

Appendix L **Volume II - Response to Public
Comments**

Comment 57: Arthur Fluter (January 1, 2019)

Tom Buford

From: Arthur Fluter [REDACTED]
Sent: Tuesday, January 1, 2019 11:51 AM
To: Tom Buford
Cc: SacRailActionGroup@gmail.com
Subject: Personal Comment for Inclusion in the Draft EIR for the Del Rio Trail

From:
Arthur Fluter

[REDACTED]

Via Email To: tbuford@cityofsacramento.org

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

Re: Comments for inclusion in the Draft EIR for the Del Rio Trail

Mr. Buford:

I am concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.

A The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried.

B The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations.

C The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The walking/biking trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR-provided maintenance. Longer excursion rides mean more visitors to the City, who are spending more. The reputation of the City as a tourist destination is enhanced.

The DEIR is incomplete with no description of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving equipment from Old Town in the north to Meadowview in the south. From Meadowview, excursion trains can run further to Hood.

The DEIR is incomplete is that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, the city must make us whole again with an equivalent rail connection.

The DEIR is incomplete without a description of the CSRM and SSRR mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The DIER is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clearly evident in the DEIR. Correct these biases in the next version of the EIR.

- Include the value of a fully intact WGBL.
- Include the mitigation value of a rails-with-trails solution.
- Include a cost analysis of pulling the rails and facing years of possible legal action.
- Include a comparative economic analysis of benefits to Sacramento business owners and the tourists who support them using the Rail-With-Trails solution.
- Identify how many runners and walkers will use the destroyed WGBL compared to the number of new tourists who will come to experience a world class on-the-river train experience.

Sincerely,

Arthur Fluter
cc: SacRailActionGroup@Gmail.com

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Art Fluter



Response 57A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will

only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 57B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 57C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

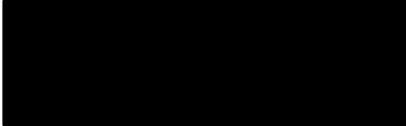
Response 57D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Response 58: John K. Moore (January 1, 2019)

Comments on the Del Rio Trail Project DEIR

John K. Moore



Unlike most other persons commenting on the DEIR, I have walked the Trail. A friend and I recently walked from the South Land Park Drive crossing near the north end of the trail south to Pocket Road. Walking the Trail in its present condition is difficult in quite a few places.

A

More detailed information on trail cross-sections should be included

The DEIR should include data on the proportions of the trail where each combination of bike path and walking path (each trail cross-section) will be constructed, both for each major segment of the trail and the entire trail.

Aerial photography of the trail, annotated with proposed trail cross-sections and labeled "2290 – Overall Exhibit NEW SECTION REVIEW" was prepared no later than June 2018. I suspect that the Proposed Project does not differ much from the project depicted by the 2290 Exhibit. However, the description of the Proposed Project is so lacking in detail that how much the Proposed Project differs from the 2290 Exhibit cannot be determined. I would expect that aerial photograph maps and descriptions of the Proposed Project in the DEIR would together include at least as much detail of the trail cross-sections as the 2290 Exhibit does. The DEIR presents much less detail. The details of the trail cross-sections are important for determining whether the all segments of the proposed trail will be satisfactory for all of the proposed uses. The deficient descriptions in the DEIR should be corrected in the FEIR.

B

Is future train operation a reasonably foreseeable consequence of the Project?

The Walnut Grove branch has been deemed eligible for the National Register of Historic Places. The Proposed Project would preserve 98.2% of the existing tracks and rehabilitate them. Rehabilitation for what purposes? The tracks themselves have very little historic value. Eligibility for the National Register does not require that the tracks be rehabilitated. The only conceivable purpose of rehabilitation is to make future train operation on the rehabilitated tracks possible - after the deficiencies resulting from more than 40 years of deferred maintenance have been remedied.

The Railroad Museum Foundation insists that the existing tracks be preserved; the Foundation plainly states that its ultimate goal is operating excursion trains on the Walnut Grove branch.

Undoubtedly, the Foundation would prefer to board excursion passengers at the Railroad Museum and transport them through the Del Rio Trail area. Operation of trains carrying passengers only on the segments north and south of the Del Rio Trail, but not on the tracks paralleling the Del Rio Trail, has been proposed. Carrying passengers south of the Del Rio Trail would require moving equipment on the tracks in the Del Rio Trail segment. Train operations, whether only moving equipment or also transporting passengers, would have drastic environmental impacts on the proposed use of the Del Rio Trail – the proposed walking trail on the existing tracks would have to be abandoned - and on residents in the vicinity of the Trail.

Is future operation of excursion trains a reasonably foreseeable consequence of the retention and rehabilitation of the existing tracks, although there are no present plans to begin operation? The DEIR ignores this question. The Foundation has clearly asserted that future operation is a reasonably foreseeable consequence and that they will make every effort to realize it. The CEQA Portal paper “What Is a Project?” published by the Association of Environmental Professionals states:

“When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.”

If a future project for operation of excursion trains were proposed, the rehabilitation of the existing tracks during construction of the Del Rio Trail would be an essential initial phase of operation of excursion trains, the subsequent project.

The discussion of “Piecemealing or Segmenting” in the CEQA Portal paper also states:

“Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact.”

The environmental effects of future train operation on the Proposed Project are so obvious and so drastic that significant information about these effects now exists and should be presented and analyzed in the FEIR.

One of the important environmental impacts of train operations that should be analyzed: There are segments of the trail right-of-way that may not be wide enough that trains, bicyclists, and walkers can safely use these segments simultaneously. Scoping comments pointed out the existence of these segments. The environmental impacts of the physical safety measures and operating rules required to ensure safe simultaneous use of these segments should be analyzed in the FEIR.

C

The DEIR asserts that the “No Walking Path” alternative is not ADA-compliant

According to Table 24, the “No Walking Path” alternative does not meet the third project objective, “Provide an ... ADA-compliant, active transportation connection ... for pedestrians and bicyclists of all ages and abilities ...”, but the Proposed Project does meet this objective. The obvious inference from these conclusions is that the walking path between existing rails would be ADA-compliant and that the bicycle trail, used by both pedestrians and bicyclists (which is surely not optimal use), would not be. The reasoning supporting this conclusion could not be located in the text. The references cited by the DEIR do not appear to include direct references to the standards for ADA compliance. The walking path between existing rails does not appear to satisfy the ABA section 17 standards promulgated by the United States Access Board. These deficiencies in reasoning supporting the conclusions about the third project objective should be corrected in the FEIR.

Walking paths between existing tracks are excessively narrow

The track gauge of standard gauge railroads is 4'8-1/2". Because pedestrians will avoid walking on the outer edges of the path next to the rails, the effective width of the path would be approximately 4'2", scarcely wide enough for two pedestrians walking side-by-side, and scarcely wide enough for passing pedestrians walking in the opposite direction. Pausing with one's inner foot on the trail and outer foot outside the rail to give other walkers more space would at least be awkward and might even be somewhat hazardous.

Are there any examples of similar walking paths between existing tracks that have been in use for some time and have performed satisfactorily?

If the tracks were removed, a walking path could occupy the entire width of the flat portion of the roadbed and would be much more satisfactory.

Response 58A:

The project description has been revised to include extensive detail regarding the proposed design. The revised project description can be found in Section 1.0 of the EIR. Additionally, a detailed project features exhibit is now included in Appendix C of the EIR.

Response 58B:

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, or any future planned rail projects, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan; therefore, environmental impacts due to potential train operations is not analyzed within the EIR.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 58C:

Based on public comment, and in an effort to further minimize environmental impacts, the proposed Build Alternative in the EIR has been revised to remove the separate walking trail and its use of decomposed granite between existing rails. Removal of the rail would continue to be necessary in select locations for safety purposes, but these changes do not constitute a significant visual impact under CEQA.

Comment 59: Stanford Davis (December 31, 2018)

December 31, 2018

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

SUBJECT: DEL RIO TRAIL EIR

Dear Mr. Buford:

I am concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.

A

The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to all the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried under this proposed plan.

B

The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory alternate solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations. The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The SSRR operating franchise will be preserved and be able to continue south. Future city maintenance requirements will be reduced by the required SSRR maintenance. Longer excursion rides will mean more visitors to the City, who will spend more. The reputation of the City and Old Town as a tourist destination will be enhanced.

C

The DEIR is incomplete with no description of the potential operation of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving equipment from old Town in the north to Meadowview in the south. From Meadowview, excursion trains can run further to Hood. Current missing rail can easily be replaced to complete the connection.

The DEIR is incomplete in that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, filled in or paved over, the City must make us whole again with an equivalent rail connection.

The DEIR is incomplete without a description of the CSR/M and SSRR mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The DEIR is incomplete as it does not describe the potential financial losses that will accrue to the CSR/M/SSRR. The CSR/M/SSRR is a world-class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to the reputation of the CSR/M/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clear in the DEIR. These biases must be corrected in the next version of the EIR. Include the value of a fully intact WGBL. Include the mitigation value of a rails-with-trails solution.

If the City is truly interested in maintaining historical transportation and enhancing the City as a tourist attraction, this rail line must be saved and restored to operation. It is every bit as important as a trail route and will impact adjoining properties much less than trail users.

With Sacramento's place as the starting point of the most historic rail project in the history of the United States, for the City to ignore the historic significance of the WGBL rather than to use its resources for the preservation and future connection of the rails of the SSRR represents a disregard for the past and future of its citizens.

Yours truly,

Stanford E. Davis, P.E.

Response 59A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 59B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 59C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 59D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 60: Charles Boley (January 1, 2019)

Charles R. "Dick" Boley



Mr. Tom Buford
Manager, Environmental Planning Services
City of Sacramento
300 Richards Blvd, 3rd Floor
Sacramento, CA 956811

Mr. Buford

I am a docent at the California State Railroad Museum (CSRM) with more than six years of service and more than 3700 hours of donated time to this organization. I am concerned that the proposed Del Rio Trail (DRT) is completely ignoring the mission of the museum and its rail line.

A

The proposed DRT takes away the ability for the museum to utilize the railroad right of way (ROW) which extends from the museum southward to the city of Hood, CA which is approximately a distance of 14 miles. While only a portion of the ROW is currently used, should this DRT go forward, it could permanently prevent the museum from using this valuable asset.

B

As a point of reference, in an attempt to establish the value Sacramento Southern Rail Road (SSRR) ROW, I would like to reference the White Pass to Yukon Railroad (operates approximately four months per year), which is another tourist and legacy railroad. It runs between Skagway, Alaska, to the White Pass Summit (20 miles) with an extension to Whitehorse, Yukon Territory. This privately owned railroad was sold on July 31, 2018, to Survey Point Holdings (majority owners) and Carnival/Holland America (minority owners) for the sum of \$290,000,000 U.S. Dollars (verifiable by Google). It is my opinion that the monetary value of the SSRR ROW, which belongs to the Museum and the City of Sacramento, is grossly underestimated. If the DRT goes forward it will forever destroy the track linkage from Sacramento to Hood and would be an incalculable squandering of public tangible assets.

I believe the museum and the SSRR should be encouraged to further utilize this ROW as these two organizations are the number one tourist attractions in Sacramento. With that said, the hottest tickets in town are the Polar Express trains which has more than 25,000 riders per year between Thanksgiving and the Christmas Holidays and the seasonal train rides are usually filled to capacity with paid guests. The public demand for the museum and surrounding railroad attractions continues to grow and in my opinion the City of Sacramento should do everything it can to support this valuable community asset.

Charles R. Boley
Cc: SacRailActionGroup@Gmail.com

Response 60:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

Response 60B:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 61: Robert Lee (December 31, 2018)

Tom Buford

From: Robert Lee [REDACTED]
Sent: Monday, December 31, 2018 9:51 AM
To: Tom Buford
Cc: SacRailActionGroup@gmail.com
Subject: Del Rio Trail

Robert Lee

[REDACTED]

Via Email To:

tbuford@cityofsacramento.org

Mr. Tom Buford

Manager, Environmental Planning Services
City of Sacramento
Community Development Department
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811

Mr. Buford:

I am concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.

I have always believed proposals for change should address all possible approaches to a solution. These documents clearly do not. The historical significance of the Sacramento Southern Railroad (SSRR) and its part in the world class CSR operations are completely ignored.

A

The DRT is a classic example of a rails-with-trails solution, yet it is not even mentioned as an option. California has hundreds of miles of successful RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations. The RWT solution will provide a win for everyone. The trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR provided maintenance. Longer excursion rides mean more visitors to the City, who are spending more. The reputation of the City as a tourist destination is enhanced. This could be a win for everybody.

B

The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. This will result in a loss of revenue for the state of California and the city of Sacramento by stifling the vibrant Old Sacramento district.

C

The DEIR is incomplete with no description of the SSRR and the adverse effects of pulling the rails. With title to the rails in the Meadowview area and Old Sac we must have access between those ends via the existing rails. With this connection, excursion trains can run further to Hood.

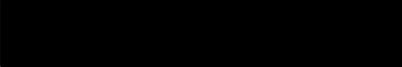
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Making decisions in life without considering all options is a clear path to failure. Please expand the DEIR to include all options and open a discussion of them so that the best solution for Sacramento and California can be reached.

Sincerely,
Robert Lee

--
Bob Lee
Retired!!!
Docent Class 51



Response 61A:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

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River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 61D:

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Comment 62: Adam Aleman (December 29, 2018)

Tom Buford

From: Adam [REDACTED]
Sent: Saturday, December 29, 2018 10:22 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: There are several bad items in the DEIR.

Adam Aleman

[REDACTED]

Mr. Tom Buford
Manager, Environmental Planning Services
City of Sacramento
Community Development Department
[300 Richards Blvd, 3rd Floor](#)
[Sacramento, CA 95811](#)

Mr. Buford:

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The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried.

B

The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations. The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR provided maintenance. Longer excursion rides mean more visitors to the City, who are spending more. The reputation of the City as a tourist destination is enhanced.

C

The DEIR is incomplete with no description of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving equipment from Old Town in the north to Meadowview in the south. From Meadowview, excursion trains can run further to Hood.

The DEIR is incomplete is that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, the city must make us whole again with an equivalent rail connection.

The DEIR is incomplete without a description of the CSRM and SSRR mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The DEIR is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clear in the DEIR. Correct these biases in the next version of the EIR. Include the value of a fully intact WGBL. Include the mitigation value of a rails-with-trails solution.

Clearly the SSRR Needs to be supported by the City, County and the State of California!

Sincerely,
Adam Aleman

cc: SacRailActionGroup@gmail.com

Response 62A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 62B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 62C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 62D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 63: Jeffrey Whitehorn (December 29, 2018)

Tom Buford

From: Comcast [REDACTED]
Sent: Saturday, December 29, 2018 7:14 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Del Rio Trail

Jeffrey F. Whitehorn



Mr. Tom Buford
Manager, Environmental Planning Services
City of Sacramento
Community Development Department
[300 Richards Blvd, 3rd Floor](#)
[Sacramento, CA 95811](#)

Dear Mr. Buford:

By now, I'm sure you have received other emails expressing concerns about the DEIR for the Del Rio Trail project.

A

Let me be brief, as I'm sure you are a busy person. I was shocked to learn that this project, which no doubt has its merits, also shows complete disregard for, and in fact ignores any provision to accommodate the rail operations in connection with the California State Railroad Museum's associated excursion route, the Sacramento Southern Railroad.

