

# **AUBURN BOULEVARD OVER ARCADE CREEK BRIDGE REPLACEMENT PROJECT**

## **Appendix A**

### **Response to Comments**

- **Comment Letter from Gary Gaspari - County of Sacramento**
- **Response to Gary Gaspari Comment Letter**
- **Email Comments from Robert Armstrong - Regional Sanitation**
- **Response to Robert Armstrong Email Comments**
- **Comment Letter from Tim Vendlinkski**
- **Response to Tim Vendlinkski Comment Letter**
- **Comment Letter from Molly Wright – SMAQMD**
- **Response to Molly Wright Comment Letter**
- **Comment Letter from Haley MacGowan - SASD**
- **Response to Comment Letter from Haley MacGowan**
- **Comment Letter from Teri Burns - Sacramento Horsemen's Assn**
- **Response to Comment Letter from Teri Burns**
- **Comment Letter from Dylan Wood – CDFW**
- **Response to Comment Letter from Dylan Wood**
- **Comment Letter from Alexander Fong – Caltrans**
- **Response to Comment Letter from Alexander Fong**
- **Email comments from Tim Vendlinkski**
- **Response to email comments from Tim Vendlinkski**

Department of Transportation  
Ron E. Vicari, Director



**Divisions**  
Administration  
Maintenance & Operations  
Engineering & Planning

## County of Sacramento

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Sept. 8, 2020

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

**SUBJECT: COMMENTS ON THE NOTICE OF AVAILABILITY (NOA) FOR AUBURN BOULEVARD OVER ARCADE CREEK BRIDGE REPLACEMENT PROJECT (24C0081).**

Ron Bess,

The County of Sacramento appreciates the opportunity to review the submittal documents for Auburn Boulevard Over Arcade Creek Bridge Replacement. Sacramento County supports this project and the terms regarding the agreement from Sacramento County Board of Supervisors (BOS) meeting on July 16, 2019 Contact Number 81531 with the City of Sacramento.

As noted in the Contract, the County has authorized a full closure of Auburn Boulevard in between Winding Way and Park Road for a three-month period during construction of the project. Please continue to coordinate with the County through Right of Way Management regarding detours affecting nearby county facilities.

If you need any other information or have any questions, please contact me at [gasperig@saccounty.net](mailto:gasperig@saccounty.net)

Sincerely,

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Gary Gasperi, P.E.  
Associate Civil Engineer  
Department of Transportation

GSG

Cc: Ron Vicari, DOT  
Dan Shoeman, DOT  
Lu Li, DOT

Stephen White, DOT  
Lupe Rodriguez, DOT

Matthew Darrow, DOT  
Hardeep Sidhu, DOT

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

**Response to Comments for Comment Letter #1**

**Gary Gasperi  
Sacramento County  
Department of Transportation**

**Response to Comment**

**The City will continue to coordinate with the County through Right of Way management regarding detours affecting nearby county facilities**

**From:** [Armstrong, Robert](#)  
**To:** [Ron Bess](#)  
**Cc:** [Scott Johnson](#)  
**Subject:** RE: NOA/NOI for the Auburn Boulevard over Arcade Creek Bridge Replacement Project Mitigated Negative Declaration  
**Date:** Tuesday, September 15, 2020 7:49:57 AM  
**Attachments:** [897-S-120.pdf](#)

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Good Morning Ron,

Regional San doesn't have any facilities located within the proposed project's boundaries; however, the Sacramento Area Sewer District (SASD) has a collector line located adjacent/within Auburn Boulevard. SASD will be responding to the NOA/MND informing of this facility.

Best Regards,

Robb

**Robb Armstrong**  
*Principal Engineering Technician*

Regional San – Development Services & Plan Check  
 10060 Goethe Road  
 Sacramento, CA 95827  
 Phone: (916) 876-6104  
 Email: [armstrongro@sacsewer.com](mailto:armstrongro@sacsewer.com)  
[www.regionalsan.com](http://www.regionalsan.com)



Please consider the environment before printing this email.

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**From:** Ron Bess <RBess@cityofsacramento.org>  
**Sent:** Friday, September 4, 2020 9:34 AM  
**To:** Air Quality <pphilley@airquality.org>; Alexander Fong <Alexander.fong@dot.ca.gov>; Alisa Johnson <ABJohnson@cityofsacramento.org>; Allen W. Warren <AWarren@cityofsacramento.org>; Alta Tura <saccreek@gmail.com>; Anna Starkey <astarkey@auburnrancheria.com>; Arthur Murray - Caltrans <Arthur.murray@dot.ca.gov>; Bill Templin <wetemplin@att.net>; Bruce Monighan <BMonighan@cityofsacramento.org>; Caltrans <D3PlanningSouth@dot.ca.gov>; Carson Anderson <canderson@cityofsacramento.org>; Cherylyn Neider - UAIC <cneider@auburnrancheria.com>; Cheryle Hodge <CHodge@cityofsacramento.org>; Dana Repan <DRepan@cityofsacramento.org>; Dawn Plise <pgeplanreview@pge.com>; Evan Compton <ECompton@cityofsacramento.org>; Greg Sandlund <GSandlund@cityofsacramento.org>; Hannah Hughes <hannah@lozeaudrury.com>; Inthira Mendoza <imendoza@cityofsacramento.org>; Janet Laurain <jlaurain@adamsbroadwell.com>; Jeffrey Heeren <JHeeren@cityofsacramento.org>; Jennifer Donlon Wyant <JDonlonWyant@cityofsacramento.org>; John Mayfield <Johnmayfield30@msn.com>; Atwal. Kamal <atwalk@SacCounty.NET>; Kelli Trapani

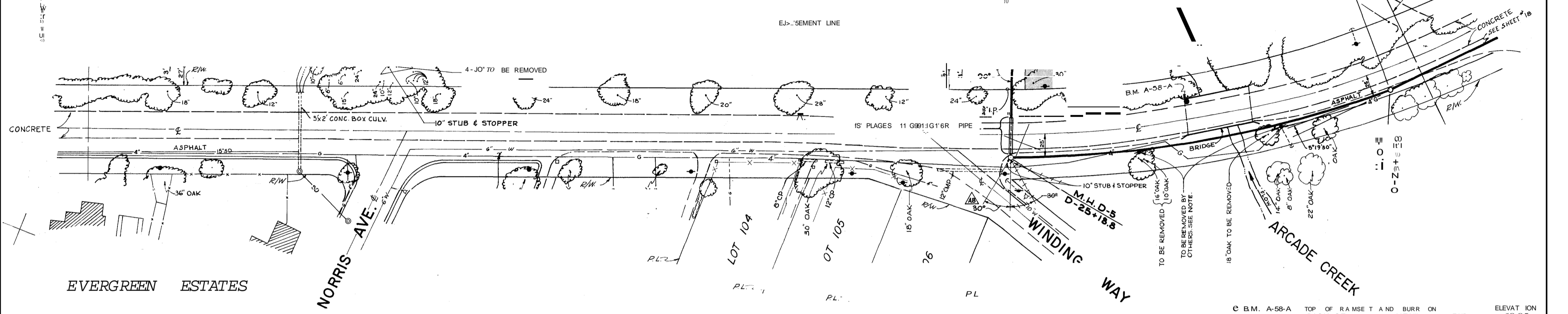


**Sacramento Area Sewer District Disclaimer - for Public Sewer Information**  
 The Sacramento Area Sewer District (District) sewer facility drawing depicts sewer infrastructure within the District. The District has made no effort to verify the actual field existence, locations, and depths of the sewer facilities shown on this drawing. The user of the sewer information on this drawing must verify actual field locations, and depths of the sewer facilities shown. The District shall not be held responsible for any represented locations or depths of sewer facilities shown on this drawing. For full text of SASD disclaimer go to [www.sacsewer.com](http://www.sacsewer.com)

# DEL PASO PARK

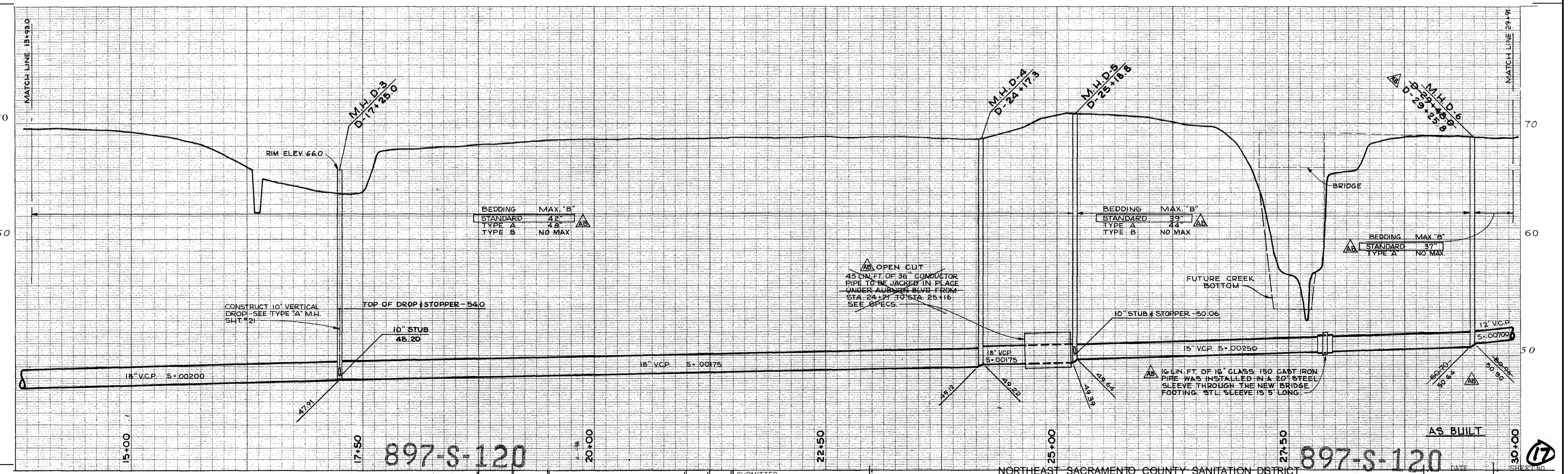
CITY OF SACRTO.  
 BK. S019 PG. 35077

Scale: 20'0" = 1' 30"  
 R = 1220.0'  
 T = 216.8'  
 L = 47.92'



NOTE CONTRACTOR SHALL NOTIFY THE PACIFIC TEL CO. 30 DAYS PRIOR TO CONSTRUCTION IN VICINITY OF TEL POLES. TREES SHALL BE REMOVED BEFORE REMOVAL OF TEL POLES. CONTACT W.B. FIESE, DISTRICT ENGINEER CONSTRUCTION SUP'T. PACIFIC TELEPHONE CO. 2277 WATT AVE.

C.B.M. A-58-A TOP OF RAMSEY AND BURR ON BACK OF SIDE WALK, NEAR WEST END OF CONC. BRIDGE RAIL, N.W. END OF BRIDGE CROSSING ARCADE CREEK, NORTH OF WINDING WAY. ELEVATION 69.95



DEWANTE AND STOWELL  
 SANITARY AND CIVIL ENGINEERS SACRAMENTO, CALIFORNIA

REVISION	DATE	DESCRIPTION	R.N.E. S.J.'S.	BY	APP'D
1	12-8-05	BUILT REV 1510N5			

NORTHEAST SACRAMENTO COUNTY SANITATION DISTRICT  
 SANITARY TRUNK SEWERS DEL PASO PARK SYSTEM  
 PLAN AND PROFILE 011 LINE

DATE	NOV., 1964	SHEET NO.	17
CHKD	DRWN	OF	23
S.J.S.	H.J.N.		



