td>
</tr>
</tbody>
</table>

I, THE APPLICANT ACCEPT THAT THE FIRST TENANT IMPROVEMENT PERMIT WILL NOT BE RELEASED UNTIL REQUIREMENTS ASSOCIATED WITH GROUPS 2 AND 3 MEASURES ARE COMPLETED.

APPLICANT SIGNATURE: [Signature] 1/16/02

APPROVED:

CITY OF SACRAMENTO, TRAFFIC ENG.

CITY OF SACRAMENTO, PLANNING DIF

Page 23
CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California
County of Sacramento ss.

On Jan 16, 2002 before me, Lillian Ann Higgins, Name and Title of Officer (e.g., Judge, Town Clerk, Notary Public), personally appeared Timothy W. Hetler, Name(s) of Signer(s).

Personally known to me □ proved to me on the basis of satisfactory evidence □

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Lillian Ann Higgins
Commission # 1282216
Notary Public - California
Sacramento County
My Comm. Expires Oct 28, 2004

Place Notary Seal Above

Signature of Notary Public

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document
Title or Type of Document: TMA APPLICATION

Document Date: 11/01/02 Number of Pages: 1

Signer(s) Other Than Named Above:

Capacity(ies) Claimed by Signer
Signer's Name:

□ Individual

□ Corporate Officer — Title(s):

□ Partner — □ Limited □ General

□ Attorney in Fact

□ Trustee

□ Guardian or Conservator

□ Other:

Signer Is Representing:

□
AIR QUALITY CONTACTS
AIR QUALITY INFORMATION CONTACTS

American Lung Association Sacramento Emigrant Trails chapter
909-12th Street
Sacramento, California 95814
Phone: (916) 444-5864 (LUNG) or (800) LUNG-USA
Fax: (916) 444-6661
Email: staff@alaset.org
Website: http://www.alaset.org
--Request information about Clean Air Month (May), and Bike to Work Week.

North Natomas Transportation Management Association (TMA)
Ms. Rhonda Abell
1500 West El Camino Avenue, Suite 355
Sacramento, CA 95833
Phone: (916) 648-2099
Website: http://www.nntma.org
--Request newsletters, when available. The TMA will become a clearinghouse for the information available from agencies on this page. The TMA will also have information about the Guaranteed Ride Home Program.

Regional Transit (RT)
P.O. Box 2110
Sacramento, California 95812-2110
Customer Relations Phone: (916) 321-2850 or (916) 321-2877 (BUSS)
Customer Relations Fax: (916) 444-0502
Website: http://www.sacrt.com
--Request system maps and pocket timetables for light rail trains and applicable North Natomas bus routes (currently; service may expand in area as time goes on). Also request the First Time Rider coupons.

Sacramento Area Council of Government (SACOG)
3000 S Street, Suite 300
Sacramento, California 95816-7056
Phone: (916) 264-2264
Fax: (916) 457-3299
Website: http://www.sacog.org
--Request information about 1-800-COMMUTE program, Rideshare Matching and Bicycle Buddy matching, The Rideshare program is described in Section 15.0 of the Plan (Personal Matching Assistance).

Sacramento Metropolitan Air Quality Management District (SMAQMD)
777 12th Street, 3rd Floor
Sacramento, California 95814
Community Education Phone: (916) 386-6669
Community Education Fax: (916) 386-7040
Website: http://www.airquality.org
--Request information about the Spare the Air programs, Cordless Electric Lawnmower Rebates, and reducing particulate matter pollution from fireplaces. Also request Sacramento Area Bikeway Maps.

Sacramento Municipal Utility District (SMUD)
Mr. Steve Revenaugh
Electric Charging Station
6201 S Street
Sacramento, California 95819
E-mail: srevena@smud.org
--Request information about SMUD's Electric Vehicle Program.