I'm sure the Del Rio Trail project will bring enjoyment to many of Sacramento's residents, and it's merits should be considered carefully. Do not the interests of fans of the museum 's railroad deserve the same?

B

How can their interests be callously thrust aside without due consideration. The DEIR, as it stands now, will disrupt the operations of the Walnut Grove Branch Line; it's fair to say that it will even destroy it, and this is an important artifact of California history. The shame of this all is that the proposal does not even consider a possible compromise, that is, Rails WITH Trails. Think how enjoyable it would be for those using the trails to see vintage railroad equipment operating nearby!

I trust that you are a good and faithful public servant, and will give fair consideration to both sides of this question. That may require some additional effort of you, as I understand the DEIR does not even consider the excursion railroad's interests. That just seems wrong and one-sided.

Sincerely,

Jeffrey F. Whitehorn

cc: SacRailActionGroup@Gmail.com

Response 63A:

Thank you for your comment. The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH:

20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 63B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Comment 64: Jim and Margie Gee (December 28, 2018)

Tom Buford

From: Jim and Margie Gee <[REDACTED]>
Sent: Friday, December 28, 2018 1:55 PM
To: Tom Buford
Cc: [REDACTED]
Subject: Rio Trail draft eir.doc

[REDACTED] LC

Tom Buford, Manager
City Sacramento, Community Dev. Dept.
300 Richards Blvd.
Sacramento, CA 95811

Subject: Rio Trail Draft EIR Comments

Tom Buford

Steve Williams and I own the building adjacent to the proposed trail between Sutterville Road and South Land Park Drive and we are very concerned with the potential use of our parking lot.

We are both bicyclist and totally support the proposed trail. However, we are also very familiar with the fact that cyclists park their cars in any parking adjacent to trails. Our parking lot is fully utilized by our building occupants and any use by cyclists would be a major problem.

Sutterville Road and South Land Park Drive have the potential to be major access routes for trail users. You have proposed two other parking lots. A parking lot is also needed in this area.

Also to stop cyclists from using our lot your project needs to include a fence along our common property line.

Very truly yours

Response 64:

Thank you for your comments. Use of your private parking lot for trail users is not an intended outcome of this project; however, the City understands that this could be an unintended result that could impact your business use. At this time, there is no plan to construct a dedicated parking lot for the trail near the trail crossing of Sutterville Road; however, the City will look into potential options for parking for trail users to alleviate potential illegal use of your property. Furthermore, the City will consider additional measures during final design such as fencing, signage to restrict parking on your property, or other measures to minimize potential future illegal parking activities.

Comment 65: Roger Simpson (December 30, 2018)

Roger Simpson



Mr. Tom Buford

Manager, Environmental Planning Services
City of Sacramento
Community Development Department
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811

Mr. Buford:

I am concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.

A

The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried.

B

The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations. The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR provided maintenance. Longer excursion rides mean more visitors to the City, who are spending more. The reputation of the City as a tourist destination is enhanced.

C

The DEIR is incomplete with no description of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving

equipment from Old Town in the north to Meadowview in the south. From Meadowview, excursion trains can run further to Hood.

The DEIR is incomplete in that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, the city must make us whole again with an equivalent rail connection.

The DEIR is incomplete without a description of the CSRM and SSRR mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The DEIR is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clear in the DEIR. Correct these biases in the next version of the EIR. Include the value of a fully intact WGBL. Include the mitigation value of a rails-with-trails solution.

Sincerely,
Roger Simpson

cc: SacRailActionGroup@Gmail.com

Response 65A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 65B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 65C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 65D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 66: Vito Sgromo (December 27, 2018)

Tom Buford

From: Vito Sgromo [REDACTED]
Sent: Thursday, December 27, 2018 7:25 PM
To: Tom Buford
Cc: Jesse Gothan
Subject: Del Rio Trail

Mr. Buford:

I am a recognized expert on California history, with over 35 years of extensive experience in historic preservation both locally and statewide. My professional work has included interpretive, cultural, artistic, curatorial, and preservation related positions at CA State Parks and the California State Office of Historic Preservation as well as managing state and national historical landmarks in the Sacramento region, including the historic State Capitol building.

As someone who has actually managed historical buildings, I feel compelled to weigh in on the cultural impacts of the Del Rio Trail project.

I have reviewed the City of Sacramento's Draft EIR for the Del Rio Trail and strongly support the project as drafted. I have concluded that there are no further design modifications needed to comply with NEPA and CEQA requirements relative to cultural resources. It appears that the City has made significant and sufficient efforts to preserve the historical integrity of the old Sacramento Southern rail corridor, including sections where the trail is embedded on top of the rail tracks.

I strongly support the Del Rio Trail project and see no need to alter the City's trail design to satisfy the whims of a few vocal rail enthusiasts.

Historical preservation is my profession and my passion. I would not support this project unless I felt it respected history and complied with the law.

Please feel free to contact me if you need further information.

Sincerely,
Vito Sgromo

[REDACTED]

Response 66:

Thank you for your comment and support of the Del Rio Trail project.

Comment 67: Roger and Iris Baccigaluppi (December 20, 2018)

Roger and Iris Baccigaluppi



December 18, 2018

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

Dear Mr. Burford:

A I write in support of the proposed Del Rio Bike and Pedestrian Trail. I am however, opposed to the removal of any of the historic Walnut Branch Line rails. The removal of even a tiny percentage in effect, renders the future possibility of rail use virtually impossible. Furthermore, the removal of these historic rails is not at all necessary to build the highly desired bike and pedestrian trail. It can all be done without disturbing the rails in any way, and I believe at a substantially reduced cost.

C We find it difficult to understand why it has been suggested that a separate walking trail be constructed between the existing rails. We have examples within this county of multiple use trails, including the American River Bike Trail, where bikers and pedestrians share the same path. There are other examples throughout the country, and much of the rest of the world, where "abandoned" rails line right of ways are used for multi-use trails without disturbing the

rail lines. In fact, we have one example, right in the city, near Miller Park, where a bike and walking path exists right next to an operating rail line.

The rail right of way is not only historic, and important to preserve from that standpoint, but also potentially as a working rail line in the future, whether for train operations for tourists (bringing tourist dollars to the city) or even possibly as a working transportation corridor to downtown Sacramento. We have seen many examples of rail lines and right of ways destroyed, and then reincarnated at huge cost later on. Just look at the old Pacific Electric in the Los Angeles area, and the costs that were incurred to purchase all new right of way for their new commuter rail system.

It would be near pure insanity to destroy these historic and potentially useful in the future rails, when it is absolutely not necessary to accomplish the building of a useful bicycle and pedestrian train.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger J. Baccigaluppi". The signature is fluid and cursive, with the first name "Roger" being particularly prominent.

Roger J. Baccigaluppi

Response 67A:

Thank you for your comment. The project will not preclude an excursion train from being proposed along this alignment in the future. The project will preserve the majority of the existing track, including its metal rails, wood ties, and gravel ballast. Track removal is only proposed where necessary for safety reasons.

Response 67B:

Track removal is proposed at select locations for safety purposes for the following conditions:

Where steel rails remain and are buried or embedded in asphalt concrete, there is a safety concern because asphalt is a flexible pavement as compared to steel and the differential strength and expansion/contraction characteristics of these two materials cause the asphalt over and around the embedded/buried steel rails to separate, settle, and prematurely deteriorate. The deterioration of the asphalt around embedded/buried rails at the trail crossing can result in gaps/cracks that can catch bike tires and loose debris that can cause slippage or unexpected tire rupture.

Where steel rails remain and are embedded in concrete (with the surface of the rail flush with the pavement) and the trail crosses the rail in a skewed alignment, there is a safety concern because the length along which a bicyclist would have to involuntarily ride their tire over the steel surface that provides no traction is significantly greater in a skewed condition as compared to a perpendicular condition. During this time, the tractionless surface has greater potential to cause instability with the bicycle, which increases the potential for accident or collision.

At road crossings, where steel rails intersect proposed access improvements such as curb/gutter/sidewalk and the required ADA-compliant ramps, the existing rail, which is buried beneath the asphalt pavement, will be exposed within the ADA ramp and curb/gutter section due to the differential elevation of the rails and the gutter grades. If left intact, the rail would create an unsafe obstruction to trail users, drivers, and storm runoff flow.

The existing railroad embankment south of the Del Rio Road/ 27th Avenue/Normandy Lane intersection is significantly higher than the adjacent roadways. At the highest elevation differential, there is an existing path of travel across the tracks in an east-west direction for residents and for school children traveling to Sutterville Elementary that is unsafe and non-ADA compliant due to its steep grades. Lowering the embankment, which requires removal and relocation of existing track, would establish safe, ADA compliance to the trail while also improving the safety of the existing east-west path of travel.

This information has been included within the updated Project Description in Section 1.0 of the EIR.

Response 67C:

Based on public comment, and in an effort to further minimize environmental impacts, the proposed Build Alternative in the EIR has been revised to remove the separate walking trail and its use of decomposed granite between existing rails. Removal of the rail would continue to be necessary in select locations for safety purposes.

Comment 68: Lois VanBeers (December 6, 2018)

**DRAFT ENVIRONMENTAL
IMPACT REPORT
COMMENT CARD**
Public Information Meeting
Thursday, December 6, 2018

**THE
DEL RIO TRAIL
PROJECT**

City of
SACRAMENTO
Department of Public Works

The period for public review and comment is
November 5, 2018 through January 5, 2019

Name: Lois VanBeers

Address (Optional):

Telephone (Optional):

Organization (Optional):

Comment: I live on Del Rio Rd in a house that
backs up to the trail. I am all for this project.
A bike + walking trail separate from traffic
will be a real asset to the neighborhood + the City.
It will also allow safer routes to school for
the many children in the area who go to Sutterville,
Sam Brennan, + Alice Burney schools.
All speed ahead!

Response 68:

Thank you for your comment and your support of the Del Rio Trail project.

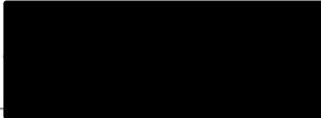
Comment 69: Laurie Scott (December 6, 2018)

**DRAFT ENVIRONMENTAL
IMPACT REPORT
COMMENT CARD**
Public Information Meeting
Thursday, December 6, 2018

**THE
DEL RIO TRAIL
PROJECT**

City of
SACRAMENTO
Department of Public Works

The period for public review and comment is
November 5, 2018 through January 3, 2019.

Name: Laurie Scott Address (Optional): 

Telephone (Optional): 

Organization (Optional): 

A

Comment: I'm very concerned about the potential damage to my home & garage. As it is I have cracks in my home from the train that now passes on Sat/Sun. I can only imagine the damage from bulldozers and heavy equipment in my backyard. Another concern is

B

the fall off of the edges of the trail on my property. Will I have increased flooding, rock & mud runoff and how close to my fence the edge will be. Will there be a taller barrier or privacy? I hope there will be better maintenance than in the past.

Response 69A:

Thank you for your comments. The proposed project would not require the acquisition of private property and is not anticipated to incur damages to private property as a result of construction.

Response 69B:

A Drainage Report will be prepared for the project which will determine the drainage design associated with the proposed project. The drainage design will take historic flows into account, as the design will utilize topography data and flowlines to ensure all stormwater is properly drained to the appropriate facilities and not to private property. The site's hydrology will be extensively reviewed prior to construction of the project. The City is aware of the potential loss of homeowner privacy as a result of the project. Measures such as those suggested and others to minimize loss of privacy will be incorporated into the project during final design. While vegetation management will be implemented in order to improve safety and security along the trail, select corridors may opt to maintain or improve existing vegetation to ensure that homeowner privacy is maintained.

Comment 70: Marcia Waechtler (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD
Public Information Meeting
Thursday, December 6, 2018

THE DEL RIO TRAIL PROJECT
The period for public review and comment is
November 5, 2018 through January 3, 2019.

City of SACRAMENTO
Department of Public Works

Name: Marcia Waechtler Address (Optional): [REDACTED]
Telephone (Optional): [REDACTED]
Organization (Optional): *Wish the plan could allow our use of "road". Someone should talk to us
Comment: 1) Truly do NOT want the trail project. Spend the \$ on the American Bike Trail
2) I've lived at 4401 Moss since Feb. 1975
3) We've been using the dirt "access road" to get into our backyard since 1975. It is the only way we can get our fishing boat into our backyard. Driveway very narrow! can't back up boat.
4) If the project is accepted we will be forced to move or give up fishing in our boat.
5) The "wildness" of the area will be turned into cement and many animals will lose their "homes".
6) Saddened by the project NOT trying to maintain our access.

Handwritten notes on left margin:
A: dirt fishing
B: she should approve other trails
C: m trails

Response 70A:

Thank you for your comment. The project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan. Restoring the American River Trail is not a component of the project at this time.

Response 70B:

Per Caltrans Highway Design Manual Bikeway Design Criteria 1003.1, except for emergency services, motor vehicles are prohibited on a Class I multi-use trail.

Response 70C:

See Section 2.1 of the EIR. The City is committed to preserving biological resources within the corridor as much as feasible. The proposed Project is anticipated to require select removal of trees throughout the Project corridor; however, the proposed Project would involve aesthetic treatments such as landscaping enhancements, educational signage, and planting trees and vegetation in select locations along the trail corridor. The proposed Project would require the removal of approximately 161 trees within City right of way which meet the City's requirements as a protected City Tree. The proposed Project would also require the removal of approximately 59 trees within State Parks right of way. No trees on private property are anticipated to be removed. While the elimination of large existing trees would temporarily impact the existing visual quality of the

corridor, new trees and vegetation would be planted and allowed to grow (the City has been working with the Sacramento Tree Foundation in this regard); therefore, this impact would be temporary and ultimately result in a similar visual quality. The proposed Project would also be designed to avoid oak trees to the greatest extent feasible. The City would comply with City Code 12.56.040 and establish a replacement plan prior to removal of the protected trees pursuant to Sacramento City Ordinance 2016-0026, Chapter 12.56 City and Private Protected Trees. With the implementation of measure AES-1, the proposed Project would have a less than significant impact on protected trees.

Section 2.1 of the EIR and measure AES-1 have been updated to include information regarding planting replacement trees: “The City shall replace all removed trees removed by project construction with a minimum of 700 trees. If additional trees can be incorporated into the project design and planting plan above 700 trees, the City shall plant where feasible. The exact number of trees and locations shall be determined during final design.”

Comment 72: Juana Lopez Rodriguez (December 6, 2018)

**DRAFT ENVIRONMENTAL
IMPACT REPORT
COMMENT CARD**
Public Information Meeting
Thursday, December 6, 2018

**THE
DEL RIO TRAIL
PROJECT**

City of
SACRAMENTO
Department of Public Works

The period for public review and comment is
November 5, 2018 through January 3, 2019.

Name: Juana Lopez Rodriguez Address (Optional): 

Telephone (Optional): 555.555.5

Organization (Optional): _____

Comment: As a homeowner, I disagree with having all this activity in my backyard. It brings other issues that will be huge concerns for the neighborhood in the future. However if this will occur I recommend adding a cyclone fence by the city for the 26 backyards affected by this project. to allow at least some privacy.