**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

**Response to Comments for Comment Letter #2**

**Robb Armstrong  
Regional San**

**Response to Comment**

**Acknowledge that Sacramento Area Sewer District (SASD) has a collector line located adjacent within Auburn Boulevard.**

Comments by Tim Vendlinski  
Arcade Creek Restoration Project  
tvendlinski@sbcglobal.net  
10/01/20

NOTICE OF AVAILABILITY/INTENT TO APPROVE THE DRAFT MITIGATED NEGATIVE DECLARATION

**AUBURN BOULEVARD OVER ARCADE CREEK BRIDGE REPLACEMENT PROJECT  
(24C0081)**

City of Sacramento - Community Development Department - Environmental Planning Services  
Dewberry | Drake Haglan

Page 4.

**SECTION II - PROJECT DESCRIPTION  
PROJECT LOCATION**

Page 96.

**Tree Survey Report  
2. METHODOLOGY**

The CEQA document discloses that the study area for the project encompasses 6.4 acres, but this acreage figure is first enumerated on page 96 in the the Tree Survey Report. This useful information should be noted at the beginning of the document in the project description.

Page 5.

**SECTION II - PROJECT DESCRIPTION  
PROJECT DESCRIPTION**

Pages 32-35.

**4. CULTURAL RESOURCES  
(ENVIRONMENTAL SETTING).**

Page 56.

**SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION  
RECREATION**

(A, B) Effects Can be Mitigated...

Re: Staging Areas and Mitigation Measure REC-1

**Staging Areas**

Figures 2, 3, and 4 on pages 81, 82, and 83; respectively, show a red rectangle surrounding the unpaved **Owl Creek Terrace immediately west, and contiguous with, Bridge Road**. This is the historic floodplain of Owl Creek, and has a known history of saturated soils and ponding water. **Under no circumstances should Owl Creek Terrace be considered for, or used as, a staging area for the Auburn Blvd. Bridge Replacement project.**

Over the years, the site has been scraped, plowed, and filled with gravel and imported soil. In 2013, the City allowed the Sacramento Suburban Water District and Doug Veerkamp Engineering to use the southern half of the site (bordering Auburn Blvd.) as a

staging area for an infrastructure project. Heavy equipment was used to fill and compact the already degraded seasonal wetlands, and this greatly diminished the water holding and retention capacity of the wetland.

Then, in 2018, the City directed the heavy equipment operators working for Dan Rasmussen on the “Measure U parking lot” to dump innumerable truck loads of fill material onto the northern half of Owl Creek Terrace (bordering Arcade Creek). The City performed no surveys for aquatic resources and cultural resources at Owl Creek Terrace before allowing the use of heavy equipment and the disposal of fill material at the site in 2013 and 2018. The second incident was the subject of a complaint filed with CalEPA and the Regional Water Quality Control Board (Central Valley Region), and this potential enforcement case under the Clean Water Act has not been resolved.

*Parks and Wreck?*

<https://www.newsreview.com/sacramento/parks-wreck/content?oid=27507919>

If a staging area is indeed needed west of the project site for the Auburn Blvd. Bridge Replacement, it should be established on the **large, closed, paved parking area previously used for the dormant Renfree Field, immediately east and contiguous with Bridge Road**. In 2020, this Renfree parking lot was used as a staging area for a major infrastructure project on Auburn Blvd., so it would be more than adequate for the bridge replacement project. Renfree Field has been closed for years, so there would be no conflict with baseball activities, but there could be impacts to the nearby, State-funded play structure for children.

The Renfree lot would be more useful and convenient than the Powerhouse parking lot due to ease of access, and the absence of curbs, landscaping features, and mature shade trees that are present at the Powerhouse parking lot. The wide open spaces would make it easier to maneuver heavy equipment, and allow for the convenient storage of building materials and demolition waste.

Page 7.

New Bridge Construction

SECTION II - PROJECT DESCRIPTION

Temporary Pedestrian Bridge and Pedestrian Detour.

Page 61.

SECTION II - PROJECT DESCRIPTION

12. TRANSPORTATION AND CIRCULATION

ANSWERS TO CHECKLIST QUESTIONS

C) No Additional Significant Effect

Temporary Pedestrian Crossing

Rather than spending valuable material, labor costs, and time building, and then dismantling, a temporary pedestrian crossing, the City should instead be installing a **flood-resistant and permanent pedestrian/equestrian crossing** on Arcade Creek ~200 feet downstream (northwest) of the Auburn Blvd. Bridge.



A permanent pedestrian/equestrian bridge in this location would connect the trail on the north bank of the creek (along Park Road) to the trail on the south bank of the creek (within the East Side Natural Area), therefore establishing a new loop trail in the Park. There is already a loop trail encircling the East Side Natural Area south of the creek, but the trail on the north bank stops abruptly at Park Road, and is not connected to this loop.

A loop trail connecting the north and south banks via a permanent pedestrian/equestrian bridge would greatly improve recreation opportunities at the Park. As it stands, the only option available to hikers, runners, and equestrians for navigating the north and south trails is to cross the creek on the Auburn Blvd. Bridge itself, but this is treacherous for all concerned.

The design and installation of the new pedestrian/equestrian bridge should be melded with the design and implementation of a riparian restoration project on the unnamed tributary within the Del Paso Park picnic area, recommended below.

The City already installed a nice Hallsten bridge near the 18th tee of the Arcade Creek Golf Course, and that bridge has served golfers for many years. Please see the links below for the Hallsten bridge already in the Park, and another company that offers similar, pre-cast bridges.

*Arcade Creek Hole #18 - Beware of the Double Cross*

<https://yougolfgirl.wordpress.com/2018/05/13/the-nines-at-haggin-oaks-arcade-creek/#jp-carousel-1726>

Hallsten Pedestrian Bridges

<https://hallsten.com/wp-content/uploads/2017/05/Pedestrian-Bridges.pdf>

True North Steel

[https://truenorthsteel.com/bridge/pedestrian-bridges/?gclid=EAJaIQobChMIibyMtdTu6w-IV5QI9Ch0rwQoTEAAAYASAAEgLML\\_D\\_BwE](https://truenorthsteel.com/bridge/pedestrian-bridges/?gclid=EAJaIQobChMIibyMtdTu6w-IV5QI9Ch0rwQoTEAAAYASAAEgLML_D_BwE)

Page 10-11.

**SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION**

**Discussion, Land Use.**

Page 96.

**Tree Survey Report**

**2. METHODOLOGY**

The CEQA document must mention that the City Council passed Resolutions in 1985 and 2002 designating for conservation a total of ~100-acres within Del Paso Regional Park. There are four Natural Area “units” in the Park consisting of: the *East Side Natural Area*, the *West Side Natural Area*, the *Arcade Creek Natural Area*, and *Longview Oaks Preserve*. The CEQA document should also provide acreage figures for the study area and project site; as far as I could tell, it is only mentioned once in the Tree Survey Report (6.4 acres).

The City maintains a large archive of documents pertaining to Del Paso Regional Park that should be utilized for this and all future CEQA documents.

<https://www.cityofsacramento.org/ParksandRec/Parks/Park-Directory/Arden-Arcade/Del-Paso-Regional-Park>

Page 20.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

Mitigation Measure AQ-2:

Non-native grasses **should not** be used for erosion control.

The City should order grass plugs and/or seeds from Hedgerow Farms derived from regional grass populations, if possible. Hedgerow Farms sells a mix of native grasses specifically for erosion control that could benefit biodiversity within the larger Arcade Creek Natural Area once the grasses mature and disperse seed.

Hedgerow Farms - Native Erosion Control Seed Mix

<https://www.hedgerowfarms.com/online-store/Native-Erosion-Control-Mix-p94443350>

Page 23.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

Re: the “*very poor habitat*” within Arcade Creek.

Portraying the condition of habitat within the watershed as “very poor” without providing a credible context for how it got that way, is inconsistent with the spirit of CEQA to characterize site conditions in a neutral and factual manner. This portrayal implies that something is intrinsically wrong with the Creek and Park, and that it lacks value to the community and society as a whole.

Private developers and “pro-business” elements within municipal governments have long favored this portrayal for sites they consider ripe for development as a way to downplay impacts of their proposed projects, and as a premise for developing these areas with a minimal regulatory burden. These same developers and municipal departments almost always fail to acknowledge their own collective and cumulative complicity in destroying and degrading these habitats through a steady sequence of egregious land-use decisions that span generations in the Sacramento metropolitan area. Developers and municipal governments caused these “very poor” habitat conditions, and they must be held accountable today with stringent regulatory requirements aimed at reversing some of the historical damage.

*Oak Woodlands as Wildlife Habitat* (2005)

[https://www.fs.fed.us/psw/publications/purcell/psw\\_2005\\_purcell002\\_tietje.pdf](https://www.fs.fed.us/psw/publications/purcell/psw_2005_purcell002_tietje.pdf)

*Haggin Oaks Background Report* (2009)

[https://saccreeks.org/wp-content/uploads/2012/10/HagginOaksBackgroundReport\\_Draft11-10-09.pdf](https://saccreeks.org/wp-content/uploads/2012/10/HagginOaksBackgroundReport_Draft11-10-09.pdf)

Page 23.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION  
3. BIOLOGICAL RESOURCES  
SPECIAL STATUS AQUATIC AND SEMIAQUATIC SPECIES  
Western Pond Turtle

The Western Pond Turtle was still present in Arcade Creek in the late 1970s, and it might still be present today in remote stream reaches where large woody debris have accumulated to form isolated, perennial pools, or in the proximity of beaver dams. Most importantly, Arcade Creek within the Regional Park could serve as an important reintroduction site for this declining species.

Deep pools persisting in Arcade Creek through the Sacramento Summer (June 2018)  
<https://www.facebook.com/ArcadeCreekAACP/photos/pcb.896281280581657/896280850581700>

Page 22.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION  
3. BIOLOGICAL RESOURCES  
SPECIAL STATUS AQUATIC AND SEMIAQUATIC SPECIES

Salmon, Steelhead, and Resident Inland Fishes

This CEQA document must be amended to account for the presence of Chinook salmon within the project area, and must ensure that standard mitigation measures for anadromous fishes are tailored to the site-specific conditions within Arcade Creek.

“*Salmon and Steelhead Observed in Arcade Creek*” (2016)

<https://saccreeks.org/wp-content/uploads/2016/12/161220.Templin-Arcade-Creek-History-Salmon-Sightings-3.pdf>

“*Evidence of Chinook Spawning in Urban Arcade Creek*  
Can Urban Creek Habitat Help Replace Lost Spawning Habitat?”  
(Templin and Le Doux-Bloom, circa 2017)

<https://www.facebook.com/ArcadeCreekAACP/photos/gm.2035675083208149/1091864981023285>

This CEQA document should acknowledge the presence of non-anadromous, native inland fishes that persist in Arcade Creek despite the large-scale habitat destruction, and the contamination of its surface waters. For example, the City should address the conservation needs of the Sacramento sucker regardless of its regulatory status.