Questions, send me a letter. Thank you.
Juana & Gabriel

Response 72:

Thank you for your comment. The City has incorporated a number of measures into the project to ensure the corridor remains safe and secure. During scoping of the project, the City partnered with the Police Department and the Park Rangers to review the project, discuss the concerns noted by local residents, and obtain feedback on elements that are critical to promoting safety along the corridor. The primary methods to ensure the trail remains safe include vegetation management and routine patrols by City Park Rangers; however, some additional fencing will be constructed to limit access along the corridor.

Comment 73: Charles Hughes (January 1, 2019)

1 January 2019

Mr. Tom Buford, Manager of Environmental Planning Services
City of Sacramento Community Development Department
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Submitted Via E-Mail to: tbuford@cityofsacramento.org

Subject: Comments on the Del Rio Trail Project Draft EIR

Dear Mr. Buford,

These comments are submitted on the Del Rio Trail Project Draft Environmental Impact Report (EIR). They are made with the purpose of an improved Final EIR.

Most of the comments are on the biological section. I have 16 years of professional experience with biological resources including special-status species, natural communities, trees/arboriculture, and wetlands/waters. I am familiar with the California Environmental Quality Act, Federal Clean Water Act §401/404, Federal and State Endangered Species Acts, and State Streambed Alteration Agreements. I have a bachelor's degree in environmental horticulture and urban forestry from UC Davis, and a master's degree in plant biology from Michigan State University. I am familiar with the biological special-status resources in the region and the biological study area (BSA) of the EIR. I am interested in the project because I live in a neighborhood affected by it and my home is adjacent to the BSA.

A

Comment 1: On page 47-48 the term "special-status species" is explicitly defined "for the purposes of this Draft EIR." The definition on page 47-48 is clear and comprehensive. The DEIR defines "special-status species" twice more on page 51, and a fourth time on page 101. None of the four definitions is identical. The first definition should be kept and the last three definitions should be deleted.

B

Comment 2: The May 2017 field surveys are described twice on page 51. In one instance the surveys are described as including "Federal and State sensitive species", and in the other as including "Federal and State protected species". The field surveys probably included all "special-status species" as defined in the EIR (see Comment 1). If so, the instances of "Federal and State sensitive species" and "Federal and State protected species" on page 51 should be replaced with "special-status species".

C

Comment 3: The caption for Table 7 is "Listed and Proposed Species with the Potential to Occur or Known to Occur in the Project Area." Not all species in the table are listed or proposed for listing under the federal or state endangered species acts. Similar to Comment 2, "special-status species" is probably meant. The caption for Table 7 should be changed to "Special-Status Species with the Potential to Occur or Known to Occur in the Project Area."

D

Comment 4: On pages 51 and 95 the DEIR lists “drainage” and “depressional wetland” as dominant vegetative communities in the BSA. According to Figure 13, the study area is over 248 acres, drainage comprises 0.57 acre, and depressional wetland comprises 0.05 acre. Vegetative communities that comprise much less than 1% of the BSA should not be characterized as dominant. Indeed, the DEIR identifies valley foothill riparian (0.97 acre) as a minor habitat type even though it has more acreage. Drainage and depressional wetland should be recharacterized as minor vegetative communities in the BSA.

E

Comment 5: The DEIR identifies 57.3 acres of “ruderal/disturbed grassland” in the BSA. The area is depicted on Figure 13. Substantial tree canopy cover is evident in many in the ruderal/disturbed grassland areas. On some sheets (1 and 5) of Figure 13 tree canopy appears to exceed 50% cover. Only south of Z’Berg Park does tree canopy in ruderal/disturbed grassland appear to be consistently below 25%. The “ruderal/disturbed grassland” contains substantial amounts of trees. Many of the trees are native valley oaks or interior live oaks. Substantial numbers of horticultural or invasive trees also occur, including cork oaks, eucalyptus, fruit and nut trees, and privets. The area mapped as “ruderal/disturbed grassland” should be renamed “ruderal/disturbed” and a more thorough description of the conditions described in the text. I recommend the following paragraph:

The ruderal/disturbed vegetation community contains substantial disturbance, but less than the urban community. Ruderal/disturbed has somewhat more natural conditions than the urban community as it does not contain maintained landscaping except for tree pruning in some areas. Nearly the entire length of the ruderal/disturbed community contains existing railroad track and grade, and much of it contains a gravel road. There is also a small stormwater detention basin, levee slope, and other areas of disturbance. The ruderal/disturbed community contains almost no native vegetation in the herbaceous and shrub layers. The tree canopy, where present, is a mix of native and nonnative trees. Some of the trees are native oaks or other trees regulated by City of Sacramento ordinance. Impacts and mitigation for Project tree removal are described below.

F

Comment 6: On page 17, the environmental setting description in the aesthetics and visual resources section states that “oak woodlands” are present. “Oak woodlands” should be replaced with “patches of both native and nonnative trees.” The biological section of the DEIR does not determine that oak woodlands are present. Similarly, the caption of Figure 7 should be revised so that it does not reference “oak woodland.”

G

Comment 7: In Table 7 on page 75 the rationale for the potential for occurrence of song sparrow states that “mixed Valley Oak woodland” is present in the BSA. The term here should be revised to “mixed trees including native and nonnative oaks.”

H

Comment 8: With reference to Comments 5, 6 and 7, an alternative approach would be to revise Figure 13 to map small areas of oak woodland. There are patches of native oaks, mostly valley

oaks, in the BSA. The DEIR notes the presence of native oaks, that some will be removed, and includes mitigation for their removal. Not mapping oak woodland under the circumstances of the BSA (a disturbed urban corridor with substantial amounts of nonnative and/or invasive trees) is not a deficiency of the DEIR, as the impact is identified and the mitigation would be the same for either approach. The primary reference used by the California Department of Fish and Wildlife to define vegetative communities explains the concept of a “minimum mapping unit” and notes that there will essentially always be small patches of vegetation that might possibly be identified as a separate type if smaller polygons were drawn (Sawyer et al. 2009).

I

Comment 9: On Page 80 in Table 7 the DEIR correctly concludes there is no potential for conservancy fairy shrimp based on lack of habitat. However, the DEIR reports that the nearest CNDDDB occurrence is over 70 miles away. The nearest CNDDDB record (Occurrence #19) is actually a little over 9 miles southwest of the southern end of the BSA.

J

Comment 10: On Page 74 in Table 7 the DEIR correctly concludes there is no potential for burrowing owl, but the rationale justifying the conclusion is poor. The DEIR general habitat description includes “grasslands and disturbed open habitats”, but the rationale determines there is no habitat because “grasslands that are within the BSA are highly disturbed and mowed consistently.”

Burrowing owls are known to utilize highly disturbed and human-altered land (YHC 2018). Further, tall grass is known to discourage burrowing owl occupation because it increases cover for predators. *Not mowing* grass and letting it grow tall is a method to avoid occupation by burrowing owl (SJCOG 2000). The rationale does mention the proximity of residential urban areas. This is a better rationale. While burrowing owls can persist in some kinds of urban development, residential areas pose a particular problem because of the density of both pet and feral cats, which are a significant predator of burrowing owl (CBD 2003). The entire BSA is near residential areas. Presumably, during fieldwork for the Project, no ground squirrels were seen, and no suitable burrows for owls. If so, the rationale should note this. Burrowing owls are frequently associated with ground squirrel populations (YHC 2018). I have never seen any ground squirrels, or burrowing owls, in the areas of the BSA I frequent. Finally, even if burrowing owls were to colonize a part of the BSA in the future, implementation of BIO-3 would result in their avoidance.

K

Comment 11: On Page 75 in Table 7 the rationale for potential for occurrence for least Bell’s vireo should correct the mistaken reference to burrowing owl.

L

Comment 12: On Page 77 in Table 7, the DEIR concludes there is no potential for white-tailed kite nesting or foraging in the BSA. It is unclear why the DEIR concludes there is a “low to moderate potential” for Swainson’s hawk to occur, but no potential for white-tailed kite. White-tailed kites utilize very similar habitats. The more open grassy areas near the south end of the BSA are white-tailed kite foraging habitat. The DEIR should also conclude that there is a low potential for white-tailed kite. Implementation of BIO-3 would result in their avoidance.

M

Comment 13: On Page 87 in Table 7, the DEIR correctly concludes there is no potential for northern California black walnut to occur, but the rationale justifying the conclusion is poor. The rationale states “the BSA does not contain suitable riparian habitat along stream or river slopes.” According to Figure 13, there is valley foothill riparian along the waterside slope of the Sacramento River levee in the BSA. There clearly is a small amount of riparian habitat in the BSA.

The rationale should instead point out the unusual situation with this particular species. As a result of its widespread agricultural use as a rootstock for English walnut, it occurs commonly throughout much of California. Only 3 sites are considered native northern California black walnut occurrences (Jepson 2018). It is these 3 particular sites that are special-status. One of these sites was along the Sacramento River. As the DEIR points out, that particular grove was lost according to CNDDDB. But scattered trees remain along the river. The important point is that such trees are not considered the special-status resource.

In addition, recent genetic research indicates that scattered northern California black walnut trees are mostly not hybridized, and therefore the species is relatively common, and therefore “results suggest that individual *J. hindsii* trees should not have conservation status” (quoted from Potter et al. 2018).

N

Comment 14: The DEIR uses the term “digressional ponding” on pages 91 and 104. *Depressional* ponding is probably what is meant and the edit should be made.

O

Comment 15: On page 102, the discussion of valley elderberry longhorn beetle (VELB) states the mitigation measures BIO-1 through BIO-12 will minimize and avoid impacts. BIO-1 through BIO-12 contain unrelated mitigation for other species such as Swainson’s hawk and swallows. Only BIO-1, -7, -9, and -11 are specifically for VELB. BIO-5 and -8 do not directly relate but might also mitigate for VELB indirectly.

P

Comment 16: On page 102, the paragraph labeled “Sensitive Natural Communities” should simply be deleted. The paragraph discusses special-status plants, but it is Impact BIO-1 in the previous section that discusses special-status species. Sensitive natural communities are not the same as special-status plants. In the BSA, the valley foothill riparian, mixed willow scrub, drainage, and depressional wetland should be considered sensitive natural communities.

If this paragraph is kept, it should be rewritten to discuss sensitive natural communities, although there would be nothing to discuss because riparian habitat and waters are already discussed elsewhere in the DEIR. Also, the reference made to mitigation measure BIO-4, which is for nesting swallows, would need to be corrected.

Q

Comment 16: On page 102–103, there is a paragraph labeled “Riparian Habitat” that discusses the Sacramento Drainage Canal. It says there is no riparian habitat along the Canal, and that “No other riparian habitat is present within the BSA.” This paragraph should not discuss the

Sacramento Drainage Canal because there is no riparian habitat there, and it is already discussed elsewhere as a potential waters of the U.S. Figure 13 of the DEIR identifies valley foothill riparian and mixed willow scrub in the BSA. These are the communities that should be discussed in this paragraph. They are avoided by the project design and there will be no impacts. I recommend replacing this paragraph with the following paragraph.

The BSA contains 0.97 acre of valley foothill riparian along the Sacramento River and 0.17 acre of mixed willow scrub along a drainage. The design avoids both of these riparian communities and the Project will have no impact.

The paragraph goes on to briefly discuss jurisdictional waters in general. That should also be deleted and the discussion of jurisdictional waters left to its own section.

R

Comment 17: On page 103–104 the DEIR discuss the two depressional wetlands. The DEIR concludes that the wetlands are not waters of the U.S. or State because they are isolated and do not connect to any other features. Under the old waters of the U.S. rule, this conclusion may have been valid at the federal level. However, in August 2018 a court decision resulted in the 2015 waters of the U.S. rule becoming valid in California. The 2015 waters of the U.S. rule does not use “isolated” as a standard in determining Clean Water Act (CWA) Section 404 jurisdiction. The wetlands may still not qualify as waters of the U.S., but it is not because they are isolated.

Furthermore, the wetlands are not disqualified as waters of the State if they are not waters of the U.S., and the DEIR should not presume that is the case. The State Water Resources Control Board routinely exercises State jurisdiction over features that are not waters of the U.S. during the CWA §401 water quality certification process. The Water Board’s standard section 401 application requests impacts and mitigation for “non-federal waters” and the Water Board routinely regulates them under the State Porter-Cologne Water Quality Control Act.

The very important point that the DEIR leaves unspoken is that it appears based on the DEIR figures that the Project Design avoids any fill of the wetlands. If this is the case, this needs to be clearly stated. Avoiding any fill of the wetlands avoids the need for permitting by avoiding the resource. The question of the wetlands qualifying as waters of the U.S. or State becomes moot.

S

Comment 18: Mitigation Measure BIO-3 states in part “*If vegetation removal is to take place during the nesting season, a pre-construction nesting bird survey must be conducted within seven days prior to vegetation removal. Within two weeks of the nesting bird survey, all vegetation cleared during these surveys must be removed by the contractor.*”

This is unclear. The first sentence says survey within 7 days of vegetation removal. The second sentence says vegetation must be removed within 2 weeks of the survey. The second sentence may be differentiating between vegetation clearing, and removal of slash piles from the site. If that’s the case, then replacing the 2 occurrences of the word “removal” in the first sentence with “clearing” would fix it.

T

Comment 19: Mitigation Measure BIO-18 requires ESA fencing around “jurisdictional waters.” BIO-18 should be revised to include the ESA fencing around the depressional wetlands as well (see comment 17 above).

U

Comment 20: On page 145 the DEIR notes that drought-tolerant native landscaping will be introduced among the existing tracks and rails. It should be noted in this discussion that under the baseline conditions trees and shrubs are already growing within the railroad tracks. Figure 8 on page 18 of the DEIR shows one example of a tree sapling growing within the tracks. In other areas in the BSA there are much larger and more mature trees growing within the tracks.

V

Comment 21: I can not find 2 of the parcels in Table 23 on Figure 19 (APNs 017-0020-005, and 017-0010-031). Five of the parcels shown on Figure 19 are not in Table 23 (APNs 029-0081-026, 029-0070-019, 031-0620-002, 031-0211-014, 031-0211-013).

Both Table 23 and Figure 19 would be much easier to use if the owner information from the Table were simply labeled on the Figure, as there is plenty of room to add it.

W

Comment 22: On page 259, the second to last paragraph on the page states the northern parking lot will be on the corner of Darnel Way and Riverside Blvd. This should be corrected to San Mateo Way and Riverside Blvd.

Thank you,



Chuck Hughes

References

- Center for Biological Diversity (CBD). April 2003. Petition to the State of California Fish and Game commission and supporting information for listing the California population of the western burrowing owl (*Athene cunicularia hypugaea*) as an endangered or threatened species under the California Endangered Species Act. Petitioners: CBD, Defenders of Wildlife, CA State Park Rangers Association, Santa Clara Valley Audubon Society, San Bernardino Valley Audubon Society, Tri-County Conservation League.
- Jepson Flora Project. Accessed 30 December 2018. Jepson Online Interchange for California floristics. <http://ucjeps.berkeley.edu/interchange.html>
- Potter, D., H. Bartosh, R. Bittman, and J. Preece. 2018. Clarifying the conservation status of Northern California black walnut (*Juglans hindsii*) using microsatellite markers. *Madroño* 65:3, pp. 131–140.
- San Joaquin Council of Governments (SJCOC). November 2000. San Joaquin County Multi-Species Conservation and Open Space Plan.
- Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California vegetation, 2nd ed. California Native Plant Society, Sacramento, CA.
- Yolo Habitat Conservancy (YHC). April 2018. Yolo Habitat Conservation Plan/Natural Community Conservation Plan. Prepared by ICF.