Spawning Sacramento Suckers in Arcade Creek (Thompson, 2017)

<https://www.facebook.com/ArcadeCreekAACP/photos/a.673968746146246/673979272811860>

FishBio: *Subsistence Fishing for Sacramento Sucker*

<https://fishbio.com/field-notes/wildlife-ecology/subsistence-fishing-for-sacramento-sucker>

*Threats, conservation strategies, and prognosis for suckers (Catostomidae)...* (2004)

<http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.619.6508&rep=rep1&type=pdf>

Page 23.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

3. BIOLOGICAL RESOURCES

SPECIAL STATUS TERRESTRIAL SPECIES

Nesting Songbirds and Raptors.

Page 28.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

3. BIOLOGICAL RESOURCES

Mitigation Measure BIO-4:

Conduct Reconstruction Surveys for Swainson's Hawk

This section needs to be revised and significantly expanded to incorporate a more comprehensive dataset generated by the Sacramento Audubon Society (SAS). SAS and its allies have assembled a robust, peer-reviewed dataset documenting the presence of 114 bird species at Del Paso Regional Park, including Swainson's Hawk and White-tailed Kite. My understanding is that Swainson's hawks were observed within 0.50 miles of the project site, immediately southeast of the intersection at Winding Way @ Auburn Blvd. Much further west, on Haggin Oaks Golf Course, a nesting pair was observed in a large oak tree near the junction of the "Arcade Creek" and the "MacKenzie" golf courses.

eBird - Bird Observations

<https://ebird.org/barchart?r=L920553&yr=all&m=>

Page 26.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

3. BIOLOGICAL RESOURCES

ANSWERS TO CHECKLIST QUESTIONS

C. Effects Can Be Mitigated to Less than Significant.

Native trees in the project area include Interior Live Oak and Blue Oak, a species endemic to California and locally rare. Canyon Live Oak is probably not present in the project area.

Trees Native to the 95821 Zip Code - Calscape

[https://calscape.org/loc-38.6259,-121.3885%20\(95821\)/cat-Trees/ord-species?srchr=sc5f62bcaba315f](https://calscape.org/loc-38.6259,-121.3885%20(95821)/cat-Trees/ord-species?srchr=sc5f62bcaba315f)



Page 25.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

3. BIOLOGICAL RESOURCES

SUMMARY OF ANALYSIS -

GENERAL PLAN 2035 MASTER EIR

General Plan Policy ER 2.1.5

re: 1:1 replacement of riparian habitat.

The temporal and permanent impacts to riparian habitat on the main-stem of Arcade Creek should be mitigated onsite by re-aligning, re-vegetating, and securing the unnamed tributary to Arcade Creek within the Del Paso Park picnic area. This tributary carries surface water from north to south from the culvert beneath SR-244 across the sunken picnic. Please see my more detailed comments below regarding Pages 28 and 30 of the CEQA document.

Page 27.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

SUMMARY OF ANALYSIS...TREE PLANTING, MAINTENANCE, AND CONSERVATION

ANSWERS TO CHECKLIST QUESTIONS

C) Effects Can Be Mitigated...

Page 97.

Appendix C: Tree Survey Report

2. METHODOLOGY

The tree survey was nicely done, however, the CEQA document needs to take the next step and identify which 30 of the 93 trees need to be removed for the bridge replacement project. Figures 3-1 and 3-2 should display color-coded dots for those trees that will be removed, and these proposed tree removals should be cross-referenced and noted on the actual survey table (pages 106-108) with a simple asterisk, or with notations in an additional column.

Page 7.

SECTION II - PROJECT DESCRIPTION

Stream Diversion

P. 27

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

3. BIOLOGICAL RESOURCES

ANSWERS TO CHECKLIST QUESTIONS

C. Effects Can Be Mitigated to Less than Significant.

Please delete the sentence: "The Project site is not located within an established native resident or migratory wildlife corridor or wildlife nursery site."

Arcade Creek and Del Paso Regional Park are both nursery areas for fish and wildlife, and known corridors for wildlife dispersal. Wildlife originating in, or visiting, the Creek include beaver, black-tailed jackrabbit, coyote, deer, puma and river otter.

The CEQA document should account for, and mitigate, any potential adverse impacts on these and other species that occupy habitat in the vicinity of the project area.

Beaver Dam on Arcade Creek (May 2019)

<https://www.facebook.com/ArcadeCreekAACP/photos/pcb.1126621160881000/1126867594189690/>

Page 28.

**SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION**

**3. BIOLOGICAL RESOURCES**

**Mitigation Measure BIO-2: Protect Central Valley Steelhead**

**Bullet #11**

**Bullet #12**

This mitigation measure should be implemented by restoring the main-stem of Arcade Creek, and the unnamed tributary nearby, to benefit both Central Valley Steelhead and Chinook salmon.

Please see the detailed comments below on Page 30 regarding compensatory mitigation (on-site, in-kind) at “Mitigation Measure BIO-7: Preserve Trees and Riparian Habitat” - bullets #7 & #8).

Also, consistent with “Mitigation Measure BIO-7: Preserve Trees and Riparian Habitat” (page 30, bullets #4 & #5), the City should coordinate with “local advocacy groups” and CDFW on a “replanting/restoration plan...that will ensure successful restoration of the onsite riparian areas”.

Page 30.

**SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION**

**3. BIOLOGICAL RESOURCES**

**“Mitigation Measure BIO-7:  
Preserve Trees and Riparian Habitat”**

**Bullet #7**

Consistent with my comment below on bullet #8, when non-native shrubs and trees (e.g., *Zelkova serrata*) are encountered in and around the project area, they should be completely removed and treated with herbicide rather than just trimmed and left in place.

Page 30.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

3. BIOLOGICAL RESOURCES

Mitigation Measure BIO-7:

Preserve Trees and Riparian Habitat

Bullet #8

No; please **do not** buy credits from a mitigation bank.

While there are excellent mitigation banks for shaded riparian habitat within the regulatory “service area”, the City has a unique and compelling opportunity with this infrastructure project to leverage the compensatory mitigation requirements toward the restoration of the degraded, unnamed tributary that flows into Arcade Creek immediately downstream of the bridge replacement project.

In 1985, the City Council designated a Natural Area for the Arcade Creek riparian corridor that begins at the Auburn Blvd. Bridge and stretches westward almost all the way to the Roseville Road Bridge. The ~3 acre unnamed tributary that is contiguous with the Arcade Creek Natural Area near the project site should be restored, attractively fenced, and added to the portfolio of Natural Areas within Del Paso Regional Park.

The restoration design should incorporate the findings and recommendations of scientists who are restoring riparian forests for the maximum benefit of resident and migratory birds and fishes. The channelized ditch should be reworked to add meanders and sinuosity, and the existing natural dam of large woody debris at the tributary’s confluence with Arcade Creek should be left in place, and possibly augmented.

*California Riparian Restoration Handbook* (2018)

[http://www.riverpartners.org/wp-content/uploads/2018/08/Journal\\_2009-v5n3-fall.pdf](http://www.riverpartners.org/wp-content/uploads/2018/08/Journal_2009-v5n3-fall.pdf)

*The Riparian Bird Restoration Plan* (2004)

[http://www.prbo.org/calpif/pdfs/riparian\\_v-2.pdf](http://www.prbo.org/calpif/pdfs/riparian_v-2.pdf)

*The Oak Woodland Bird Conservation Plan* (2002)

<http://www.prbo.org/calpif/pdfs/oak.v-2.0.pdf>

*Stream Restoration: A Natural Channel Design Handbook*

<https://semspub.epa.gov/work/01/554360.pdf>

*Large Woody Debris in Urban Stream Channels: Redefining the Problem* (2011)

[https://people.wou.edu/~taylors/g407/restoration/Lassette\\_Kondolf\\_2012\\_LWD\\_urban\\_streams.pdf](https://people.wou.edu/~taylors/g407/restoration/Lassette_Kondolf_2012_LWD_urban_streams.pdf)

There are local engineering firms possessing the knowledge and skills to do riparian restoration projects on Arcade Creek. Consequently, the money earmarked by the City to purchase mitigation credits should instead be used to hire a reputable firm to design and build a tributary restoration project that adds value to Arcade Creek and Del Paso Regional Park.

*Arcade Creek Park Preserve Restoration Project*

<https://www.cbecoeng.com/our-projects/arcade-creek-park-preserve-restoration-project/>

The sunken picnic area already serves as a de facto detention basin for floodwaters, thereby helping to reduce the volume and velocity of peak flows on the main-stem of Arcade Creek. Civil engineers should use this pre-existing basin to their advantage when designing and implementing a restoration project on the unnamed tributary. A detention and filtration project here would complement the much larger detention basin that the City built immediately downstream within the East Side Natural Area to capture, retain, filter, and recharge contaminated run-off from Norris Swale.

*Del Paso Regional Park Detention and Filtration Wetland*

[https://www.cityofsacramento.org/-/media/Corporate/Files/ParksandRec/Parks/DelPasoRegional/10-AC-DelPasoRegPark-DandFWProject\\_CPlans.pdf?la=en](https://www.cityofsacramento.org/-/media/Corporate/Files/ParksandRec/Parks/DelPasoRegional/10-AC-DelPasoRegPark-DandFWProject_CPlans.pdf?la=en)

The standing water that covers the picnic area and unnamed tributary during and after rainfall events is comprised by flows draining into the park from the SR 244 culvert that commingle with flows that back-up into the picnic area from the main-stem of Arcade Creek. The picnic area is part of the Creek's historic floodplain, and this natural process helps reduce peak flows on the main-stem and protect flood-prone parcels downstream. Even during average rainfall years, the standing water submerges the unnamed tributary, and would provide the dynamic hydraulic and hydrological conditions necessary to establish a native wetland and riparian forest.

*Flooded Park: Picnic area at Del Paso Regional park is underwater! (Ali Wolf)*

<https://twitter.com/awolfTV/status/982376031557316608?s=20>

Restoring the “liability” of the unnamed tributary (that is nothing more than a channelized, degraded ditch) into a multi-benefit, “ecological asset” with beautiful and productive wetlands and riparian forest would:

- (i) replace the functions and values of the riparian habitat lost to the bridge replacement,
- (ii) expand “off-stream” refugia for aquatic species who have been extirpated from all of the other small tributaries lost to suburban development and degradation, and
- (iii) improve the water quality of the drainage flowing into Arcade Creek from the picnic area.