Response 73A:

Thank you for your comments. The definition of “special-status” species has been made consistent throughout the document.

Response 73B:

“Federal and State sensitive species” and “Federal and State protected species” has been revised to “Federal and State special-species.”

Response 73C:

The caption for Table 7 has been revised from “Listed and Proposed Species with the Potential to Occur or Known to Occur in the Project Area” to “Special-Status Species with the Potential to Occur or Known to Occur in the Project Area.”

Response 73D:

Vegetation communities were reevaluated with the acreage presented in the document. The following information was confirmed.

BSA Totals Approximately 249 acres		
Vegetation Community	Acres Present	Approximate Percentage of BSA
Drainage	0.57	0.23%
Depressional wetland	0.05	0.02%
Ruderal/disturbed grassland	57.30	23%
Valley foothill riparian	0.97	0.39%
Mixed Willow Scrub	0.17	0.07%
Urban (grass lawns, ornamentals, hedges)	128.63	52%
Barren	61.20	25%
Total	249	100%

After the confirmation of the data the discussion of dominant and minor vegetation communities has been revised to the following; “The Project area is highly disturbed and the dominant vegetative communities within the BSA include: ruderal/disturbed grassland, urban (grass lawns, ornamentals, hedges), and barren. Many of the urban tree plantings include thick patches of ornamentals interspersed with native and non-native oak trees. Minor habitat types include drainage, depressional wetland, mixed willow scrub, and small portions of valley foothill riparian where the Project area borders the Sacramento River (see Figure 14: Vegetation Communities and Waters within the BSA).”

Response 73E:

The vegetation communities within the Project area were classified using CDFW's A Guide to Wildlife Habitats of California (1988). "Ruderal/disturbed grassland" classification was selected based on the definitions and maps provided in the CDFW guidelines. The vegetation community's final designation was founded on the fact that the area contained more grassland habitat characteristics (i.e. species present during surveys, physical setting, biological setting etc.) than any other habitat characteristics presented in CDFW's guidelines. Additionally, although various trees are scattered throughout the habitat, the classification of ruderal/disturbed grassland was more representative since the density of trees fluctuates throughout the Project area. For example, the density of trees is great at the norther terminus of the Project due to the close proximity of the Sacramento River, where as the southern terminus of the Project and along the majority of the railroad corridor contains a considerably smaller number of trees. The classification of ruderal/disturbed grassland is a better representation of the habitat throughout the entire Project area

Response 73F:

The classification of "oak woodland" has been revised to the more representative term "native and non-native trees." Revisions were made in the Chapter 2, Section 2.1 Aesthetics and Visual Resources section, as well as in the caption for Figure 7.

Response 73G:

In Table 7, the term "mixed Valley Oak woodland" to "mixed trees, including native and non-native oaks."

Response 73H:

Revisions from Comments 5, 6 and 7 (above) have been included in the document as suggested.

Response 73I:

The Potential for Occurrence and Rationale in Table 7 for the conservancy fairy shrimp has been revised to discuss the documented CNDDDB that is the nearest to the Project area (occurrence #19).

Response 73J:

The Potential for Occurrence and Rationale in Table 7 for the burrowing owl has been revised to following: "**Presumed Absent:** The BSA contains semi-suitable grassland habitat for the species and small mammal burrows were observed along the abandoned railroad corridor. However, grasslands that are within the BSA are highly disturbed and seasonally mowed. The seasonal mowing has compacted the soils and soils within the BSA are not considered friable, which is a nesting requirement for the species. The BSA is dominated by residential urban areas, which do not provide suitable foraging habitat for the species. Additionally, residential urban areas provide habitat for feral animals and pets, which are documented as significant predators of the species.

The nearest CNDDDB occurrence is within 1 mile of the BSA within open agricultural area south of the BSA. Due to the fact the BSA lacks suitable nesting and foraging habitat, and because the species was not observed during biological surveys, the species is presumed absent from the BSA.”

Response 73K:

The mistaken reference to burrowing owl within the Potential for Occurrence and Rationale in Table 7 for least Bell’s vireo has been corrected.

Response 73L:

The Potential for Occurrence and Rationale in Table 7 for the white tailed-kite has been revised from “Presumed Absent” to have a “Low to Moderate” potential of occurring within the BSA. The rationale has been revised to the following; “**Low to Moderate:** The BSA does not contain suitable large nesting trees or suitable grassland or agricultural areas for foraging. However, there are suitable nesting trees and suitable foraging habitat adjacent to the southern terminus of the BSA. Additionally, there are several CNDDDB documented occurrences within a 10-mile radius of the BSA. The nearest CNDDDB occurrence is 3 miles southeast of the BSA within Stone Lakes National Wildlife Refuge. Due to the adjacent suitable habitat present, and the high number of documented local occurrences, the species is considered to have a low to moderate potential of occurring within the BSA.” A discussion of the special-status species has also been included in Chapter 2, Section 2.3 Biological Resources.

Response 73M:

The Potential for Occurrence and Rationale in Table 7 for California Black Walnut has been expanded for clarity purposes and has been revised to the following; “**Presumed Absent:** The BSA contains a small area of suitable riparian habitat along the Sacramento River. According to CNDDDB, the population of the species along the Sacramento river has been extirpated from the area but scattered trees do remain; however, the individual trees currently found along the river are not given the classification of a special-status resource (Jepson 2018). Due to the documented extirpated special-status population of the species along the Sacramento River, the species is considered absent from the BSA.”

Response 73N:

The term “digressional ponding” has been revised to “depressional,” as suggested.

Response 73O:

Avoidance and minimization measure for VELB have been updated to include all measures that will directly and indirectly minimize and avoid any potential impacts to the species, as requested.

Response 73P:

The paragraph on Sensitive Natural Communities has been revised to the following: “Prior to field surveys, a list of regional sensitive natural communities with potential to occur within the Project vicinity was compiled from database searches. During May 12th and May 17th biological/botanical surveys did not identify any sensitive natural communities within the BSA. No impacts to sensitive natural communities are anticipated.” The following paragraph discussing special-status plant species was included in Chapter 2, Section 2.3 Biological Resources under the sub-heading of Special-Status Plant Species; “Prior to field surveys, a list of regional special status plant species with potential to occur within the Project vicinity was compiled from database searches and 24 sensitive plants were found to have the potential to occur within the BSA (Table 7). The potential for each species to occur within the BSA was determined by analyzing the habitat requirements of each species and comparing the habitat requirements to available habitat within the BSA. However, the May 12th and May 17th biological/botanical surveys did not identify any special status plant species within the BSA. No impacts to special status plant species are anticipated.”

Response 73Q:

The discussion of Riparian Habitat has been revised to the following: “The BSA contains 0.97 acre of valley foothill riparian habitat, located along the Sacramento River and 0.17 acre of mixed willow scrub, located along a drainage. The final Project design avoids both of the riparian communities. No impacts to riparian communities are anticipated.”

Response 73R:

Waters within the BSA and Natural Environment Study (Minimal Impact) were evaluated and finalized by the Federal lead agency during the previous waters of the U.S. rule regarding isolated features. This EIR reflects the findings within the 2018 NESMI.

Response 73S:

Measure BIO-3 is a standard measure presented by CDFW; therefore, no revisions to the standard language have been made.

Response 73T:

The proposed project would require ESA fencing around jurisdictional features and special status species. The depressional wetland is not a protected feature; however, the City will make all efforts to preserve natural habitat where feasible.

Response 73U:

The City recognizes that there are trees of varying size within the existing tracks and rails. Landscaping and tree removal plans will be developed during final design.

Response 73V:

The Build Alternative would not require acquisition of private property. The Build Alternative aims to improve pedestrian and bicycle access throughout the South Land Park and Pocket communities, and provide multi-modal connectivity to adjacent communities throughout the Sacramento area. No impacts would occur to the surrounding communities. The Project would result in improved accessibility for surrounding communities. The Project will not displace any number of existing housing or necessitate the construction of replacement housing. Table 23 summarizes the APN parcel numbers and owners that may require full or partial acquisitions, or temporary construction easements for the Build Alternative at this preliminary review stage. Figure 20 depicts all APN parcels that are located in the Direct Impact Area and the potential ROW for the Build Alternative.

Response 73W:

The text has been revised to state that the parking lot would be constructed along San Mateo Way and Riverside Boulevard.

Comment 74: Chuck Robuck (January 1, 2019)

Tom Buford

From: Chuck Robuck <[REDACTED]>
Sent: Tuesday, January 1, 2019 4:35 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com; Mayor Steinberg
Subject: Del Rio Trail Draft EIR

I have served as a Docent at the California State Railroad Museum in Sacramento for the past seven years after retiring from Sacramento Superior Court in 2012. During that period I have volunteered nearly 2,000 hours and have driven countless miles from my home near Auburn to work on the Sacramento Southern Railroad (SSRR). I've met literally thousands of passengers from both the Sacramento area and around the world who enjoy the Museum's Excursion Trains that run from April through December each year. To me, these trains are an integral part of the Railroad Museum experience that has showcased Sacramento's rich Railroad history and helped make Sacramento a must-visit destination.

For years, there have been plans to expand our relatively short, 3-mile excursion trips between Old Sacramento and Land Park, a small fraction of the original 30-miles of the original SSRR line that stretched to Isleton. But due to lack of funding and other issues, this expansion has not yet occurred.

Now, we are faced with losing the possibility of ANY further expansion beyond Sutterville Road because of the proposed Del Rio Trail (DRT) Project.

I whole-heartedly support the efforts of the Sacramento Rail Action Group in challenging the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) based on it being incomplete, inaccurate, and clearly anti-rail.

Here are the specifics of our concerns:

- A** • The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried.
- B** • The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations.
 - The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR provided maintenance. Longer excursion rides mean more visitors to the City, who are spending more. The reputation of the City as a tourist destination is enhanced.
- C** • The DEIR is incomplete with no description of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving equipment from Old Town in the north to Meadowview in the south. From Meadowview, excursion trains can run further to Hood.
 - The DEIR is incomplete is that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, the city must make us whole again with an equivalent rail connection.
 - The DEIR is incomplete is that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, the city must make us whole again with an equivalent rail connection.

D

- The DEIR is incomplete without a description of the CSRM and SSRR mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood. The DIER is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.
- The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clear in the DEIR. Please help correct these biases in the next version of the EIR. Include the value of a fully intact WGBL. Include the mitigation value of a rails-with-trails solution.

I am just one of over 500 volunteers who help keep Sacramento's rail history alive for generations of residents and visitors to this great city. Please help support our efforts by considering the vital role of the SSRR in the future of Sacramento.

Thanks for your time and consideration.

Chuck Robuck



Response 74A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 74B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 74C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 74D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 75: Jake Henshaw (January 1, 2019)

Tom Buford

From: Jake Henshaw [REDACTED]
Sent: Tuesday, January 1, 2019 10:55 AM
To: Tom Buford; slpna@slpna.org
Subject: Del Rio Trail

Mr. Buford,

I'm writing in support of the proposed Del Rio Trail. As a resident of South Land Park Hills, I believe the trail would increase transportation options for our neighborhood as well as the entire region by offering nonautomotive methods of accessing an expanded portion of our wonderful community at large.

The trail, of course, would provide many other benefits including reduced air pollution, increase mobility access for the disabled, and a safer route for traveling the community, especially by school children.

Thank you and your public and private colleagues for the work on this important project to date and best wishes in making it a reality.

Jake Henshaw
[REDACTED]

Response 75:

Thank you for your comment and support of the Del Rio Trail project.

Comment 76: Joann Cole (December 31, 2018)

Tom Buford

From: Joann Cole [REDACTED]
Sent: Monday, December 31, 2018 10:27 AM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: DEIR for the proposed Del Rio Trail

Mr. Tom Buford

Manager, Environmental Planning Services
City of Sacramento
Community Development Department
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811

Mr. Buford:

I am concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.

A

The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried.

B

The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations. The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR provided maintenance. Longer excursion rides mean more visitors to the City, who are spending more. The reputation of the City as a tourist destination is enhanced.

C

The DEIR is incomplete with no description of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving equipment from Old Town in the north to Meadowview in the south. From Meadowview, excursion trains can run further to Hood.

The DEIR is incomplete is that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, the city must make us whole again with an equivalent rail connection.

The DEIR is incomplete without a description of the CSRM and SSRR mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The DIER is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clear in the DEIR. Correct these biases in the next version of the EIR. Include the value of a fully intact WGBL. Include the mitigation value of a rails-with-trails solution.

Sincerely,
Joann Cole
2645 Ribier Way

Response 76A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 76B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 76C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 76D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 77: Joseph Mikula (December 31, 2018)

Tom Buford

From: Joseph Mikula - [REDACTED]
Sent: Monday, December 31, 2018 12:03 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: EIR for the Proposed Del Rio Trail

Mr. Tom Buford

Manager, Environmental Planning Services
City of Sacramento
CommunitEy Development Department
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811

Mr. Buford:

I am concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.

A

The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried.

B

The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations. The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR provided maintenance. Longer excursion rides mean more visitors to the City, who are spending

more. The reputation of the City as a tourist destination is enhanced.

C

The DEIR is incomplete with no description of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving equipment from Old Town in the north to Meadowview in the south. From Meadowview, excursion trains can run further to Hood.

The DEIR is incomplete is that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, the city must make us whole again with an equivalent rail connection.

The DEIR is incomplete without a description of the CSRM and SSRR mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The DIER is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clear in the DEIR. Correct these biases in the next version of the EIR. Include the value of a fully intact WGBL. Include the mitigation value of a rails-with-trails solution.

Sincerely,
Joseph Mikula

Response 77A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 77B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 77C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 77D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 78: William Myers (January 1, 2019)

Tom Buford

From: William Myers [REDACTED]
Sent: Tuesday, January 1, 2019 8:54 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Del Rio Trail

William R Myers
[REDACTED]

Mr. Tom Buford

Manager, Environmental Planning Services
City of Sacramento
Community Development Department
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811

Mr. Buford:

I am concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.

A

The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried.

B

The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations. The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR provided maintenance. Longer excursion rides mean more visitors to the City, who are spending more. The reputation of the City as a tourist destination is enhanced.

C

The DEIR is incomplete with no description of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving equipment from Old Town in the north to Meadowview in the south. From Meadowview, excursion trains can run further to Hood.

The DEIR is incomplete is that it does not state how the City will reconnect our northern rails with our southern rails. If the rails are pulled, the city must make us whole again with an equivalent rail connection.

The DEIR is incomplete without a description of the CSRM and SSRR mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The DIER is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clear in the DEIR. Correct these biases in the next version of the EIR. Include the value of a fully intact WGBL. Include the mitigation value of a rails-with-trails solution.