*Persistence of native fishes in small streams of the urbanized San Francisco Estuary, California: acknowledging the role of urban streams in native fish conservation* (2011)  
[https://nature.berkeley.edu/carlsonlab/wp-content/uploads/2016/01/LeidyEtAl\\_2011\\_AquaticConserv.pdf](https://nature.berkeley.edu/carlsonlab/wp-content/uploads/2016/01/LeidyEtAl_2011_AquaticConserv.pdf)

A **compensatory mitigation plan** for the bridge replacement project on the mainstem of Arcade Creek should include the following elements to both restore conditions on the project site, and to compensate for unavoidable impacts at the project site by restoring the unnamed tributary within the picnic area:

- (a) directly seeding locally collected acorns;
- (b) planting oak seedlings/saplings germinated from locally-collected acorns, and installing a drip-irrigation system for each seedling/sapling that will be maintained for a minimum of 3 years (NOTE: larger “native” trees from conventional nurseries should not be planted unless seeds and/or cutting were sourced from the Arcade Creek watershed or the Lower American River Basin);
- (c) planting native shrubs that have been nearly extirpated from the Park, e.g., Elderberry (*Sambucus nigra ssp. caerulea*), Mulefat (*Baccharis salicifolia*), and Toyon (*Heteromeles arbutifolia*); (NOTE: the shrubs should be sourced from the CNPS’ Elderberry Farms Native Plant Nursery or a similar nursery in the area that grows plants for local restoration projects):

Elderberry Farms Native Plant Nursery  
[https://www.sacvalleyncps.org/index.php?option=com\\_content&view=article&id=4&Itemid=110](https://www.sacvalleyncps.org/index.php?option=com_content&view=article&id=4&Itemid=110)

Shrubs Native to the 95821 Zip Code - Calscape  
[https://calscape.org/loc-38.6259,-121.3885%20\(95821\)/cat-Shrubs/ord-species?srchr=sc5f7543a54b832;](https://calscape.org/loc-38.6259,-121.3885%20(95821)/cat-Shrubs/ord-species?srchr=sc5f7543a54b832;)

- (d) planting Deergrass plugs (*Muhlenbergia rigens*) along the re-contoured channel of the unnamed tributary to hold the soil in place while the shrubs and trees are growing (NOTE: Deergrass sourced from Placer County can be purchased at Hedgerow Farms);
- (e) cutting, removing, and stump-treating with herbicide all non-native shrubs, trees, and plants growing within stream reaches 300’ upstream, and 300’ downstream, of the project site at Auburn Blvd.; and maintaining these reaches for a minimum of 3-years to prevent the recolonization of non-native vegetation;

*California Wildland Invasive Plants*  
<https://www.cal-ipc.org/resources/library/publications/ipcw/cwip/>

(f) preparing a long-term maintenance plan for the mitigation areas that restricts the use of string-trimmers or flail-mowers to only those maintenance staff who are trained to use this machinery without harming or killing the native grasses, shrubs, and trees;

*Tree damage reaches epic proportions*

<https://www.agweek.com/opinion/columns/4097778-kinzler-tree-damage-reaches-epidemic-proportions>; and

(g) designing and installing site-specific fencing and signage for the compensatory mitigation site(s) explaining:

- (i) the mitigation sites were placed there to compensate for the habitat lost to the bridge replacement project;
- (ii) once the new trees mature, they will replace the functions and values of the ~30 mature trees that were removed;
- (iii) the restored wetland, detention basin, and riparian forest on the unnamed tributary will improve water quality in Arcade Creek and help reduce the risk of flooding downstream; and
- (iv) the mitigation sites are now part of the Park's Natural Area system, and access is restricted to Park personnel, and to those with permission from the City.

A number of large, mature, "original" oaks are still living in the Park and on adjacent private properties, and these venerable trees continue to produce acorns that have driven the recovery oak woodlands in the area since 1985. Oak reforestation projects along the Creek and within the Park should be done by germinating acorns from these "original" oaks and their likely progeny, and by protecting wild oak seedlings/saplings that have sprouted on their own.

*Riparian canopy expansion in an urban landscape: Multiple drivers of vegetation change along headwater streams near Sacramento, California* (Solins, 2018)

<https://www.sciencedirect.com/science/article/abs/pii/S0169204617303262?via%3Dihub>

*How to Grow California Oaks*

<https://oaks.cnr.berkeley.edu/how-to-grow-california-oaks/>

This mitigation approach incorporates an aggressive weed-eradication element, and can be thought of as "addition by subtraction"; that is every non-native shrub and tree that is subtracted from the forest will most likely be replaced by a native tree that is already growing in the understory nearby. Non-native plants of greatest concern within Del Paso Regional Park include:

*Acacia dealbata,*  
*Ailanthus altissima,*  
*Albizia julibrissin,*  
*Arundo donax,*

*Catalpa bignonioides,*  
*Centaurea solstitialis,*  
*Hedera helix,*  
*Ligustrum japonicum,*  
*Phoenix canariensis,*  
*Pistacia chinensis,*  
*Prunus ilicifolia,*  
*Sesbania punicea,*  
*Triadica sebifera,*  
*Ulmus parvifolia,* and  
*Vinca major.*

In 2010, the City funded a major weed survey of the watershed, but it was never implemented. To my knowledge, no weeds were ever eradicated under this program. The mitigation requirements for the Auburn Blvd. Replacement Project should be leveraged to finally begin this necessary weed eradication work along Arcade Creek.

*Invasive Plant Species Control and Management Plan for the Arcade Creek Stream Corridor (2010)*

[https://www.cityofsacramento.org/-/media/Corporate/Files/ParksandRec/Parks/DelPasoRegional/07-AC-InvasivePlantPlan\\_2010.pdf?la=en](https://www.cityofsacramento.org/-/media/Corporate/Files/ParksandRec/Parks/DelPasoRegional/07-AC-InvasivePlantPlan_2010.pdf?la=en)

Pages 32-35.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

4. CULTURAL RESOURCES  
(ENVIRONMENTAL SETTING)

Page 66.

SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION

13. TRIBAL CULTURAL RESOURCES  
ANSWERS TO CHECKLIST QUESTIONS  
(Ai, Aii) Effects Can be Mitigated...

The sections in this CEQA document on cultural resources need to be revised to reflect the presence of an archeological site within Del Paso Park less than 1-mile from the project site. The depth and boundaries of the site registered as CA-Sac-201 have not been precisely characterized, but it is possible that the site underlays Bridge Road near the crossing at Arcade Creek, and portions of the Renfree Field parking lot to the east, and Owl Creek Terrace to the west. In 2012, ICF prepared an environmental study for the Roseville Road Bridge Replacement Project, and made the following finding about the archeological site:

*"...(A) previously recorded prehistoric archaeological site, CA-Sac-201, was identified within 1 mile of the project site and is directly relevant for assessing the sensitivity of the project site. Geomorphological data in the area of CA-Sac-201 suggest that there is moderate potential for buried archaeological deposits to be present in the project vicinity, for two reasons. First, CA-Sac-201 and the project site share the same soil*

*type. Second, CA-Sac-201 is buried under 9 feet of alluvium, which is within the proposed depth of construction for the creek realignment.”*

ICF March 2012

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*Initial Study/Mitigated Negative Declaration*

*Roseville Road Bridge Replacement Project*

*(T15068500)*

[http://sacramento.granicus.com/MetaViewer.php?view\\_id=22&clip\\_id=2934&meta\\_id=381576](http://sacramento.granicus.com/MetaViewer.php?view_id=22&clip_id=2934&meta_id=381576)

In 1984, the City first recognized the presence of CA-Sac-201 when it was preparing the in the EIR for the Master Plan for Del Paso Regional Park. However, the City has chosen not to conserve or celebrate the archeological resources in the area. Furthermore, the City has never engaged with the tribal communities in the region to formulate a proper stewardship framework for CA-Sac-201.

United Auburn Indian Community

<https://www.auburnrancheria.com/about-us/tribal-council/>

Securing and restoring CA-Sac-201 would honor the cultural history of Arcade Creek, and would add great value to the Park’s portfolio of assets. A relevant example of what could be done at Del Paso Regional Park is the conceptual restoration plan for the Ohlone Shellmound in West Berkeley depicted in the link below.

*Ohlone Heritage Site and Sacred Grounds*

<https://shellmound.org/learn-more/ohlone-vision/>

*There Were Once More Than 425 Shellmounds in the Bay Area: Where Did They Go?*

Please see the conceptual restoration plan for the Shellmound at 4th Street

<https://www.kqed.org/news/11704679/there-were-once-more-than-425-shellmounds-in-the-bay-area-where-did-they-go>

There is an ongoing land-use dispute over the historic Shellmound in West Berkeley that demonstrates that indigenous people remain concerned with their sacred sites, even if they seem completely ruined to non-tribal observers. The City of Sacramento has a unique opportunity at Del Paso Regional Park to acknowledge and conserve the important cultural resources of the Valley Nisenan Maidu and their ancestors.

*West Berkeley Shellmound is now Considered one of the Eleven Most Endangered Historic Places in the U.S.*

<https://www.berkeleyside.com/2020/09/25/west-berkeley-ca-shellmound-most-endangered-historic-places-national-trust-historic-preservation>



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SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION  
HYDROLOGY AND WATER QUALITY  
(B) No Additional Significant Effect  
MITIGATION MEASURES

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SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION  
14. UTILITIES AND SERVICE SYSTEMS  
ANSWERS TO CHECKLIST QUESTIONS  
(A, B) No Additional Significant Effect.

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SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION  
MANDATORY FINDING OF SIGNIFICANCE  
(C) No Additional Significant Effect

Re: the passages in the CEQA document:

*“The Project would not...alter the existing drainage pattern.”*

*“The Project would don't (sic) substantially increase the amount or rate of surface runoff...”*

*“There are no required mitigation measures for this Project relating to Hydrology and Water Quality.”*

The discharge of trash and contaminated drainage from the existing bridge contributes to the degradation of water quality and habitat in Arcade Creek on an ongoing basis. This is not an acceptable condition with the existing bridge, and it is not an acceptable outcome when the new bridge is built.

The CEQA document should acknowledge the cumulative adverse effects of contaminated drainage and trash being discharged into the creek from all of the bridges in the vicinity that were collectively built by the City, County, and the State (e.g., Bridge Road, SR-51, Watt Avenue, and the Softball Complex Access Bridge). These bridge crossings have permanently fragmented the aquatic and terrestrial habitats of the watershed, and have had a devastating, adverse effect on the ecology of Arcade Creek. Furthermore, the ongoing discharges of contaminants and trash from the bridges are further degrading the water quality in one of the most impaired waterbodies in the Sacramento Valley.

TMDL Projects - Sacramento County Urban Creeks (updated 2020)

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/tmdl/central\\_valley\\_projects/urban\\_creeks/index.html#EPA](https://www.waterboards.ca.gov/centralvalley/water_issues/tmdl/central_valley_projects/urban_creeks/index.html#EPA)

*Water Quality Progress Report*

*Sacramento County Urban Creeks – Diazinon and Chlorpyrifos (EPA, 2004)*

<https://www.epa.gov/sites/production/files/2015-07/documents/4-sac-county-urban-creeks-opp-tmdl-implementation-report-2015-06-15.pdf>

The City should make this bridge replacement project a model for “low impact development” (LID) where cost-effective technologies and “green infrastructure” are incorporated into the design to eliminate the ongoing discharges of contaminated drainage and trash.

The new structure should be able to:

- (i) trap and sequester trash so that it never enters the waterbody;
  - (ii) slow-down, filter, retain, and recharge stormwater runoff with rocky structures, bioswales, wetlands, and retention basins so that street runoff is held within the vicinity of the project site, and discharged slowing into the creek and its groundwater aquifer.
- The references below demonstrate that these technologies and approaches are widely accepted and already being used extensively by transportation agencies, utility departments, and the civil engineering community:

US DOT - Green Transportation Infrastructure (2007)

Please scroll down to see: *Management of Highway Stormwater Runoff*

<https://www.transportation.gov/testimony/green-transportation-infrastructure-challenges-access-and-implementation>

*Banking on Green: Green Infrastructure Can Save Municipalities Money*

Please see pages 13-15 re: Cost-effective Street Reconstruction

[https://www.asla.org/uploadedFiles/CMS/Government\\_Affairs/Federal\\_Government\\_Affairs/Banking%20on%20Green%20HighRes.pdf](https://www.asla.org/uploadedFiles/CMS/Government_Affairs/Federal_Government_Affairs/Banking%20on%20Green%20HighRes.pdf)

*How to Filter 2 million gallons of stormwater from the Aurora Bridge*

<https://www.nature.org/en-us/about-us/where-we-work/united-states/washington/stories-in-washington/filtering-stormwater/>

*Trash Capture Technologies*

<https://www.epa.gov/trash-free-waters/trash-capture-technologies>

*City of Los Angeles - Clean Water Initiative Update (2018)*

Page 18: Rory M. Shaw Wetlands Park

Page 21: Peck Park Canyon Enhancement

Page 34: Broadway Neighborhood Stormwater Greenway

Page 36: Catch Basin Inserts...