Sincerely,

William R Myers

Response 78A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 78B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 78C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 78D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 79: Bob Parkins (January 8, 2019)

Tom Buford

From: Bob Parkins [REDACTED]
Sent: Tuesday, January 8, 2019 5:52 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Fwd: Comments on the Del Rio Trail Draft EIR (DEIR) (K15165100)

----- Original Message -----

From: Bob Parkins <bparkins@comcast.net>
To: "TBuford@Cityofsacramento.org" <TBuford@Cityofsacramento.org>
Cc: "SacRailActionGroup@Gmail.com" <SacRailActionGroup@Gmail.com>
Date: at
Subject: Comments on the Del Rio Trail Draft EIR (DEIR) (K15165100)

From: Bob Parkins

[REDACTED]

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

Re: Comments on the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

I am writing this to express my profound objection to the Del Rio Trail DER. As a 45-year resident of Sacramento and volunteer at the State of California Railroad Museum, I have a passion to preserve the world class and historically significant railroad resources we have. Early in its history, Sacramento became and flourished as a major railroad hub.

It was the western terminus for the first Intercontinental Railroad, which linked America together. The Southern Pacific Railroad Works were the largest industrial facility west of the Mississippi for many decades from 1869 until the years before World War II. The agricultural empire known as the Sacramento and San Joaquin Valleys were only possible because the railroad from Sacramento carried the farm products to market back east. Soldiers and sailors and war material poured through Sacramento on the railroad on their way to the Pacific Theater in World War II.

In five years as a docent in the museum, I can remember one day when I did not speak to an international visitor. Foreign visitors have told me they specifically came to Sacramento, or took a diversion from their travels through California, to visit the Railroad Museum. Many have confirmed that the museum is among the best in the world and, to many, their favorite. They not only cited the quality of the exhibits but also the experience of riding in operating vintage and historical railroad cars on the Sacramento Southern Railroad (SSRR), the Museum's operating educational railroad. Last year 45,000 people experienced the train rides. Now I learn that a handful of people, an "elite" group that has political influence, are essentially threatening to de-rail what has put Sacramento on the map. The international community, which brings its money to Sacramento, and local citizens, especially children, deserve to continue to enjoy the railroad experience, including the Walnut Grove extension. Finally, a simple solution already exists for multiple use of the railroad right-of-way: a combination rail and asphalt trail as currently exists from the I-5 RR bridge near Sutterville Road north to Old Sacramento.

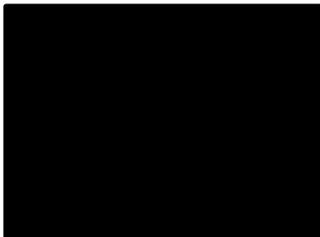
A

B

Sacramento has a wonderful opportunity to excel by developing the Walnut Grove Branch Line for rail purposes while, at the same time, duplicating the trail friendly features that already exist along the SSRR track. Or it can choose to "cave in" to a very small group that is blocking what is the greater good of Sacramento and northern California.

Sincerely,

Bob Parkins



Response 79A:

Thank you for your comment. The City of Sacramento does recognize the current level of interest in Old Sacramento, rail-related history, and its importance to the community. The City of Sacramento developed the Old Sacramento State Historic Park General Plan and 2014 FEIR to guide the development, ongoing management, and public use of the Old Sacramento State Historic Park for the next 20 years or beyond. This Plan includes opportunities to expand historic rail usage through future projects and expand opportunities for the community and tourists to experience and learn about Sacramento's rich railroad history.

In addition, through the development of the Del Rio Trail project, the City coordinated with the California State Railroad Foundation, addressing their concerns regarding track removal by reducing track impacts from 50% to 2% of the track in the project area.

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project will not preclude an excursion train from being proposed along this alignment in the future. The project will preserve the majority of the existing track, including its metal rails, wood ties, and gravel ballast. Track removal is only proposed where necessary for safety reasons.

Response 79B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Comment 80: DJ Adam (January 8, 2019)

Tom Buford

From: DJ Adam [REDACTED]
Sent: Tuesday, January 8, 2019 6:58 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Via Email To: TBuford@CityOfSacramento.Org

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

Mr. Buford:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

- A** The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.
- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
- C** The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.
- D** The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.
- E** The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

Sincerely,

DJ Mandella
Folsom, CA

Response 80A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 80B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 80C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a

public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 80D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 80E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 81: David Mccarthy (January 7, 2019)

Tom Buford

From: David Mccarthy [REDACTED]
Sent: Monday, January 7, 2019 5:19 PM
To: Tom Buford; SacRailActionGroup@Gmail.com

David McCarthy
[REDACTED]

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

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

- A** The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.
- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
- C** The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.
- D** The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.

E

The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

And honestly this would destroy any hope of expansion on the most culturally interesting part of Sacramento and activity shooting tourism to Sacramento in the foot. It is intentionally weakening the appeal of Old Sacramento State Historic park, which is the biggest draw for tourism to Sacramento. If you will not fund the expansion and improvement of Old Town at least do not create road blocks for those who do.

Sincerely,

David McCarthy

Response 81A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 81B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has

determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 81C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 81D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 81E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 82: Arthur Fluter (January 13, 2019)

Arthur Fluter



January 13, 2019

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

VIA EMAIL: tbuford@cityofsacramento.org

Re: Deficiencies in the Del Rio Trail (DRT) Project Draft EIR (DEIR). Specifically, the DEIR does not present a Rail-With-Trails solution as the best and only mitigation method.

Mr. Buford:

The DEIR for the Del Rio Trail project is incomplete in many ways. My comments in this letter address the missing solution that could be provided using established Rails-With-Trails (RWT) methods and procedures. The RWT documents attached provide numerous case histories and technical details about the success of RWT.

Tom, it is important that you note the conclusion to this letter. In the conclusion, I describe how the City of Santa Cruz created world class rail-with-trail along the Pacific Coast. The trail has stunning views of the ocean, with trains carrying passenger, excursion, and freight. It has a trail for pedestrians, runners, and bikers. And it is 32 miles of unalloyed beauty for all the people of California. **32 miles.** Can you imagine 32 miles of rail and bike and walking bliss? This could be your gift to the City and all those who will come after us.

Or, we could have the Del Rio Trail, a private amenity for the rich and power and selfish. Does the City have a heart? I wonder?

Sincerely,

Arthur Fluter

Attachments

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

Executive Summary

Rails-With-Trail Direct Benefits

The immediate direct benefits of this approach are significant:

- Lower overall trail cost
- Faster construction and trail completion
- Less noise and disruption for homeowners along the trail
- Faster trail use for walkers, bikers, and runners
- Lower maintenance costs for the City of Sacramento through the use of SSRR Maintenance-Of-Way (MOW) crews.
- Increased security presence along the trail due to the MOW crew presence, and the immediate assistance of State Park rangers if needed.

Rail-With-Trail Goodwill Benefits

These direct RWT benefits to the City and the people of Sacramento, would likely be combined with the intrinsic and extrinsic goodwill generated from these groups:

- California State Parks System (CPS)
- California State Railroad Museum (CSRM)
- Sacramento Southern Railroad (SSRR)
- California State Railroad Museum Foundation (CSRMF)
- Sacramento Rail Preservation Action Group (SRPAG)
- Other local area heritage excursion rail groups.

City Economic Benefits from SSRR Operations

It should be noted by you and the City that the CSRM and the SSRR purchase most of their operating supplies and equipment from local businesses. For example, our locomotive fuel is purchased from a local vendor located in West Sacramento. Expanded rail operations would lead to expanded CSRM/SSRR purchasing in the local area.

Benefits to Sacramento's Tourist Attractions

The effect of a longer heritage train excursion train would further expand Sacramento's reputation as the premier heritage railroad attraction in the Western United States. This expanded reputation would have numerous positive effects on area tourism:

- Currently, the combination of the CSRM and the SSRR pull in some 300,000 museum visitors and over 40,000 riders each year. Every year, the Polar Express holiday event sells out 24,000 tickets in just a few days.
- The CSRM/SSRR combination acts as the economic "anchor store" for the "mall" of Old Town.

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

- Rail fans spend lots of money on Sacramento amenities and services and other attractions.
- Rail fans visiting Sacramento will be attracted to other Sacramento amenities, sports events, museums, and attractons.
- This influx of additional rail fans will provide local business owners with increased revenues.

Summary

A rails-with-trails solution is the best possible mitigation method for the planned Del Rio Trail. This solution would benefit the City of Sacramento, the users of the Del Rio Trail, and the CSRM/SSRR. It would preserve the historic Sacramento Southern Railroad/Walnut Grove Branch Line. It would protect the SSRR's operational franchise to the south, and continue our expansion towards the city of Hood.¹

A

Rails-With-Trails

Introduction

RWTs, which are trails located adjacent to active rail lines, are valuable assets in providing safe transportation networks for pedestrians and bicyclists. The RWT technique is used with all types of railroads, at all levels of rail traffic, and many different distances and types of trail/rail separation.

RWT is Established Internationally

Rails-with-trails are established in multiple countries. Hundreds of kilometers of rails-with-trails traverse Western Australia, Canada, and European countries such as Switzerland, Denmark, and the Netherlands.²

RWT is Established in the U.S.

As of 2018, there are more than 350 rails-with-trails in the United States, with active trail and railroad corridors totaling more than 930 miles—and more are being built each year.³

At least 60 more rails-with-trails are known to currently be in various stages of development.⁴

¹ See the last page of this document for all cited references.

² USDOT 2002

³ ARWT, 2013

⁴ ARWT, 2013

In another study, over 220 rails-with-trails were listed in over 40 states. These rails-with-trails count for over 2,200 miles of total trail, with 695 miles of trail running alongside an active rail line.

RWT is Established in California

The latest available report on California rails-with-trail solutions is from 2009. In the introduction, the report states:

Every day, thousands of Californians safely use and enjoy trails located along active rail lines. Because these trails offer access to transit, transportation options to important destinations, and recreational and exercise opportunities, rail-with-trail projects are booming in California. Railroads and transit agencies have mixed responses to the trails, but in some cases they have been embraced to increase ridership and reduce trespassing across the tracks. Rail-with-trails projects are a valuable tool to improve the transportation network for bicycles and pedestrians, while at the same time improving access to open space and providing recreation opportunities.

RWT solutions are growing in the U.S.

As of 2013, total trails have reached 1,397 miles, with over 500 miles of trail adjacent to rails. This solution is used on more than 40 states.⁵

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

The total mileage of rails-with-trails has also increased over the past decade. The total mileage of trails located completely or partially along active railroad corridors is 1,397 miles, up from 523 miles in 2000. Not all rails-with-trails run along or within active rail lines for their entire length. Of the 820 total miles of trail inventoried in this study, 321 miles (39 percent) are adjacent to active railroad corridors. A majority (63 percent) of the 88 trails examined have more than half of their length along active railroads, with the range of "rail-with-trail length" varying between 0.07–22 miles.

Rails-with-Trails in the United States			
Date	Total Trail Length (in miles)	Percent parallel to active rail line (miles)	# of states with rails-with-trails
1996	299	51%	N/A
2000	523	46%	20
2013 (88 trails)	820	39%	33
2013 total	1,397	39%	41

RWT solutions are safe

The solution we propose is called rails-with-trails. RWT already exists in Sacramento on the SSRR on the existing 3 mile line from Sacramento to Baths station just before the I-5 bridge. The SSRR has portions where the trail is elevated, where it is separated by a fence, and where it runs parallel with about 10 feet separation with no fence. Included in the SSRR current operations are multiple grade crossings, plus a complicated one at the Tower Bridge. In over 30 years of operation, the SSRR has transported over 2 million riders. Railroad safety is the SSRR priority. During that time, the SSRR has not had a single accident with pedestrians, bicycles, or automobiles.

The SSRR is a Federal Railroad Administration (FRA) Class III railroad, which are general referred to as "short line railroads."⁶ The short line SSRR is licensed by the (FRA) to carry passengers along our tracks.

RWT solutions use a variety of rail/trail separations

Some examples of separations from other railroads and cities.

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution



Charlotte Trolley RWT, NC



Schuykill River Train, PA

Ar [REDACTED]

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution



D&L Trail, PA

The Rails-With-Trails Solution for the Del Rio Trail

A RWT solution saves a valuable resource for future generations

RWT usage preserves a valuable city resource for an unknown future. The SSRR takes care of the rails so that the City can take care of the future.

Smoke is not an SSRR issue for RWT on the DRT

A number of errors, misrepresentations, and exaggerations about SSRR operations have crept into the rhetoric about the DRT. The DEIR must be corrected to state the true facts about SSRR operations.

One issue raised was that of excessive smoke from our locomotives. The illustration used was from a coal-burning locomotive from the East Coast or England from the 1940s. This is a false and inaccurate issue.

All of the SSRR locomotives are either diesel electric or oil burning steam. The diesels burn the same fuel as do thousands of trucks that pass by Sacramento on the I-5 corridor, that pick up garbage around town, and that UPS uses to deliver packages.

The steam locomotive burns recycled motor oil with the nearly the same smoke output as a diesel locomotive. When considering the SSRR's request for a single positioning train on weekends, the smoke problem is non-existent. Neighbors along the Del Rio Trail route will receive more smoke from the local garbage and delivery trucks.

Vibration is not an SSRR issue for RWT on the DRT

Earlier EIRs did vibration studies and found no effects. Businesses in Old Town have had SSRR trains running past them 6 times a day for 30 years with no effect. Again, the

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

SSRR wants to run a single positioning train on the weekends. The train will pass in a few seconds. The slow speed will reduce any vibration even more.

Speed is not an SSRR issue for RWT on the DRT

The tracks on the DRT area have an FRA mandated maximum speed of 25 mph. The normal SSRR positioning speeds are similar to those on the rails just north of the Tower Bridge, usually in the 5 to 10 mph range.

Noise is not an SSRR issue for RWT on the DRT

Yes, the locomotives do have a horn (diesel) or whistle (steam) that can reach 100 dB of noise. But, it is only used at full volume for an emergency. In normal operation, the horn is quieter, and is “feathered” by the locomotive engineer.

Further, FRA rules allow for “no horn” quiet zone, such as those in residential areas. Specific signage is displayed, notifying the public that the quiet zone exists. Again, if an emergency is encountered, the appropriate horn/whistle volume can be used.

RWT in the DRT has security benefits for the community

RWTs showing improvements in vandalism and crime included the:

- ATSF Trail, California
- LaCrosse River State Trail, Wisconsin
- Mission City Trail, California
- Platte River Trail, Colorado
- Schuylkill River Trail, Pennsylvania
- Railroad Trail, Missouri.

Planned trails expecting to see such improvements include the Springwater Corridor Oregon, Five Star Trail Pennsylvania, and Coastal Rail-Trail California.

The Canadian Pacific Railway (CPR) Police Service has had dramatic results in reduced crime by the use of a living fence on the Waterfront trails. The RWT design have improved the aesthetic Bikeway.

One approach relies on the concept of “Crime Prevention Through Environmental Design” adopted by the Canadian Pacific Railway Police Service, 2000, (CPTED), meaning, “the proper design and effective use of the built environment can lead to a reduction in the incidence and fear of crime – and to an increase in the quality of life” Such designs attract families and large numbers of commuters and recreational users and discourage vandals and criminals, who thrive in abandoned, ugly areas.⁷

The SSRR anticipates that an active railway along the DRT will have the same effect.

⁷ USDOT 2002

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

The SSRR is required by the FRA to inspect its tracks and signals on a recurring basis, usually every week. A typical cycle is a track inspector reviews the current right-of-way and notes any corrections or maintenance to be made. Then, usually on the weekend, maintenance-of-way (MOW) workers fix the problem. Work is never started before 10:00 am and always completed by 4:00 pm.