[https://www.lacitysan.org/cs/groups/sg\\_sw/documents/document/y250/mdi2/~edisp/cnt026384.pdf](https://www.lacitysan.org/cs/groups/sg_sw/documents/document/y250/mdi2/~edisp/cnt026384.pdf)

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SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION  
RECREATION  
ENVIRONMENTAL SETTING

The acreage figure for the Regional Park should be corrected per the City's own website (624.36 acres NOT 145.61 acres). Furthermore, the CEQA document should explain that ~100 acres of the Regional Park have been designated as Natural Areas per two unanimous resolutions by the City Council in 1985 and 2002. Along with the three Natural Areas cited in this section, a fourth Natural Area (the "Arcade Creek Natural Area") protects the riparian corridor from the Auburn Blvd. Bridge and westward nearly to the Roseville Road Bridge.

*Del Paso Regional Park*

<https://www.cityofsacramento.org/ParksandRec/Parks/Park-Directory/Arden-Arcade/Del-Paso-Regional-Park>

In 2020, a conservation proposal was submitted to the City to extend Natural Area protections to the remaining, unprotected reach of Arcade Creek within Del Paso Regional Park — bounded by the 18th tee on the "Arcade Creek Golf Course", and the CDFW-mandated mitigation area for the Roseville Road Bridge Replacement.

Please see the image above depicting the pedestrian bridge at the 18th hole (page 3 of this comment letter, *Arcade Creek Hole #18 - Beware of the Double Cross*), and Figure 5 below from the CEQA document for the Roseville Road Bridge Replacement that shows the westernmost portion of this stream reach. The goal behind the conservation proposal is to restore the riparian forest within Haggin Oaks Golf Course so the entire stretch of Arcade Creek within Del Paso Regional Park is conserved and managed for water quality and biodiversity.

*Natural Communities and Development in the Project Area* (Page 78 of 159)

[http://sacramento.granicus.com/MetaViewer.php?view\\_id=22&clip\\_id=2934&meta\\_id=381576](http://sacramento.granicus.com/MetaViewer.php?view_id=22&clip_id=2934&meta_id=381576)

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SECTION III - ENVIRONMENTAL CHECKLIST AND DISCUSSION  
13. TRIBAL CULTURAL RESOURCES  
ANSWERS TO CHECKLIST QUESTIONS  
(Ai, Aii) Effects Can be Mitigated...

It would be worthwhile to look for any artifacts that might be excavated from the nearly forgotten "Funland Amusement Park" that operated in Del Paso Park through the late 1960s. Featured attractions included a merry-go-round and miniature train, and there may be train-related artifacts within the project area. While such artifacts would not qualify as cultural resources, *per se*, anything found might be valuable to Sacramento historians.



**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

**Response to Comments for Comment Letter #3**

<b>Tim Vendlinski Arcade Creek Restoration Project</b>		
<b>Comment Number/ Location</b>	<b>Comment/Recommendation Summary</b>	<b>Response To Comment</b>
#1, Page 1	The CEQA document should disclose that the size of study area for the project at the beginning of the document.	Disclosed the 10.4 acre size of the Project area at the beginning of the document under the Project Location subheader. The 6.4 acre study area included in the Tree Survey Report differs from the total project area due to addition of the staging areas on the paved Powerhouse Science Center and Renfree Field parking lots.
#2, Page 1-2	Figures indicate that the project area will include the unpaved Owl Creek Terrace immediately west, and contiguous with, Bridge Road. This is the historic floodplain of Owl Creek and has a known history of saturated soils and ponding water. This area should not be considered for, or used as, a staging area for the project. An ongoing complaint has been filed against the City with CalEPA and the Central Valley Regional Water Quality Control Board for past actions at this site.	The Owl Creek Terrace located immediately west, and contiguous with, Bridge Road is no longer considered for use as part of the Project area and has been removed from project figures. Staging for the Project will not occur within the Owl Creek Terrace and would be located at the northeast corner of the Auburn Boulevard and Winding Way intersection and within the closed, paved parking lot for Renfree Field and vacant paved parking lot used for the Powerhouse Science Center.
#3, Page 2	The project should consider using the paved parking lot for Renfree Field, immediately east and contiguous with Bridge Road, instead of the Powerhouse parking lot.	The closed Renfree Field paved parking lots has been added as a potential staging area for the proposed project, and the ISMND and associated figures have been revised accordingly.
#4, Page 2-3	The City should install a pedestrian/equestrian crossing along Arcade Creek 200 feet downstream of the Auburn Blvd. Bridge.	The addition of a separate pedestrian/ equestrian bridge downstream of Auburn Boulevard across from Arcade Creek is out of the scope of the proposed bridge replacement project. The purpose of the Project is to replace the existing bridge over Arcade Creek and provide a new structure that is consistent with current design standards for roadway geometry, accessibility, and structural integrity; to increase hydraulic capacity; and to update the Auburn Boulevard and Winding Way

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

		intersection to enhance pedestrian safety and improve the existing intersection operations. A temporary pedestrian detour path would be constructed approximately 100 feet upstream of the existing bridge to provide access over Arcade Creek for the duration of Project construction; however, the temporary pedestrian bridge and associated pathway would be removed upon the completion of Project construction.
#5 Page 3	The CEQA document must mention that the City Council passed resolutions to conserve a total of 100-acres within Del Paso Regional Park and provide acreage for the project study area.	A discussion of the Del Paso Regional Park Master Plan and associated developments and preserved areas within the park has been included under the land use subsection on page 10 of the document. Reference response to comment #1, acreage of the project area was added to project location subheader at the beginning of the document.
#6 Page 4	Non-native grasses should not be used for erosion control. The City should order grass plugs and/or seeds from Hedgerow Farms derived from regional grass populations, if possible.	Non-native grasses will not be used in the erosion control mix. A native seed mix will be provided in the final engineering specs and the contractor will be responsible for finding a suitable nursery which carries the required mix.
#7 Page 4	Portraying the condition of habitat within the watershed as "very poor" without providing a credible context for how it got that way, is inconsistent with the spirit of CEQA. This portrayal implies that something is intrinsically wrong with the Creek and Park, and that it lacks value to the community and society as a whole.	The quality of habitat within the BSA has been described as very poor, not within the watershed. In addition, while it may have value to the community and society, it does not have value to any special-status wildlife species other than as a movement corridor to more suitable habitat upstream or downstream of the BSA.
#8 Page 5	The Western Pond Turtle was still present in Arcade Creek in the late 1970s, and it might still be present today.	Thank you for the information. This was included in the technical studies but is not needed in the CEQA document. The City acknowledges turtles may be present as Arcade Creek could provide a movement corridor.
#9 Page 5	This CEQA document must indicate the presence of Chinook salmon within the project area and must ensure that standard mitigation measures for anadromous fishes are tailored to the site-specific conditions within Arcade Creek. This document should acknowledge the presence of non-anadromous, native inland fishes that persist in Arcade Creek despite the large-scale habitat destruction, and the contamination of its surface waters.	The City went through consultation with NOAA Fisheries and it was determined that the project would have no effect on chinook salmon. The City acknowledges the potential for steelhead to be moving through the area, and the appropriate mitigation measures are included. The purpose of the document is not to discuss common aquatic and terrestrial species however it is assumed that those will be present. The mitigation measures for steelhead will also protect any native fish species that may be present.
#10 Page 6	The Nesting Songbirds and Raptors needs to be revised and significantly	This is not a requirement of the CEQA document; furthermore, specific locations are not included in a public document as this will



**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
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	expanded to incorporate a more comprehensive dataset generated by the Sacramento Audubon Society. Swainson's hawks were observed within 0.50 miles of the project site, immediately southeast of the intersection at Winding Way @ Auburn Blvd.	allow for the disturbance and/or decimation of recorded species. The City acknowledges the potential for Swainson's hawk, white-tailed kite and other nesting raptors and songbirds and the appropriate mitigation measures to protect these species are included.
#11 Page 6	Native trees in the project area include Interior Live Oak and Blue Oak, a species endemic to California and locally rare. Canyon Live Oak is probably not present in the project area.	Thank you for that information. This species was removed from the description.
#12 Page 7	The temporal and permanent impacts to riparian habitat on the main-stem of Arcade Creek should be mitigated onsite by re-aligning, re-vegetating, and securing the unnamed tributary to Arcade Creek within the Del Paso Park picnic area.	While this is a good suggestion, it is not part of the project and would be a separate project in itself.
#13 Page 7	The CEQA document needs to identify which 30 of the 93 trees need to be removed for the bridge replacement project. Tree removals should be included in survey figures and the tree survey table.	Tree removals are not included in the survey report, this was not the purpose of the report. The report was prepared to identify the number and locations of the trees within the entire project area. Therefore, the survey figures and tables will not be updated. A restoration plan has been prepared for this project.
#14 Page 7-8	Please delete the sentence: "The Project site is not located within an established native resident or migratory wildlife corridor or wildlife nursery site." Arcade Creek and Del Paso Regional Park are both nursery areas for fish and wildlife and known corridors for wildlife dispersal. The document should account for, and mitigate, any potential adverse impacts species that occupy habitat in the vicinity of the project area.	This sentence is correct. While portions of Arcade Creek and Del Paso Regional Park may be considered as "native resident or migratory wildlife corridor or wildlife nursery site", the project site itself is not. The project site is not recognized as an established native resident or migratory wildlife corridor or wildlife nursery site by the regulatory agencies.
#15 Page 8	Mitigation Measure BIO-2: Protect Central Valley Steelhead should be implemented by restoring the main-stem of Arcade Creek, and the unnamed tributary nearby, to benefit both Central Valley Steelhead and Chinook salmon.	That is not a mitigation measure. The mitigation measures included in the CEQA document were developed in consultation with NOAA Fisheries. Restoration of this area would be a separate project.
#16 Page 8	When non-native shrubs and trees (e.g., Zelkova serrata) are encountered in and around the project area, they should be completely removed and treated with herbicide rather than just trimmed and left in place.	Herbicides are not allowed by the regulatory agencies to be used within the vicinity of a water body. The contractor will be responsible for tree removal and the City can put a spec in the bid document stating that the stumps be removed as well as having this as a measure in the required permits.

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
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<p>#17 Page 9-11</p>	<p>Please do not buy credits from a mitigation bank. The City has the opportunity to leverage the compensatory mitigation requirements toward the restoration of Arcade Creek. The restoration design should incorporate the findings and recommendations of scientists for the maximum benefit of resident and migratory birds and fishes.</p>	<p>While this is a good suggestion, it is not feasible for a number of reasons. The City would have to protect that area 'in perpetuity' which would require a large amount of funds. In addition, due to the current conditions at the site, long-term monitoring at the mitigation site would be unsafe and there is the potential for vandalism due to the surrounding development. Lastly, the project area is not large enough to accommodate on-site mitigation as only the areas that would be impacted were studied. As mentioned above, the restoration of Arcade Creek is an entirely separate project. However, the City may evaluate implementing or funding a project through a local organization that would directly benefit the Arcade Creek corridor or citizens of the City. A restoration plan for the temporarily impacted areas will be prepared during permitting and will include hydroseeding with a native riparian seed mix and planting native riparian trees.</p>
<p>#18 Page 11-12</p>	<p>A compensatory mitigation plan should be developed for the project to both restore conditions on the project site, and to compensate for unavoidable impacts at the project site by restoring the unnamed tributary within the picnic area.</p>	<p>A restoration plan for the temporarily impacted areas will be prepared during permitting and will include hydroseeding with a native riparian seed mix and planting native riparian trees. As mentioned above, restoration of Arcade Creek and the unnamed tributary would be a separate project. However, The City may evaluate implementing or funding a project through a local organization that would directly benefit the Arcade Creek corridor or citizens of the City</p>
<p>#19 Page 13-14</p>	<p>The CEQA document on cultural resources needs to be revised to reflect the presence of an archeological site within Del Paso Park less than 1-mile from the project site. The depth and boundaries of the site registered as CA-Sac-201 have not been precisely characterized, but it is possible that the site underlays Bridge Road near the crossing at Arcade Creek, and portions of the Renfree Field parking lot to the east, and Owl Creek Terrace to the west.</p>	<p>The Area of Potential Effects (APE) and ADI (Area of Direct Impact) were developed in coordination with the City and Caltrans and were established following guidelines set forth in the Caltrans PA Attachment 3. The presence of CA-SAC-201 was noted in the record search prepared for the project; however, the project would not directly impact the site. Additionally, pursuant to Section 106 PA Stipulation IX.A and as applicable PRC 5024 MOU Stipulation IX.A.2, has determined a Finding of No Historic Properties Affected is appropriate for this undertaking</p>
<p>#20 Page 15</p>	<p>The discharge of trash and contaminated drainage from the existing bridge contributes to the degradation of water quality and habitat in Arcade Creek on an</p>	<p>Thank you for your comment, the City acknowledges this is an on-going problem and routinely has their maintenance department clean up these areas.</p>

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
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	ongoing basis. This is not an acceptable condition with the existing bridge, and it is not an acceptable outcome when the new bridge is built. The document should acknowledge the cumulative adverse effects of contaminated drainage and trash being discharged into the creek from all of the bridges in the vicinity.	
#21 Page 16	The City should make this bridge replacement project a model for "low impact development" (LID) where cost-effective technologies and "green infrastructure" are incorporated into the design to eliminate the ongoing discharges of contaminated drainage and Trash.	Comment noted.
#22 Page 17	The acreage figure for the Regional Park should be corrected per the City's own website (624.36 acres NOT 145.61 acres).	Acreage of Del Paso Regional Park has been revised to 624.4 acres.
#23 Page 17	The CEQA document should explain that ~100 acres of the Regional Park have been designated as Natural Areas.	Added discussion of permanently preserved natural areas per the Del Paso Park Master Plan.
#24 Page 17	It would be worthwhile to look for any artifacts that might be excavated from the nearly forgotten "Funland Amusement Park" that operated in Del Paso Park through the late 1960s. While such artifacts would not qualify as cultural resources, per se, anything found might be valuable to Sacramento historians.	Comment noted.



October 4, 2020

**SENT VIA EMAIL**

Ron Bess, Associate Planner  
City of Sacramento Community Development Department  
300 Richards Boulevard, 3<sup>rd</sup> Floor  
Sacramento, CA 95811

**RE: Auburn Boulevard over Arcade Creek Bridge Replacement  
(SCH# 2020099008)**

Dear Mr. Bess:

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the Mitigated Negative Declaration (MND) for the Auburn Boulevard over Arcade Creek Bridge Replacement project, consisting of the replacement of the existing structurally deficient bridge with a new bridge that meets current structural and geometric design standards, improves hydraulic capacity, and provides traffic-rated barrier railings. We offer the following comments and recommendations on project site considerations related to air quality.

- All projects are subject to Sac Metro Air District rules and regulations at the time of construction, and are required to implement our Basic Construction Emission Control Practices (BCECP). We recommend including the entire BCECP as mitigation in the MND. Please visit our website to find [a list of the most common rules that apply at the construction phase of projects](#), and a copy of our [BCECP](#).
- The MND indicates that project roadway construction emissions modeling assumed that all on-road haul trucks used for the project would have 2010 or newer model engines. Therefore, the MND should include a mitigation measure that explicitly requires use of 2010 or newer diesel engines for all on-road haul trucks associated with project construction.
- Sac Metro Air District has updated its [Enhanced On-Site Exhaust Controls](#) and we recommend including the full specifications of these controls into Mitigation Measure (MM) AQ-1.
- We commend the inclusion of enhanced fugitive particulate matter (PM) dust control practices into MM AQ-2, corresponding with Sac Metro Air District's [Enhanced Fugitive PM Dust Control Practices](#).
- Because this project includes demolition, we recommend paying particular attention to [Rule 902](#), regarding asbestos containing materials, in the referenced list of common

## Auburn Boulevard over Arcade Creek Bridge Replacement

October 4, 2020

rules that apply at the construction phase of projects. Sac Metro Air District staff is available weekdays between 8:00 and 10:00 a.m. to review notifications and answer asbestos related questions, either by emailing [asbestos@airquality.org](mailto:asbestos@airquality.org) or calling 916-874-4800.

- For clear disclosure of project impacts on or benefits to sustainable, non-polluting transportation, the MND should provide a more specific description of the project's pedestrian and bicycle improvements. This description should include information on where its added crosswalks will be located, and what pedestrian safety features are included in the crosswalks and sidewalks constructed as part of the project. There are two slip lanes on the southern leg of the intersection of Winding Way and Auburn Boulevard, and this configuration does not create optimally safe pedestrian conditions, because it facilitates higher vehicle speeds and necessitates further crossing distances over motor vehicle lanes for pedestrians. Therefore, it is particularly important to provide full, clear disclosure of project impacts on or benefits to sustainable transportation for this project.

Thank you for your attention to our comments and recommendations. If you have questions about them, please contact me at [mwright@airquality.org](mailto:mwright@airquality.org) or 916-874-4207.

Sincerely,



Molly Wright, AICP  
Air Quality Planner / Analyst

c: Paul Philley, AICP, Sac Metro Air District

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

**Response to Comments for Comment Letter #4**

<b>Molly Wright Sacramento Metropolitan Air Quality Management District</b>		
<b>Comment Number/ Location</b>	<b>Comment/Recommendation Summary</b>	<b>Response To Comment</b>
#1 Page 1	All projects are subject to Sac Metro Air District rules and regulations at the time of construction, and are required to implement our Basic Construction Emission Control Practices (BCECP). We recommend including the entire BCECP as mitigation in the MND.	Updated BCECP measures have been incorporated into Mitigation Measure AQ-1 and AQ-2 of the Project ISMND.
#2 Page 1	The MND indicates that project roadway construction emissions modeling assumed that all on-road haul trucks used for the project would have 2010 or newer model engines. Therefore, the MND should include a mitigation measure that explicitly requires use of 2010 or newer diesel engines for all on-road haul trucks associated with project construction.	The "Use of 2010 or newer diesel engines for all on-road haul trucks associated with Project construction" measure has been added to Mitigation Measure AQ-1 of the Project ISMND.
#3 Page 1	Sac Metro Air District has updated its Enhanced On-Site Exhaust Controls and we recommend including the full specifications of these controls into Mitigation Measure (MM) AQ-1.	Updated Mitigation Measure AQ-1 to be consistent with SMAQMD Enhanced On-Site Exhaust Controls.
#4 Page 1	We commend the inclusion of enhanced fugitive particulate matter (PM) dust control practices into MM AQ-2.	Updated Mitigation Measure AQ-2 to be consistent with SMAQMD enhanced fugitive particulate matter dust control practices.
#5 Page 1-2	Because this project includes demolition, we recommend paying particular attention to Rule 902, regarding asbestos containing materials, in the referenced list of common rules that apply at the construction phase of projects.	Added a specific reference to adherence with SMAQMD Rule 902 to Mitigation Measure HAZ-2 and the abatement and disposal of hazardous materials associated with the Project.
#6 Page 2	The MND should provide a more specific description of the project's pedestrian and bicycle improvements. This description should include information on where its added crosswalks will be located, and what pedestrian safety features are included in the crosswalks and sidewalks constructed as part of the project.	Added a description of pedestrian and bicycle improvements to the Project Description section of the ISMND. Final pedestrian and bicycle signage, markings, and facility information will be determined during final design of the project.





10060 Goethe Road  
Sacramento, CA 95827-3553  
Tel 916.876.6000  
Fax 916.876.6160  
[www.sacsewer.com](http://www.sacsewer.com)

October 5, 2020

Ron Bess  
City of Sacramento  
Community Development Department  
300 Richards Boulevard, 3<sup>rd</sup> Floor  
Sacramento, CA 95811

**Application: Auburn Boulevard Over Arcade Creek Bridge Replacement Project**

Dear Mr. Bess,

The Sacramento Area Sewer District (SASD) has reviewed the Notice of Availability / Intent to Approve the Draft Mitigated Negative Declaration for the Auburn Boulevard Over Arcade Creek Bridge Replacement Project.

We expect that if the Project is subject to currently established policies, ordinances, fees, and to conditions of approval, then mitigation measures within the EIR will adequately address the sewage aspects of the project. We anticipate a less than significant impact to the sewage facilities due to mitigation, however an encroachment permit may be required.

If you have any questions regarding these comments, please call me at 916-876-9991 or Yadira Lewis 916-876-6336.

Sincerely,

*Haley MacGowan*

Haley MacGowan, EIT  
SASD Development Services

**Board of Directors**

Representing:

County of Sacramento | City of Citrus Heights  
City of Elk Grove | City of Folsom  
City of Rancho Cordova | City of Sacramento

**Prabhakar Somavarapu**

District Engineer

**Rosemary Clark**

Director of Operations

**Christoph Dobson**

Director of Policy & Planning

**Matthew Doyle**

Director of Internal Services

**Joseph Maestretti**

Chief Financial Officer

**Nicole Coleman**

Public Affairs Manager

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

**Response to Comments for Comment Letter #5**

**Haley MacGowan  
SASD Development Services**

**Response To Comment**

**Acknowledge that SASD has reviewed and approved of the findings of the ISMND, and that an encroachment permit would be required for any relocations of SASD facilities.**

**From:** [Teri Burns](#)  
**To:** [Ron Bess](#)  
**Cc:** [bluevelvet@yahoo.com](mailto:bluevelvet@yahoo.com); [Missy Worthley-Peterson](#); [Sondra Betancourt](#)  
**Subject:** Notice of Availability/Intent to Approve the Auburn Boulevard over Arcade Creek Mitigated Negative Declaration.  
**Date:** Monday, October 5, 2020 2:32:06 PM

---

On behalf of the Sacraments Horsemen's Association, I write to share that we were of the impression this project might include a separate pedestrian/ equestrian bridge slightly down stream from Auburn Blvd.

Since it isn't included here we continue to advocate for such a bridge across Arcade Creek.

We also request installation of secondary crosswalk buttons higher up on polls so that riders need not dismount to engage the walk signal across Auburn. As part of that crossing issue, we request clear areas be available on each side where horses can safely stand while waiting for the crossing signal.