The security benefit of the MOW and other activities is that multiple SSRR personnel are patrolling the rails, and the neighborhood. We have a presence. We are professionals and look professional. We carry radios. If problems of a criminal nature are encountered, a radio call is made to a State Park Ranger to assist in resolving the problem. Professional railroad presence plus necessary ranger backup will signal a secure area and crime will probably leave the area and focus elsewhere.

An additional community benefit is that many SSRR workers and volunteers are trained in First Aid and CPR. Our trains carry a heart defibrillator. If needed, SSRR personnel stand ready to assist in any way we can.

Economic benefits of RWT and an extended excursion trains to the south

As stated elsewhere, and in other letters, Sacramento, the CSRM, and the SSRR are internationally known as the premier west coast rail attraction. The addition of longer excursions to the south, through the varied lands and vistas to the south along the levee will bring a new influx of regional, national, and international visitors.

Every single one of those visitors purchases tickets to the CSRM and the SSRR. Right now, some 300,000 come to the CSRM and over 40,000 ride the SSRR. They also park their cars, eat food, buy trinkets, and see other sights in the City. Some, especially those from out of town stay in local hotels.

The direct result of the DRT RWT is increased revenue for city stakeholders.

The RWT approach and methodology is well documented

Multiple documents are available describing case histories, documenting standards and design methods used, characteristics of the rail and trail, unique challenges for many RWT sites, as well as follow-on studies.

Many of those documents are attached to this document.

RWT are used in a wide variety of rail and trail conditions

RWTs are located adjacent to active rail lines ranging from a few slow-moving short-haul freight trains weekly, to high frequency Amtrak trains traveling as fast as 225 km/h (140 mi/h). RWTs are as narrow as 5 feet with separations as little as 10 feet. Several studies have concluded that:

- RWTs are just as safe as other trails.

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

- A wide range of successful designs exist.
- About one third of trail managers believe railroad officials are supportive of the RWT. In the case of the CSRM and the SSRR, our railroad officials are very supportive of RWT solutions.
- The vast majority of RWTs are insured through existing government coverage similar to other trails.⁸
- Finally, these reports conclude that constructing a trail along an active railroad multiplies the value a community derives from the rail corridor and provides citizens with transportation options.⁹

Rail Crossing Standards

The DEIR is deficient in that no standards for rail crossings are defined. A RWT solution provides multiple rail crossing solutions.

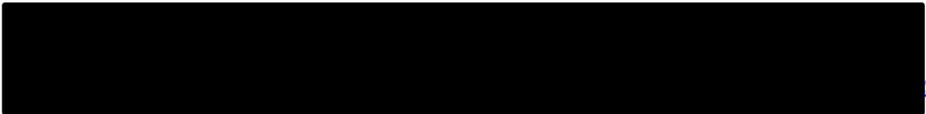


There are no national standards or guidelines dictate RWT facility design. Guidance must be pieced together from standards related to shared use paths, pedestrian facilities, railroad facilities, and/or roadway crossings of railroad rights-of-way. Useful documents include the:

- Manual on Uniform Traffic Control Devices
- AASHTO Guide for the Development of Bicycle Facilities (1999)
- Americans with Disabilities Act publications for trails and pedestrian facilities

⁸ USDOT 2002

⁹ ARWT 2013



Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

- Numerous FRA documents regarding grade crossing safety and trespass prevention.¹⁰

The DEIR does not follow any national standard recommendations for safe rail crossing designs. At a minimum, with the RWT solution, the DRT bike paths should follow these standards:

- AASHTO Guide for the Development of Bicycle Facilities (4th edition, 2012) provides guidance for “Railroad Grade Crossings” in section 4.12.1, addressing crossing angle, surfaces, bikeway width and flange opening.
- The Manual on Uniform Traffic Control Devices (MutCd, 2009 edition), in Chapter 8d. “Pathway Grade Crossings” includes guidance for shared use pathways that cross railroad corridors at grade.
- California’s North Coast Railroad Authority (NCRA) created and adopted a Policy and Procedures Manual in 2009 to “provide uniform and consistent standards on NCRA’s rights-of-way for the design, construction, safety, operations and maintenance of Rails-with-Trails Projects.” This direction requires compliance with current standards set by the California Department of Transportation (Caltrans), railroad operators.
- At the state level, Caltrans includes a section on rails-with-trails in their 2005 guidance document, Pedestrian and Bicycle Facilities in California: A Technical Reference and Technology Transfer Synthesis for Caltrans Planners and Engineers,⁶ and rail-with-trail design is addressed in Trail Planning for California Communities,⁷ a reference for trail planners in state, regional and local agencies.

RWT and width of the rail corridor

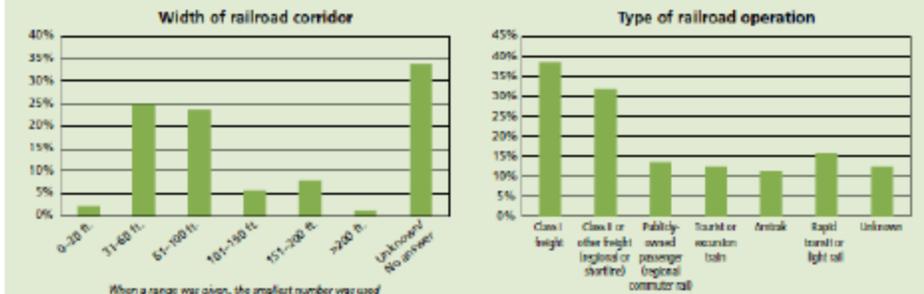
Rail corridors vary as much as trail designs do. The graphic below provides information on some of the variation:

¹⁰ USDOT, 2002

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

Characteristics of Operating Railroads

- ▶ **Corridor width**—Nearly half (43) of the railroad corridor rights-of-way studied in this report were between 31 and 100 feet wide.
- ▶ **Railroad type**—Rails-with-trails are developed within and alongside many different types of operating rail service (freight, transit, tourist, etc.), with the most common being freight. Several trails are located beside railroad tracks that serve multiple types of railroads. For example, the Metropolitan Branch Trail in Washington, D.C. is alongside a CSX corridor that Amtrak and a regional commuter railroad operate on, while another segment of the trail is located within a few feet of Metro, D.C.'s rapid transit system.



Trail surfaces also are highly varied:

- 10 feet average width
- 9.3 miles average length
- Asphalt trail surface: 84%
- Crushed stone: 20%
- Concrete: 19%
- Dirt: 5%
- Other: 1%¹¹

Set back

Set back is the lateral distance between the centerline of the nearest track and the nearest edge of the rail-with-trail or separation feature such as a fence or wall.

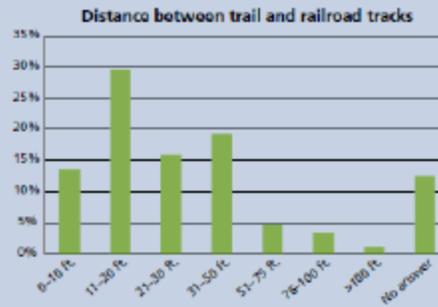
- Slightly more than 10% of all RWTs have a set back of less than 10 feet.
- Almost 30% of RWTs have set backs of between 11 and 20 feet.

¹¹ ARWT. 2013

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

Setback—The lateral distance between the centerline of the nearest track (track located closest to the rail-with-trail) and the nearest edge of the trail or the separation feature (fence, wall, etc.).

Whether the trail is within the railroad right-of-way or immediately adjacent, the actual distance between the railroad tracks and the trail may determine how design features address trail user safety. Several trail managers reported setback requirements enforced by the railroad, usually ranging from a 25 to 30-foot minimum. Nearly 60 percent of trails were 30 feet or less from the railroad tracks and more than a quarter of trails reported a minimum distance of between 11 and 20 feet. Some trails are extremely close to the tracks; the Frisco Trail in Fayetteville, Ark. comes as close as two feet from the tracks.



RWT Design

In many RWTs:

- There is no barrier between the rail corridor and the trail.
- Separation between the center line of the track and the edge of trail averages five feet.
- The trail's surface is primarily crushed stone, with a few paved sections where frequent storm damage has occurred.
- The average width of trail is 10 feet, and the trail crosses the railroad corridor 16 times over its 22.8 miles.
- All rail crossings are paved, and in each instance the trail crosses the rail line at an approximate right angle.
- There is railroad crossing signage at each of these crossing points.
- The excursion train travels at a speed of between 10 and 15 mph, and railroad staff walk ahead at each rail crossing to ensure trail users have stopped to wait for the train to cross the trail.¹²

RWT signage and markings

Signage and Markings Advisory and regulatory signs on RWTs related to transportation (stop, slow, curve ahead, etc.) should follow MUTCD standards, especially for signs that directly impact user safety. The size, frequency, location, and other aspects are clearly identified in the MUTCD or State highway design manual. Local agencies may use their own discretion for other signs, such as user protocol between pedestrians and bicyclists, speed limits, hours of use, and emergency contact information.¹³

¹² ARWT 2013

¹³ USDOT 2002



Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

An example of what can be done with a RWT approach

The City and County of Santa Cruz and the Coastal Conservancy put together a plan to create the Santa Cruz Coastal Rail-Trail, shown in the map below.



The Conservancy and others purchased the 32 mile route from Union Pacific, and created a multi-modal corridor that supports passenger, excursion, and freight rail service, while also supporting an adjacent trail for walkers, bikers, and runners.



The territory that Santa Cruz made accessible to excursion trains and pedestrians alike is stunning.

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution



This represents how the City and County of Santa Cruz, the Coastal Conservancy, and rail fans everywhere worked to achieve this stunning 32 mile exquisite experience. It is not a private amenity for a select selfish powerful few. It is a rare and unique experience that can be shared by all for all time.

Sacramento should do the same. In the picture above, substitute view of the Pacific Ocean for that of the Sacramento River. That could be our gem for our city and region and rail fans everywhere.

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

Documents to be Added to the Del Rio Trail EIR

The documents below should be added to the next version of the EIR. Each is attached as a PDF to this letter.

ARWT 2013:

America's Rails-with-Trails: A resource for planners, agencies and advocates on trails along active railroad corridors, Rails-to-Trails Conservancy, 2013

- Available at: <https://www.railstotrails.org/resource-library/resources/americas-rails-with-trails/>.

CRWT 2009:

California Rails-With-Trails, A survey of trails along active rail lines, Rail-To-Trail Conservancy, 2009

- Available at: <https://www.railstotrails.org/resourcehandler.ashx?id=2992>

LRWT 2014:

Listing of Rails-With-Trails, Rail-To-Trail Conservancy, Updated June 2004

- Available at: <https://www.railstotrails.org/resource-library/resources/americas-rails-with-trails-rail-with-trail-list/>

RWTLL 2002:

Rails-with-Trails: Lessons Learned. Alta Planning + Design and the U.S. Department of Transportation, 2002.

- Available at: <http://www.fhwa.dot.gov/environment/rectrails/rwt/index.htm>

RWT 2000:

Rails-with-Trails: Design, Management, and Operating Characteristics of 61 Trails Along Active Rail Lines, Rails-to-Trails Conservancy, 2000.

- Available at: <https://www.railstotrails.org/resource-library/resources/rails-with-trails-design-management-and-operating-characteristics-of-61-trails-along-active-rail-lines>.

SCCRTA, 2005:

- **Santa Cruz Coastal Rail-Trail Acquisition , Staff Recommendation**, Coastal Conservancy, December 8, 2005, File No. 03-043
- Available at: <https://sccrtc.org/projects/rail/rail-line-purchase/>

Re: Comments on the Del Rio Trail DEIR which needs a Rails-With-Trails solution

USDOT 2002:

USDOT, Rails-with-Trails, Lessons Learned, Literature Review, Current Practices, Conclusions, U.S. Department of Transportation, August 2002

- Available at:
https://www.fhwa.dot.gov/environment/recreational_trails/publications/rwt/rails_withtrails.pdf.

Reference Documents that Should Be Included in the EIR

Other relevant information for the rail-with-trail solution is contained in these documents, but not included with this letter. The City should add them to their reference collection.

AASHTO 1999:

American Association of State Highway and Transportation Officials (AASHTO) Guide for the Development of Bicycle Facilities, 1999, 2010, 2018

MUTCD 2000:

The Manual on Uniform Traffic Control Devices (MUTCD0), 2000

WGNRHP 1992:

Walnut Grove Branch Railroad National Register Nomination Sacramento County, California, Final Report, August 19, 1992, C-102609.

WRLTE, 2004

When the Railroad Leaves Town: American Communities in the Age of Rail Line Abandonment, Eastern U.S., Vol. 1, Joseph P. Schwieterman. 2003.

WRLTW, 2004

When the Railroad Leaves Town: American Communities in the Age of Rail Line Abandonment, Western U.S., Vol. 2, Joseph P. Schwieterman. 2004.

Response 82:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-with-Trail option is not considered a practical alternative.

The approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis.

Comment 83: Art Knoes (January 11, 2019)

Tom Buford

From: Art Knoes [REDACTED]
Sent: Friday, January 11, 2019 2:32 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Del Rio Trail Draft EIR (DEIR) (K15165100)

Art Knoes
[REDACTED]

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

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

- A** The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.
- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
- C** The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.
- D** The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.
- E** The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

It is my sincere hope that your department will consider revision of the above referenced DEIR to address the issues raised. It would be truly unfortunate if the community and those visiting the community were unnecessarily precluded from enjoying the realization of the enhanced visitor experiences outlined in the California State Railroad Museum Master Plan for the Sacramento Southern Railroad/Walnut Grove Branch Line. Thank you for your consideration.

Kindest regards,

Art Knoles

cc: Sacramento Rail Preservation Action Group, SacRailActionGroup@Gmail.com

Response 83A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 83B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the

Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 83C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 83D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 83E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 84: Dale Parker (January 13, 2019)

Tom Buford

From: Dale Parker [REDACTED]
Sent: Sunday, January 13, 2019 3:25 PM
To: Tom Buford
Subject: Proposed Del Rio Trail Project Draft Environmental Impact Report Comments
Attachments: drpanel.vcf

January 13, 2019

To: Tom Buford - Environmental Planning Services Manager
City of Sacramento
Community Development Department
300 Richards Boulevard
Sacramento, California 95811

After review of the Draft EIR of the proposed Del Rio Trail project section titled "Historic Eligibility of the Walnut Grove Branch Line of the Southern Pacific Railroad" I have the following comments:

- A** The Walnut Grove Branch Line Qualifies to be registered as a National Historic Artifact. Disturbance of it, by a planned project, must meet Federal regulations and standards developed to assure projects like the proposed Del Rio Trail do not cause adverse change or destroy its historic value. The Draft EIR states several of the standards and then describes what changes are proposed to be made and then simply states that "Therefore, the undertaking complies with Standard #". The changes might not comply. For example, using the space between the track rails as a walking trail, encasing the rails in concrete in some locations and removal of 500 feet (approx. 2% indicated) of track (1,000 feet of rail). Each required modification or deletion necessary to make the project work by itself may be a minimal impact, however, **combining** all of them together may cause a significant change in the overall historical significance of what remains of this section of the Walnut Grove Branch Line. Analysis of the **combination** of all the changes **combined** is not, or I could not find it, in the Draft EIR. That **combination** analysis must be developed objectively and thoroughly in order for the EIR ultimate judges to make a decision regarding approval or disapproval of it.
- B**

And,

- C** The Draft EIR describes a project with two trails. A wide paved biking surface and a walking, running pathway. The proposed combination of two trails is estimated to cost \$15,000,000. Shouldn't the Draft EIR describe and compare alternative and less costly designs which will have less environmental impact? Such as the trail that parallels the railroad track from the Tower Bridge to the I-5 railroad bridge.