Thank you for your consideration.

Teri Burns  
916-802-8343

Sent from my Motorola Smartphone

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

**Response to Comments for Comment Letter #6**

<b>Teri Burns Sacramento Horsemen's Association</b>		
<b>Comment Number/ Location</b>	<b>Comment/Recommendation Summary</b>	<b>Response To Comment</b>
#1 Page 1	A separate pedestrian/ equestrian bridge should be included in the project slightly downstream from Auburn Blvd to cross Arcade Creek.	The addition of a separate pedestrian/ equestrian bridge downstream of Auburn Boulevard across Arcade Creek is out of the scope of the proposed bridge replacement project. The purpose of the Project is to provide a new structure along Auburn Boulevard that is consistent with current design standards for roadway geometry, accessibility, and structural integrity; to increase hydraulic capacity; and to update the Auburn Boulevard and Winding Way intersection to enhance pedestrian safety and improve the existing intersections operations. A temporary pedestrian detour path would be constructed approximately 100 feet upstream of the existing bridge to provide access over Arcade Creek for the duration of Project construction; however, the temporary pedestrian bridge and associated pathway would be removed upon the completion of Project construction.
#2 Page 1	Secondary crosswalk buttons should be installed higher up on polls so that riders need not dismount to engage the walk signal across Auburn Blvd.	Intersection facilities will be determined during final design of the Project and would adhere to existing City, AASHTO and Caltrans design criteria and standards.
#3 Page 1	Clear areas should be made available on each side of the Auburn Blvd. crosswalks so horses can safely stand while waiting for the crossing signal.	Intersection facilities will be determined during final design of the Project and would adhere to existing City, AASHTO and Caltrans design criteria and standards.

**From:** [Wood, Dylan@Wildlife](mailto:Wood_Dylan@Wildlife)  
**To:** [Ron Bess](#)  
**Cc:** [Wildlife R2 CESA](#); [state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)  
**Subject:** Comments on the MND for the Auburn Boulevard Bridge Replacement Project (SCH# 2020099008)  
**Date:** Monday, October 5, 2020 6:52:41 PM  
**Attachments:** [image001.png](#)

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Dear Mr. Bess:

RE: Auburn Boulevard Bridge Replacement Project (PROJECT)  
MITIGATED NEGATIVE DECLARATION (MND) SCH# 2020099008

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from the City of Sacramento (the City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>[1]</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

## **CDFW ROLE**

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

## **PROJECT DESCRIPTION SUMMARY**

The proposed project consists of the replacement of the existing structurally deficient bridge with a new bridge that meets current structural and geometric design standards, improves hydraulic capacity, and provides traffic-rated barrier railings. The proposed bridge replacement would also enhance the Auburn Boulevard and Winding Way intersection by adding an additional left turn pocket from westbound Auburn Boulevard to Winding Way. The proposed replacement bridge would be a single span precast-prestressed concrete girder bridge, placed along the existing bridge alignment. The proposed bridge would be approximately 97 feet in width and would provide two 12-foot through lanes, two 11-foot through lanes, two 11-foot left turn lanes, and shoulders and sidewalks in each direction. The length of the proposed bridge would be approximately 89 feet to avoid the existing bridge foundations.

## **COMMENTS AND RECOMMENDATIONS**

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document or facilitate an effective environmental review process. Where CDFW recommends specific revisions to the MND, deletions are marked with a strikethrough (~~example~~) while additions are marked as underlined (example).

**Comment 1: BIO-1 revisions needed to mitigate impacts to Sanford's arrowhead a level of less-than-significant.**

BIO-1 describes mitigation for potential impacts to Sanford's arrowhead (*Sagittaria sanfordii*); however, portions of this measure not specific enough to adequately assess plants within the project area or respond in the event plants are found during project surveys. As Sanford's arrowhead is a rhizomatous plant, there are situations where physical disturbances to the plant may be more advantageous than relocating the plant out of the project area, depending on the type of impact resulting from the project activity<sup>2</sup>.

To address this comment, CDFW recommends revising the MND with the following language:

*A qualified biologist shall conduct a preconstruction survey for Sanford's arrowhead during the plant's blooming period (May-October) within 30 days prior to construction. If Sanford's arrowhead is not found, then no further measures are necessary. If Sanford's arrowhead is found in the Project site BSA, CDFW will be notified at least ten days prior to dewatering or construction impacts in the vicinity of Sanford's arrowhead in accordance with the California Native Plant Protection Act of 1977 (2 FGC § 1900-1913) to allow sufficient time to transplant the individuals to a suitable location. In consultation with CDFW, the City shall develop a Sanford's arrowhead avoidance, minimization, or relocation plan. The plan shall evaluate project impacts on the project area's population of Sanford's arrowhead and propose a scientifically supported response procedure.*

**Comment 2: BIO-4 revisions suggested to improve mitigation for potential impacts to Swainson's hawk.**

CDFW recommends the following revisions to BIO-4 to improve the MND:

*Mitigation Measure BIO-4: Conduct Preconstruction Surveys for Swainson's Hawk. Prior to construction, surveys will be conducted by a qualified biologist to determine presence/absence of nesting Swainson's hawk in and within 0.50 miles of the Project site according to the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (CDFG, 2000). If no Swainson's hawks are found during any of the surveys, no further mitigation will be necessary. If Swainson's hawk nests are found, the City shall develop an avoidance plan in consultation with CDFW ~~CDFW will be consulted~~ regarding measures to reduce the likelihood of forced fledging of young or nest abandonment by adult birds. These measures will likely include, but are not limited to, the establishment of a no-work zone around the nest until the young have fledged as determined by a qualified*



biologist, biological monitoring, noise attenuating barriers, and/or construction best practices. In the event take of Swainson's hawk cannot be avoided, the project proponent may seek related take authorization as provided by the Fish and Game Code.

**Comment 3: BIO-5 revisions needed to mitigate impacts to nesting birds to a level of less-than-significant.**

BIO-5 describes preconstruction surveys for nesting migratory birds. For clarity during implementation, this measure should define the survey methodology more clearly for the potential nesting birds that may be encountered on the project site.

To address this concern, CDFW recommends revising the MND with the following language:

*Nests in Trees and Shrubs*

- *Avoid Active Nesting Season. Implement the following to ensure impacts to tree and shrub nesting species remain less than significant.*
  - o *If feasible, conduct all tree and shrub removal and grading activities during the non-breeding season (generally September 1 through January 31).*
  - o *If grading and tree removal activities are scheduled to occur during the breeding and nesting season (February 1 through August 31), perform preconstruction surveys prior to the start of Project activities.*
- *Conduct Preconstruction Nesting Bird Surveys. If construction, grading, or other Project-related activities are schedule during the nesting season (February 1 to August 31), preconstruction surveys for other migratory bird species shall take place ~~no less than 14 days and no more than 30 days prior to the beginning of construction within 250 feet of suitable nesting habitat.~~ greater than 15 days prior to the start of project activities. Surveys will include a search of all trees and shrubs, marsh, wetland, manmade structures, and ruderal vegetation that provide suitable nesting habitat in the project area including staging and stockpile areas. The minimum survey radii surrounding the work area shall be the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; iii) 1,000 feet for larger raptors such as buteos; 1,320 feet for fully protected species such as white-tailed kite. If the preconstruction surveys do not identify any nesting migratory bird species within areas potentially affected by construction activities, no further mitigation will be required.*
- *Avoid Active Bird Nest Sites. If active nests are found, avoid project-related construction impacts by establishing appropriate no-work buffers to limit Project related construction activities near the nest site. Determine the size of the no work buffer zone to avoid take of nesting birds in consultation with a qualified biologist and CDFW although use a 500-foot buffer when possible. Delineate the no work buffer zone with highly visible temporary construction fencing or flagging. In consultation with CDFW, monitoring of nest activity by a qualified biologist may be required if the project-related construction activity has potential to adversely affect the nest or nesting behavior of the bird. Do not commence project-related construction activity within the no work buffer area until a qualified biologist and CDFW confirms that the nest is no longer active. If it is determined during surveys or project implementation that project activities may impact white-tailed kite, project personnel shall fully avoid any impacts that may result in take if white-tailed kite is observed to be utilizing the*

project area or adjacent area.

**Comment 4: BIO-7 revisions suggested to improve mitigation for potential impacts to riparian habitat.**

BIO-7 proposes City compensation for permanent removal of riparian habitat. While purchasing bank credits is typically acceptable for compensation, BIO-7 may lock the City in to a narrow mitigation strategy since there are limited CDFW-approved banks with a service area overlapping with the project location. That said, the City may consider implementing or funding a project through a local organization that would directly benefit the Arcade Creek corridor or citizens of the City rather than funnel mitigation funding offsite.

CDFW recommends the following revisions to BIO-7 to improve the MND:

*To compensate for the permanent removal of riparian vegetation associated with the bridge construction, the City shall ~~mitigate purchase credits from a Corps and/or CDFW approved mitigation bank~~ at a minimum 3:1 ratio (three acres of habitat replaced for every one acre removed). Compensation make take the form of permanent protection, enhancement, or restoration of suitable habitat, purchase of credits at a Corps and CDFW-approved bank or conservation site, or through funding an equivalent project through a local organization.*

**ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental documents be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>. The completed form can be sent electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov).

**FILING FEES**

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

**CONCLUSION**

CDFW appreciates the opportunity to comment on the MND to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this email or further coordination should be directed to Dylan Wood, Environmental Scientist at 916-358-2384 or [dylan.a.wood@wildlife.ca.gov](mailto:dylan.a.wood@wildlife.ca.gov).

Sincerely,  
**Dylan Wood**

California Department of Fish and Wildlife  
Environmental Scientist  
(916) 358-2384



References:

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000

[2] South Sacramento Habitat Conservation Plan (Sacramento County 2018)

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[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

**Response to Comments for Comment Letter #7**

<b>Dylan Wood California Department of Fish and Wildlife</b>		
<b>Comment Number/ Location</b>	<b>Comment/Recommendation Summary</b>	<b>Response To Comment</b>
#1 Page 2	BIO-1 describes mitigation for potential impacts to Sanford's arrowhead ( <i>Sagittaria sanfordii</i> ); however, portions of this measure not specific enough to adequately assess plants within the project area or respond in the event plants are found during project surveys. CDFW provides recommended revised language for the BIO-1 mitigation measure.	Revised as recommended.
#2 Page 2-3	CDFW provides recommended revised language for the BIO-4 mitigation measure.	Revised as recommended.
#3 Page 3-4	BIO-5 describes preconstruction surveys for nesting migratory birds. For clarity during implementation, this measure should define the survey methodology more clearly for the potential nesting birds that may be encountered on the project site. CDFW provides recommended revised language for the BIO-5 mitigation measure.	Revised as recommended.
#4 Page 4	BIO-7 may lock the City in to a narrow mitigation strategy since there are limited CDFW-approved banks with a service area overlapping with the project location. The City may consider implementing or funding a project through a local organization that would directly benefit the Arcade Creek corridor or citizens of the City rather than funnel mitigation funding offsite. CDFW provides recommended revised language for the BIO-7 mitigation measure.	Revised as recommended.

**DEPARTMENT OF TRANSPORTATION**

District 3

703 B Street

MARYSVILLE, CA 95901-5556

(530) 634-7616

TTY 711

www.dot.ca.gov

*Making Conservation  
a California Way of Life.*

October 9, 2020

GTS# 03-SAC-2020-00745  
24C0081

Ron Bess  
Associate Planner  
Community Development Department  
City of Sacramento  
300 Richard Boulevard  
Sacramento, CA 95811

**Auburn Boulevard Over Arcade Creek Bridge Replacement Project (24C0081) –  
Initial Study/Mitigated Negative Declaration**

Dear Mr. Bess:

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

Located in the City of Sacramento on Auburn Boulevard, between Winding Way and Park Road, the project aims to replace the existing structurally deficient bridge to meet current design guidelines and improve hydraulic capacity. The proposed bridge structure will be 89 feet in length, 97 feet wide, provide two 12-foot through lanes, two 11-foot through lanes, two 11-foot left turn lanes, and shoulders and sidewalks in each direction. During construction, a detour will be established between Winding Way and State Route 244 where extensive signage will be utilized to guide motorists along the detour route. Based on the information received, Caltrans provides the following comments.

Ron Bess  
City of Sacramento  
October 9, 2020  
Page 2

## **Traffic Operations**

Caltrans requests a copy of the DKS traffic analysis prepared for this project to review for potential impacts to the State Route 244 corridor and its connections to both Interstate 80 and State Route 51 during the construction phase. It is recommended that the existing traffic operations system and lighting at the State Route 244 ramps at the Auburn Boulevard intersection be maintained to typical working condition. Existing traffic signs should be maintained/replaced and proposed construction signs affecting the SHS should be reviewed with a traffic management plan with Caltrans. Additionally, any proposed changes or work to existing traffic operations systems should include coordination with Caltrans for review and comments.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

If you have any questions regarding these comments or require additional information, please contact Benjamin Garcia, Intergovernmental Review Coordinator for the City of Sacramento, by phone (530) 741-5173 or via email to Benjamin.Garcia@dot.ca.gov.

Sincerely,

*Alexander Fong*

ALEX FONG  
Acting Branch Chief, Transportation Planning – South  
Planning, Local Assistance, and Sustainability  
Caltrans District 3



**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

**Response to Comments for Comment Letter #8**

<b>Alexander Fong California Department of Transportation, District 3</b>		
<b>Comment Number/ Location</b>	<b>Comment/Recommendation Summary</b>	<b>Response to Comment</b>
#1 Page 2	Caltrans requests a copy of the DKS traffic analysis prepared for this project to review for potential impacts to the State Route 244 corridor and its connections to both Interstate 80 and State Route 51 during the construction phase.	The City shall provide Caltrans a copy of the DKS Traffic Analysis prepared for the proposed project.
#2 Page 2	It is recommended that the existing traffic operations system and lighting at the State Route 244 ramps at the Auburn Boulevard intersection be maintained to typical working condition.	The existing traffic operations system would remain in-place and in working order throughout proposed project implementation and would only experience temporary cycle modifications due to the implementation of the proposed construction detour.
#3 Page 2	Existing traffic signs should be maintained/replaced and proposed construction signs affecting the SHS should be reviewed with a traffic management plan with Caltrans.	Existing traffic signage in the proposed project would be maintained in place when feasible or replaced in coordination with Caltrans during final design of the proposed project. Proposed construction signage would be coordinated with Caltrans and included in the traffic management plan.
#4 Page 2	Any proposed changes or work to existing traffic operations systems should include coordination with Caltrans for review and comments.	The City shall coordinate with Caltrans on any further project design or action decisions made regarding the proposed project.

**From:** Tim Vendlinski <[tvendlinski@sbcglobal.net](mailto:tvendlinski@sbcglobal.net)>  
**Sent:** Monday, October 12, 2020 2:21 PM  
**To:** Ron Bess <[RBess@cityofsacramento.org](mailto:RBess@cityofsacramento.org)>; Zuhair Amawi <[ZAmawi@cityofsacramento.org](mailto:ZAmawi@cityofsacramento.org)>  
**Cc:** Ryan Moore <[RMoore@cityofsacramento.org](mailto:RMoore@cityofsacramento.org)>; Raymond Costantino <[RCostantino@cityofsacramento.org](mailto:RCostantino@cityofsacramento.org)>; Janelle Oishi <[JOishi@cityofsacramento.org](mailto:JOishi@cityofsacramento.org)>; Brianna Moland <[BMoland@cityofsacramento.org](mailto:BMoland@cityofsacramento.org)>; Dylan Wood <[dylan.a.wood@wildlife.ca.gov](mailto:dylan.a.wood@wildlife.ca.gov)>  
**Subject:** Requesting a call with you and the lead person from Dewberry/Drake Haglan re: Auburn Blvd. Replacement Bridge

Dear Messrs. Bess & Amawi:

Please let me know when you would be available for a call at your earliest convenience.

I'd also appreciate you inviting the lead person from Dewberry/Drake Haglan to participate in the call.

Please find below the discussion topics I'd like to cover:

1. Lack of conceptual engineering drawings and description of the bridge structure in the CEQA document.

The City obviously had these drawings available as they were presented during the Zoom call, and it would have been very helpful if these drawings would have been included in the CEQA document.

2. Poor sequencing of public involvement opportunities.

On the Zoom call, the City and their consultants promised intensive outreach efforts only after the project is approved by the City Council in November 2020. That is no way to engage the community and win support for your project.

The City staff have shown great reluctance to make design changes in municipal projects after the City Council has approved a given project.

Over the years, I wrote several requests for engagement and collaboration, but the City was not receptive to these opportunities for input.

Together, we could have created a robust project design and CEQA document that we could all embrace. Instead, we have an insufficient CEQA document for a project whose features are poorly described.

3. Permanent bridge vs. temporary bridge. The CEQA document does not disclose cost information for the different project elements, so the cost of the temporary bridge upstream on private property is not known, and there's no way to compare it to the cost of a permanent pedestrian/equestrian bridge favored by Park stakeholders that would be installed downstream in the East Side Natural Area.

4. The need to address the discharge of contaminated water and trash into the creek.

5. Onsite mitigation vs. the purchase of credits in an off-site mitigation bank.

Thank you,  
Tim

Tim Vendlinski  
(510) 366-4669

**AUBURN BOULEVARD BRIDGE OVER ARCADE CREEK  
BRIDGE REPLACEMENT PROJECT  
RESPONSE TO COMMENTS**

<b>Response to Comments for Comment Letter #9</b>		
<b>Tim Vendlinski Arcade Creek Restoration Project</b>		
<b>Comment Number/ Location</b>	<b>Comment/Recommendation Summary</b>	<b>Response to Comment</b>
#1	Lack of conceptual engineering drawings and description of the bridge structure in the CEQA document. The City obviously had these drawings available as they were presented during the Zoom call, and it would have been very helpful if these drawings would have been included in the CEQA document.	The engineering drawings have not been finalized and therefore are not included in the CEQA document.
#2	Poor sequencing of public involvement opportunities. On the Zoom call, the City and their consultants promised intensive outreach efforts only after the project is approved by the City Council in November 2020. That is no way to engage the community and win support for your project. The City staff have shown great reluctance to make design changes in municipal projects after the City Council has approved a given project. Over the years, I wrote several requests for engagement and collaboration, but the City was not receptive to these opportunities for input. Together, we could have created a robust project design and CEQA document that we could all embrace. Instead, we have an insufficient CEQA document for a project whose features are poorly described.	The City has complied with the requirements of the CEQA guidelines. The City has met with surrounding property owners and interest groups to discuss the project. Additional outreach will continue during final design of the Project.
#3	Permanent bridge vs. temporary bridge. The CEQA document does not disclose cost information for the different project elements, so the cost of the temporary bridge upstream on private property is not known, and there's no way to compare it to the cost of a permanent	The addition of a separate pedestrian/ equestrian bridge downstream of Auburn Boulevard across from Arcade Creek is out of the scope of the proposed bridge replacement project. The purpose of the Project is to replace the existing bridge over Arcade Creek and

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	<p>pedestrian/equestrian bridge favored by Park stakeholders that would be installed downstream in the East Side Natural Area.</p>	<p>provide a new structure that is consistent with current design standards for roadway geometry, accessibility, and structural integrity; to increase hydraulic capacity; and to update the Auburn Boulevard and Winding Way intersection to enhance pedestrian safety and improve the existing intersection operations. A temporary pedestrian detour path would be constructed approximately 100 feet upstream of the existing bridge to provide access over Arcade Creek for the duration of Project construction; however, the temporary pedestrian bridge and associated pathway would be removed upon the completion of Project construction.</p>
#4	<p>The need to address the discharge of contaminated water and trash into the creek.</p>	<p>Water Quality BMPs including Sacramento County's stringent Water Quality measures will be followed. As far as trash on the ground and in the creek, the City acknowledges this is an on-going problem and routinely has the maintenance department clean up these areas.</p>
#5	<p>Onsite mitigation vs. the purchase of credits in an off-site mitigation bank.</p>	<p>The City will work with the permitting agencies to determine the best method of mitigation. Due to the current conditions at the site, long-term monitoring at the mitigation site would be unsafe and there is the potential for vandalism due to the surrounding development. In addition, the project area is not large enough to accommodate on-site mitigation as only the areas that would be impacted were studied. The restoration of Arcade Creek is an entirely separate project. However, the City may consider implementing or funding a project through a local organization that would directly benefit the Arcade Creek</p>

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		<p>corridor or citizens of the City. A restoration plan for the temporarily impacted areas will be prepared during permitted and will include hydroseeding with a native riparian seed mix and planting native riparian trees.</p>
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**Table 1: Responses to Comments Summary**

Comment Letter	Commenter	Affiliation	Date Sent	Response to Comment
1	Gary Gasperi, PE	County of Sacramento	9/8/2020	The City will continue to coordinate with the County through Right of Way management regarding detours affecting nearby county facilities.
2	Robert Armstrong	Regional Sanitation	9/15/2020	Acknowledge that Sacramento Area Sewer District (SASD) has a collector line located adjacent within Auburn Boulevard.
3	Tim Vendlinski	Arcade Creek Restoration Project	10/1/2020	A summary of comments and responses is included in <b>Table 2</b> below.
4	Molly Wright	Sacramento Metropolitan Air Quality Management District	10/4/2020	A summary of comments and responses is included in <b>Table 3</b> below.
5	Haley MacGowan	Sacramento Area Sewer District	10/5/2020	Acknowledge that SASD has reviewed and approved of the findings of the ISMND, and that an encroachment permit would be required for any relocations of SASD facilities.
6	Teri Burns	Sacramento Horsemen's Association	10/5/2020	A summary of comments and responses is included in <b>Table 4</b> below.
7	Dylan Wood	California Department of Fish and Wildlife (CDFW)	10/5/2020	A summary of comments and responses is included in <b>Table 5</b> below.
8	Alexander Fong	California Department of Transportation, District 3	10/9/2020	A summary of comments and responses is included in <b>Table 6</b> below.
9	Tim Vendlinski	Arcade Creek Restoration Project	10/12/2020	A summary of comments and responses is included in <b>Table 7</b> below.

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Within five days following IS/MND approval, the City must file a Notice of Determination (NOD) with the State Clearinghouse and the Sacramento County Clerk-Recorder. A resolution approving the IS/MND and adopting the MMRP and a Notice Of Determination (NOD) will be prepared for the City's use in this process. This resolution will confirm that the City Council has received and reviewed the IS/MND pursuant to the provisions of CEQA.