Thank you for the opportunity to comment,

Dale Parker
[REDACTED]

Response 84A:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking path. There are no environmental or technical reasons not to consider the proposed design change. The City will consider the change during final design, and likely in consultation with the larger neighborhood.

Response 84B:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 84C:

The City of Sacramento has developed the Build Alternative and its proposed design by taking into consideration extensive public outreach in an attempt to provide the public with improved multi-modal transportation options consistent with the City's Bicycle Master Plan. Numerous changes to the Build Alternative have been made to best meet the needs and requests of the community and Project stakeholders. The most recent design change is removal of the separate walking trail facility, which was removed as a result of public comments received, and in an effort to further minimize impacts to the historic railroad facility. Full avoidance alternatives were considered during the planning stage; however, none of these alternatives met the purpose and need and/or were considered feasible from an engineering/safety standpoint. Those alternatives are discussed in EIR Section 3.1.3, Alternatives Considered but Rejected for Further Consideration.

As required by CEQA guidelines, the EIR has been updated to also include a full discussion of the No-Build Alternative as a feasible alternative to the Build Alternative.

Comment 85: Wm Gary Call (January 14, 2019)

Mr. Buford:

As you can see this is a copy of a suggested letter, however it states my feels better than I could.

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroaThe DEIR is defective due to the following issues:

A

The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.

B

The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.

C

The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.

D

The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.

E

The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

Sincerely,

Wm Gary Call

cc: Sacramento Rail Preservation Action Group, SacRailActionGroup@Gmail.com

Response 85A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 85B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 85C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a

public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 85D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 85E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Gary G. Rannefeld



January 9, 2019

COMMUNITY DEVELOPMENT
DEPARTMENT

To: Mr. Tom Buford
Manager, Environmental Planning Services
City of Sacramento
Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, California 95811

JAN 10 2019

RECEIVED

Subject: Defects in the Draft EIR for the Del Rio Trail Proposal

Mr. Buford,

Sacramento continually seems to be searching for something that will further define it as a world-class tourist destination. The creation of the Del Rio Trail as currently described in the draft environmental impact report (DEIR), however, will damage a well-known, precious and intact historical artifact, the Sacramento Southern Railroad's Walnut Grove Branch Line (SSRR-WGBL). This world-class railroad today brings hundreds of thousands of visitors to Sacramento each year; the rehabilitation of the existing rails south of Sutterville Road to Meadowview and beyond will only enhance the attraction to tourists when excursion trains can once again operate farther south along this historic route. The destruction of the integrity of this historic artifact will forever prevent any use by the railroad and would do an economic and historic disservice to the people of Sacramento and California.

A

The DEIR has completely ignored the State Parks Master Plan that includes the rehabilitation of the SSRR-WGBL to Hood. The mission of California State Parks via the California State Railroad Museum is to preserve our past and present railroad culture for the benefit of all of the people of California. The SSRR-WGBL is an integral part of this heritage and must be preserved. This should be addressed in the DEIR, but has been omitted.

B

The DEIR is defective in that it has not considered RAILS-WITH-TRAILS (RWT) as a possible satisfactory option for this property. RWT is already a safe and working reality from Old Town to the Baths area at the I-5 (bridge) undercrossing. This particular RWT consists of a simple and economical asphalt path alongside the railroad tracks. Why hasn't something similar been considered in the

preparation of the DEIR? In fact hundreds of miles of RWT exist in the United States and thousands of miles throughout the world for the mutual and safe enjoyment of excursion train riders and runners/walkers/bikers alongside.

C

The SSRR-WGBL qualified for inclusion in the National Register of Historic Places and must be protected. In its present form the DEIR would destroy the historical integrity of this artifact belonging to all Californians at the behest of a few emotional residents.

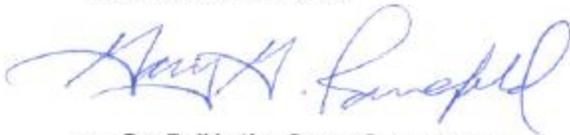
D

The DEIR is incomplete as it does not address the economic benefit to the City currently provided by the portion of the SSRR-WGBL in use now, nor does it address the potential loss of future revenue increases that would occur when the railroad is rehabilitated to allow a further extension of excursion trains.

To be perfectly clear the portion of the SSRR-WGBL that coincides with the proposed Del Rio Trail corridor is designated only for limited railroad use in the State Parks Master Plan. This rail corridor would provide a means to move railroad equipment only between Old Town and a new station in the Meadowview/Pocket Road area on an intermittent basis. Excursion trains are planned to operate only south of this new station to Hood; thus, only a few train movements per month are anticipated for maintenance purposes and any such railroad operation is years in the future.

Sacramento has an important asset in the SSRR-WGBL that should be developed for the economic benefit of the City and also preserved for the recreational and historic benefit of all of the people of California. I am counting on you to revisit the DEIR and save this historic railroad line from ill-advised, and permanent, destruction.

Respectfully submitted,



cc: SacRailActionGroup@gmail.com

Response 86A:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 86B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 86C:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of

No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 86D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 87: Greg Wroblicky (January 13, 2019)

Tom Buford

From: Greg Wroblicky [REDACTED]
Sent: Sunday, January 13, 2019 10:59 AM
To: Tom Buford
Cc: SacRailActionGroup@gmail.com
Subject: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Gregory J. Wroblicky
[REDACTED]

Via Email To: TBuford@CityOfSacramento.Org

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

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

As a member of the community who is both a railfan and an avid bicyclist who commutes to work downtown by bicycle, I'm writing to you out of concern over the Del Rio Trail DEIR. I feel strongly that it is misleading, incomplete, and must be rewritten to include a rails-with-trails option that will provide both improvement in bicycle connectivity and preservation of the Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) for future railroad operations. As it stands, the DEIR would potentially dystroy a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

- A** The impact and damage to the historic SSRR/WGBL is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.
- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
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- D** The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.

E

The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

To conclude, it is my desire that you would adopt a more multi-perspective, multi-use approach to solving bicycle, pedestrian, AND railroad-railfan needs in South Sacramento.

Sincerely,

Gregory J. Wroblicky

cc: Sacramento Rail Preservation Action Group, SacRailActionGroup@Gmail.com



Virus-free. www.avq.com

Response 87A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 87B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has

determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 87C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 87D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 87E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 88: Michael Collins (January 14, 2019)

Tom Buford

From: michael collins [REDACTED]
Sent: Monday, January 14, 2019 7:28 AM
To: Tom Buford
Subject: Del Rio Trail Draft EIR

Mr. Tom Buford:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

- A** The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.
- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
- C** The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.
- D** The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.
- E** The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

Sincerely,

Mike Collins

Response 88A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 88B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 88C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a

public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 88D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 88E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 89:Michael Harris (January 13, 2019)

Tom Buford

From: Michael Harris [REDACTED]
Sent: Sunday, January 13, 2019 7:47 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Draft EIR, proposed Del Rio Trail (DRT)

Michael Harris

[REDACTED]

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

Mr. Buford:

I am concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.

A

The DEIR does not address the damage the DRT will do to the integrity of the historic Walnut Grove Branch Line (WGBL). This historic artifact belongs to the people of California and the DRT will prevent it from ever operating again. Further, much of the WGBL will be removed or buried.

B

The DEIR is incomplete without describing rails-with-trails (RWT) as a possible satisfactory solution. California has hundreds of miles of successful RWT; internationally, the world has thousands of miles of RWT. Published studies show that RWT are safe and the best way of combining trails with active rail operations. The next EIR must evaluate a RWT solution and show how it is the most viable solution for the DRT. The RWT solution will provide a win for everyone. The trail is extended and connected to other trails. The SSRR operating franchise is preserved and can continue south. City maintenance requirements are reduced by the SSRR provided maintenance. Longer excursion rides mean more visitors to the City, who are spending more. The reputation of the City as a tourist destination is enhanced.

There is already a template for successful co-existence of rail and trail on the active SSRR right of way, from Old Sacramento to the I-5 Railroad bridge.

C

The DEIR is incomplete with no description of the Sacramento Southern Railroad (SSRR) and the adverse effects of pulling the rails. We must have a means of moving equipment from Old Town in the north to Meadowview in the south.

The DEIR is incomplete without a description of the CSRM and SSRR mission, which is to preserve historic past and interpret present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The DIER is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

The DEIR is inaccurate in that many of the supposed rail issues are either not true or are overstated. Each issue must be accurately stated. Possible mitigation measures must also be fully described.

The City's anti-rail biases are clear in the DEIR. Correct these biases in the next version of the EIR. Include the value of a fully intact WGBL. Include the mitigation value of a rails-with-trails solution.

Sincerely,
Mike Harris

cc: SacRailActionGroup@Gmail.com

Response 89A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 89B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 89C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 89D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 90: Robert Morrison (January 11, 2019)

Tom Buford

From: Robert Morrison [REDACTED]
Sent: Friday, January 11, 2019 10:42 AM
To: Tom Buford
Cc: SacRailActionGroup@gmail.com
Subject: Del Rio Trail Draft EIR

Mr. Tom Buford

I feel that the draft EIR has a bias against rail use by CSRM Sacramento Southern RR on the SSRR/WGBL. Extending operation of the SSRR southward would give passengers a much more pleasant & scenic ride through farm land & river views.

I am a long time Docent at CSRM and meet many visitors asking about the train rides and are disapointed that the ride is so limited in length.

Thank you for your consideration on this issue.

Sincerely,

Bob Morrison

[REDACTED]

Response 90:

This project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway with a Class I multi-use trail in accordance with the City of Sacramento Bikeway Master Plan (a future excursion line is not analyzed within the EIR).

The project will not preclude an excursion train from being proposed along this alignment in the future. The project will preserve the majority of the existing track, including its metal rails, wood ties, and gravel ballast. Track removal is only proposed where necessary for safety reasons, particularly when the skew of the proposed bike path against the existing track would create a safety hazard. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Comment 91: Robert Powell (January 13, 2019)

Tom Buford

From: rplionel <[REDACTED]>
Sent: Sunday, January 13, 2019 7:25 AM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Robert Powell
[REDACTED]

Via Email To: TBuford@CityOfSacramento.Org

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

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

The boilerplate letter below makes some excellent points. For myself, the main point that I would like to emphasize is the potential loss of a continuous rail line from Sacramento to Hood forever. It seems to me that rails and trails can both coexist in this situation. Thank you for your consideration.

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

- A** The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.
- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
- C** The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.
- D** The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual

visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.

E

The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

Sincerely,

Robert Powell

cc: Sacramento Rail Preservation Action Group, SacRailActionGroup@Gmail.com

Response 91A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 91B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here:
http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the

Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 91C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 91D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 91E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 92: Ron Butts (January 13, 2019)

Tom Buford

From: Ron Butts [REDACTED]
Sent: Sunday, January 13, 2019 7:55 PM
To: Tom Buford
Subject: Del Rio Trail Draft EIR (DEIR) (K15165100)

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

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

- A** The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.
- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
- C** The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is

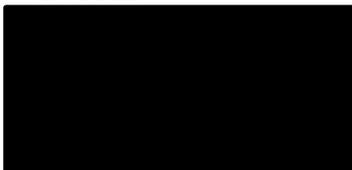
available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR. I would suggest taking the time to read the America's Rails-with-Trails Report (<https://www.railstotrails.org/resource-library/resources/americas-rails-with-trails/>).

D The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.

E The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

I strongly urge that the DEIR be revisited and amended to fix the deficiencies that currently exist in the report.

Sincerely,
Ron Butts



Response 92A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 92B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 92C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a

public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 92D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 92E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 93: Sharon Burke-Polana (January 14, 2019)

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

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

A

The Del Rio Trail DEIR is incomplete and fails address historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) . The rail line is qualified for inclusion in the National Register of Historic Places and must be protected as a historic resource for the people of California according to the requirement of the National Historic Register. The DEIR allows for destruction of this unique artifact. This resource is not adequately addressed in the DEIR.

In addition to being an historic resource, the SSRR/WGBL rail line connects directly to downtown Sacramento at Front Street. It is potentially a needed extension of the existing commuter/recreation rail and trail corridor that is being used currently near the I-5 overpass in the Baths area. The upgrade for the Rail and Trail route would be a very reasonable cost. Bike commuting corridors are very desirable and in high demand and a needed connector safe route for the growing South Sacramento to down town. If it is destroyed, it would be a permanent loss today and for future generations.

B

The DEIR fails to address the solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.

C

The DEIR does not detail the damage that will be done to the Sacramento Southern Railroad's (SSRR) future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.

D

The Report does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the The State Rail Road Museum in Sacramento brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.

The DEIR design proposes a design for separate walking, biking, and running paths when a simple path with a running trail adjacent would meet all needs.. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate pedestrians and cyclist.

Sincerely,

Sharon Burke-Polana, Architect

Response 93A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 93B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 93C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento

Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 93D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 94: Steven Folino (January 10, 2019)

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

Mr. Buford

I'd like to add my voice to the ever-growing list of Sacramento residents that are opposed to the destruction of Sacramento Southern Rail Road's Walnut Grove branch line. This line is a part of California history and should be preserved for all Californians, not converted into a bike trail for a select few.

California needs to encourage tourism to our city, our region and our state. A bike trail will do nothing to accomplish that. But, expanding the Sacramento Southern Rail Road's line will do just that.

Sincerely,

Response 94:

This project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway with a Class I multi-use trail in accordance with the City of Sacramento Bikeway Master Plan (a future excursion line is not analyzed within the EIR).

The project will not preclude an excursion train from being proposed along this alignment in the future. The project will preserve the majority of the existing track, including its metal rails, wood ties, and gravel ballast. Track removal is only proposed where necessary for safety reasons, particularly when the skew of the proposed bike path against the existing track would create a safety hazard. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Comment 95: Vern Gore (January 13, 2019)

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

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

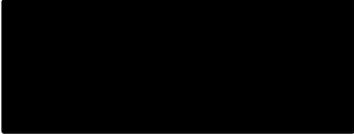
- A** The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.
- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
- C** The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.
- D** The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.
- E** The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail

adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

Sincerely,

Verne Gore

Verne Gore



Response 95A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 95B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here:
http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 95C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 95D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 95E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

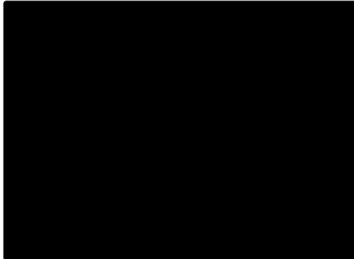
Comment 96: William Johnson (January 12, 2019)

Tom Buford

From: WILLIAM JOHNSON [REDACTED]
Sent: Saturday, January 12, 2019 5:02 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Del Rio Trail Draft DEIR

From:

Bill Johnson



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

Mr. Buford,

I know the following is a "boiler plate" letter, but it states the facts as to why the Sacramento Southern Railroad/Walnut Grove Branch Line needs to be preserved. The long-range dream to have an historic train ride from Old Sacramento (terminus of the Transcontinental Railroad) to the zoo would add great benefits to the city and county. Please consider this in your decision.

Thank you.

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

A

The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.

B

The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.

C

The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.

D

The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.

E

The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

Sincerely,

Bill Johnson

cc: Sacramento Rail Preservation Action Group, SacRailActionGroup@Gmail.com

Response 96A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the

Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 96B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 96C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 96D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 96E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 97: William Taylor (January 12, 2019)

Tom Buford

From: William Taylor [REDACTED]
Sent: Saturday, January 12, 2019 2:42 PM
To: Tom Buford
Cc: Art Fluter, Jay Schenirer
Subject: Del Rio Trail Draft EIR

William Taylor
[REDACTED]

Mr. Buford:

I am concerned that the Draft EIR for the proposed Del Rio Trail contains incorrect information, is incomplete and appears to me to have an anti-rail bias.

A

The draft EIR does not address the damage the trail will do to the integrity of the old Southern Pacific Walnut Grove Branch Line. This historic artifact belongs to the people of California and the proposed trail will prevent it from ever operating again because much of the rail line will be removed or buried. There isn't even a description of the Sacramento Southern Railroad in the DEIR. However, the DEIR does declare that the removal of historic rail has an impact on this historic resource that is disallowed under the NRHP guidelines.

B

I don't understand why there is no proposed rails-with-trails option. California has hundreds of miles of successful rails-with-trails projects. This would work for everybody. The trail would be extended and connected to other trails. The Sacramento Southern Railroad would be preserved and can continue south. Longer excursion rides would bring more visitors to the City, who spend money here.

C

The draft EIR is incomplete without a description of the California State Railroad Museum's and the Sacramento Southern's mission, which is to preserve past and present railroad culture. Part of this mission is to defend the SSRR's operating franchise and historical route for potential future use south to Hood.

D

The draft EIR is incomplete as it does not describe the potential financial losses that will accrue to the CSRM/SSRR. The CSRM/SSRR is a world class tourist attraction with over 300,000 visitors annually from every part of the world. It is the primary tourist anchor for Old Town. Damage to the reputation of the CSRM/SSRR could result in adverse effects to the Old Town tourist economy and City parking and tax revenues.

Also, an incomplete number of Alternatives were looked at. Thus, the selected "Superior Alternative" is an inaccurate conclusion.

The City's anti-rail biases are clear in this document. These biases in the next version of the EIR should be corrected and the DEIR needs to:

Include the value of a fully intact Walnut Grove Branch Line.

Include the mitigation value of a rails-with-trails solution.
Include more Alternatives.

Sincerely,
William Taylor

Response 97A:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 97B:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

Response 97C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 97D:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Comment 98: Larry Boerio (January 13, 2019)

Tom Buford

From: Larry Boerio [REDACTED]
Sent: Sunday, January 13, 2019 5:56 PM
To: Tom Buford
Cc: SacRailActionGroup@Gmail.com
Subject: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

From:
Larry L Boerio
[REDACTED]

Via Email To: TBuford@CityOfSacramento.Org

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

Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Mr. Buford:

I wholeheartedly agree with every aspect of all the significant points which follow the first two paragraphs herein. I would implore you to consider what happens if a decision is made without addressing the issues with the DEIR as tied below. It will lead inevitably to a flawed decision that in all practicality will last forever. One can not simply undo these things. Losing a railroad right-away is a HUGE decision with impact in this case both currently and over the long-term.

In regard to the consequences of such a decision, I would like to suggest that you and the Community Development personnel involved in this decision read the following book: *When the Railroad Leaves Town- American Communities in the Age of Rail Abandonment*. It will provide a multitude of real world examples that I am sure would be most illuminating. The author, Joseph P Schwieterman holds a doctorate in public policy from the University of Chicago and a master's degree in Transportation from Northwestern University. At the time the book was written, he was the director of the Chaddick Institute for Metropolitan Development and professor of public services management at DePaul University. If you or anyone is so interested in reading this, I will be glad to lend my copy. Now to the salient points:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

A

The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.

- B** The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.
- C** The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.
- D** The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.
- E** The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

Sincerely,

Best Regards,

Larry L Boerio

~Not to boast; but to see if we might have common interests ~

MEMBER: Sutter's Fort State Historic Park -Docent; Friends of Sutter's Fort; California State Railroad Museum -Docent; Sacramento Pioneer Association; California Historical Society; California Maps Society; Sacramento Historical Society; SacramentoHistory Museum; Sacramento Book Collectors Club; Preservation Sacramento; Renaissance Society -Sacramento; Oregon California Trails Association (OCTA) - Cal/NV & Southern Trails Chapters, Trails West; Old Spanish Trail Association; Mojave River Valley Museum & Desert Explorers; Westerners International - Los Angeles Corral, & Utah Westerners; Santa Fe Railway Historical & Modeling Society; Railway & Locomotive Historical Society - Pacific Coast Chapter; National Association of Railroad Passengers; Sierra Club.

"Study the Past if you would define the Future "- Confucius

So what part of "Choo- Choo" don't you understand?

Response 98A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic

Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 98B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 98C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 98D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General

Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 98E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.

Comment 99: Lisa Lisonbee (January 13, 2019)

Tom Buford

From: Lisa Lisonbee <[REDACTED]>
Sent: Sunday, January 13, 2019 11:07 PM
To: Tom Buford
Cc: sacrailactiongroup@gmail.com
Subject: DEIR

Dear Mr. Buford,

I am concerned about the Del Rio Trail draft environmental impact report and how it affects the railroad. I've lived in the area for almost forty years and know that one of the most unique things about Sacramento is its connection with rail. I've brought visitors to experience this price of history and appreciated their excitement at what I may have taken for granted over the years. I really want to see the SSRR/WGBL be protected and not limited! I hope you will see the value of granting it continued and further scope and realize the problems with the DEIR.

Thank you,
Lisa Lisonbee

[REDACTED]

Response 99:

This project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway with a Class I multi-use trail in accordance with the City of Sacramento Bikeway Master Plan (a future excursion line is not analyzed within the EIR).

The project will not preclude an excursion train from being proposed along this alignment in the future. The project will preserve the majority of the existing track, including its metal rails, wood ties, and gravel ballast. Track removal is only proposed where necessary for safety reasons, particularly when the skew of the proposed bike path against the existing track would create a safety hazard. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Comment 100: Marcia Johnston (January 11, 2019)

January 11, 2019

Mr. Tom Buford
Manager – Environmental Planning Services
City of Sacramento - Community Development Department
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Re: Del Rio Trail EIR [DEIR – K 15165100] – Sacramento Southern, Walnut Grove Branch

Dear Mr. Buford,

It has come to my attention re: the above-mentioned EIR [DEIR report and my concerns with it to wit:

- A** • The DEIR impacts a known historical artifact totaling ignoring the rail/trail solutions. It does not document the potential Sacramento economic development provided by a heritage excursion railroad.
- B** • The impact and damage to the Sacramento Southern Railroad/Walnut Grove Branch line is not accurately described, as this branch qualifies for the National Register of Historic Places with its protections in place. We feel that this unique artifact will be destroyed at the direction of a few residents.
- C** • The DEIR does not detail all the damage that will be done as to the future operating franchise which allows us to run these trains to Hood, California. To sever the rails along the former SacRT corridor eliminates the recovering of rolling stock to the railyard and the former Southern Pacific Shops.
 - I feel the DEIR has an anti-rail bias in that the Rails to Trails is safe and used throughout the U.S. and around the world. Multiple surveys, design and analysis documents some of which were created by USDOT are available, yet none of these documents were cited or referenced in the DEIR.
 - There appears that there is an economic disservice to the people of Sacramento none of which appears in the DEIR. By severing the north and south portion of the SSRR rails, it destroys the potential tourism for heritage rail excursions.
 - The California Railroad Museum receives over 300,000 annual visitors with SSRR 20,000 riders and another 25,000 riders due to the Holiday Polar Express. The DEIR must address investing in heritage railroads and excursion services for economic development.
- D** • The DEIR does not address the unnecessary expense and what appears to be wasteful spending for walking, biking and running paths when a simple asphalt path adjacent to the rails would certainly be sufficient. The rail-with-trail would be cheaper, faster and would accommodate all types.

Please take our concerns into consideration.

Sincerely,

Marcia Johnston
Member of California Railroad Museum

Response 100A:

As stated in the project purpose and need, the goal of this undertaking is to construct a multi-use trail, consistent with the City's Bicycle Master Plan. Attracting tourists and generating revenue/economic benefit is not a project goal and is therefore not discussed in detail in this EIR.

Response 100B:

The proposed Build Alternative has been developed to minimize impacts to the historic railroad to the greatest extent feasible. Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 100C:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The proposed project would construct and operate a 4.8-mile Class I multi-use path. An excursion rail is not a project component; therefore, analysis of a rail project, and any supporting documentation or economic analysis for a rail project, is not included within the EIR impact analysis. The trail project is not associated with any future excursion train, as the project's purpose and need is to advance and complete the planned bike path connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan. The EIR did not include a potential trail/excursion rail alternative because the excursion rail portion would not assist in meeting any of the project objectives.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

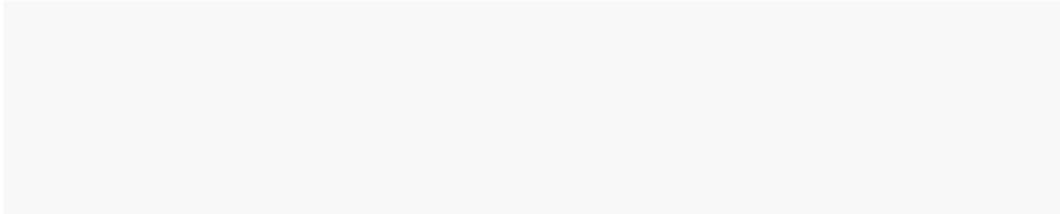
Response 100D:

Throughout the preliminary planning process, the City of Sacramento has considered numerous design alternatives for the proposed Build Alternative. These alternatives were identified through extensive public outreach with the local community and stakeholders (see EIR Section 1.8). Ultimately the project description for the Build Alternative in the EIR incorporates changes proposed by public comments to minimize impacts to the historic railroad whenever feasible. However, the City of Sacramento does not currently plan for an excursion train to operate in the project area, so a Rail-only or Rail-with-Trail option is not considered a practical alternative.

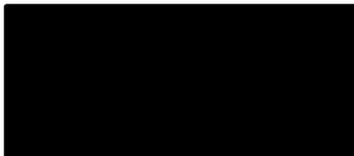
Comment 101: Matthew Lisonbee (January 14, 2019)

Tom Buford

From: Matthew Lisonbee [REDACTED]
Sent: Monday, January 14, 2019 6:11 AM
To: Tom Buford
Cc: sacrailactiongroup@gmail.com
Subject: Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)



Matt Lisonbee



Mr. Buford:

The Del Rio Trail DEIR is wrong and incomplete. It must be rewritten. The DEIR damages a known historical artifact, and totally misses internationally used rail/trail solutions. Finally, the DEIR also does not document the potential Sacramento economic development that would be provided by a longer world class heritage excursion railroad.

The DEIR is defective due to the following issues:

A

The impact and damage to the historic Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) is not accurately described. The SSRR/WGBL qualified for inclusion in the National Register of Historic Places and

must be protected. The SSRR/WGBL belongs to all Californians. The DEIR destroys this unique artifact at the behest of a few residents.

B

The DEIR does not detail the damage that will be done to the SSRRs future operating franchise. This franchise allows us to eventually run trains further south, eventually to Hood. Severing the rails along the former RT corridor eliminates the possibility forever of recovering rolling stock to the railyards and the former SP Shops.

C

The DEIR is clearly has an anti-rail bias in that a known solution of rails-with-trails is available, is safe, and is used in hundreds of miles of rail/trail across the U.S. and around the world. Multiple survey, design, and analysis documents, some created by the USDOT, are available, yet none were cited or referenced in the DEIR.

D

The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California and none of this economic analysis appears in the DEIR. By severing the north and south portion of the SSRR rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the Museum brings in over 300,000 annual visitors, and the SSRR 20,000 summer riders and another 25,000 holiday riders. An expanded and longer excursion service would increase area visitors and their spending on local amenities and supplies. The DEIR must document how other cities are investing in heritage railroads and excursion services and using this to drive economic development in their area and explain why Sacramento is turning its back on this approach.

E

The DEIR design also spends too much money on unnecessary and wasteful designs for separate walking, biking, and running paths when a simple asphalt path with a running trail adjacent would meet all needs. For example, use the simple SSRR rail-with-trail approach in the Baths area near the I-5 bridge. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, faster, and accommodate all types of pedestrians.

Sincerely,

Matt Lisonbee

cc: Sacramento Rail Preservation Action Group, SacRailActionGroup@Gmail.com

Response 101A:

Thank you for your comment. The City's discloses all potential impacts to the legally abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR). Due to the limited impacts to the railroad, in which track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided, the project was determined to have a Finding of No Adverse Effect with Standard Conditions for impacts to the Walnut Grove Branch Line of the Southern Pacific Railroad through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. This determination was made pursuant to 36 CFR 800.5(c) and Section 106 Programmatic Agreement Stipulation X.B(1) between the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and The California Department Of Transportation.

Response 101B:

The City acknowledges that there was an approved Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood (1991); however, the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068) is the current planning document for planned uses of the historic rail corridor. The latter document identifies an extension of the existing excursion train from Old Sacramento to the Sacramento Zoo (at Sutterville Road) as well as a new excursion train line which could run from the Pocket Road/Meadowview Road neighborhood to the town of Hood. The plan and 2014 FEIR specifically exclude the segment of the planned extension of the excursion rail between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21). As a result, the City of Sacramento has determined that the proposed multi-use trail would not interfere with the approved land use within that segment of the corridor or the planned extension of the excursion rail.

Old Sacramento State Historic Park General Plan and 2014 FEIR is available here: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

The Del Rio Trail project is independent of any future proposal for an excursion train, as the project's purpose and need is to advance and complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento Bikeway Master Plan.

The project would not preclude operation of an excursion train along the trail alignment in the future. Any such excursion rail proposal would be required to conduct appropriate environmental review.

Response 101C:

The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including the South Land Park Neighborhood Association (SLPNA), Land Park Community Association (LPCA), California State Parks, Sacramento Regional Transit, and the Railroad Foundation. Following award of the ATP Cycle 2 Grant in 2015, the City designed a public outreach program to share information and obtain feedback to better define the proposed Project. A total of 17 public outreach meetings have been held with stakeholders between 2015 and 2018 prior to circulation of the EIR to assist the City in making decisions regarding the project. Please see Section 1.6 of the EIR for detailed description of all public outreach efforts. Following these meetings, the feedback received has been assessed in light of the project's purpose and need and adjustments have been made to the project design accordingly.

Response 101D:

The segmented, abandoned rail within the proposed project area does not support an active operational excursion train and has not been approved for this use (State Historic Park General Plan and FEIR, June 2014, SCH: 20100092068, Chapter 4, Page 4-21); therefore, the project area is not considered an existing rail transportation corridor and is not evaluated as such within the

EIR. As noted, the proposed trail would not prevent resumption of use of the rail facility if such use were proposed and pursued with the necessary studies and environmental review.

Response 101E:

To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the document.