Del Rio Trail Project



Final Environmental Impact Report

Federal Project No.: ATPL-5002(189)

Submitted to:



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EXECUTIVE SUMMARY

The City of Sacramento (City) proposes to construct approximately 4.8 miles of Class I multi-use trail along the abandoned railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road as part of the Del Rio Trail Project (proposed Project). The California Environmental Quality Act (CEQA) requires public agencies to identify, disclose, and consider the potential environmental impacts of proposed discretionary actions that an agency is considering for approval.

This Final Environmental Impact Report (EIR) contains the public and agency comments received during the public review period for the Del Rio Trail Draft EIR, and responses to each of those comments. The EIR is an informational document intended to disclose to the City of Sacramento (City) and the public the environmental consequences of approving and implementing the Del Rio Trail Project (Build Alternative or proposed Project) or one of the alternatives to the project described in the Draft EIR. All written comments received during the public review period (November 5, 2018, through January 3, 2019) on the Draft EIR are addressed in this Final EIR. The responses in the Final EIR clarify, correct, and/or amplify text in the Draft EIR, as appropriate. Also included are text changes made at the initiative of the Lead Agency (City of Sacramento). These changes do not alter the conclusions of the Draft EIR. This document has been prepared in accordance with the California Environmental Quality Act (CEQA; California Public Resources Code (PRC), Sections 21000–21177).

BACKGROUND

In accordance with CEQA, the City released a Notice of Preparation (NOP) on June 8, 2018. The purpose of the NOP was to provide notification that an EIR for the project was being prepared and to solicit guidance on the scope and content of the document. Prior to release of the NOP, the project applicant held 14 public outreach meetings to hear concerns raised by interested stakeholders. The Draft EIR was circulated for public review and comment for a period of 59 days from November 1, 2018, through January 3, 2019. The comments and responses that make up the Final EIR, in combination with the Draft EIR, as amended by the text changes, constitute the EIR that will be considered for certification by the decision makers of the City of Sacramento.

CEQA REQUIREMENTS

Under CEQA, the Lead Agency must prepare and certify a Final Environmental Impact Report (Final EIR) prior to approving a proposed project. The contents of a Final EIR are specified in Section 15132 of the CEQA Guidelines, which states that the Final EIR shall consist of:

- a) The Draft EIR or a revision of the Draft.
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d)The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency. The Lead Agency must provide each agency that commented on the Draft EIR with a copy of the Lead Agency's response to such comments a minimum of 10-days before certifying the Final EIR.

USE OF THE FINAL EIR

The Final EIR allows the public and the City an opportunity to review revisions to the Draft EIR and the Responses to Comments. The Final EIR serves as the environmental document to inform the City Council's consideration of the proposed project, either in whole or in part, or one of the alternatives to the project discussed in the Draft EIR. As required by Section 15090 (a) (1)-(3) of the CEQA Guidelines, a Lead Agency, in certifying a Final EIR, must make the following three determinations:

- 1. The Final EIR has been completed in compliance with CEQA.
- 2. The Final EIR was presented to the decision-making body of the Lead Agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.
- 3. The Final EIR reflects the Lead Agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

- 1. Changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when a Lead Agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing the reasons supporting the action. The Statement of Overriding Considerations shall be supported by substantial evidence in the Lead Agency's administrative record. Here, however, because the proposed project would not result in significant and unavoidable impacts (assuming the City Council finds all proposed mitigation measures to be feasible), the City Council would not be required to adopt a Statement of Overriding Considerations if it approves the proposed project (See also Public Resources Code Section 21081). The Findings of Fact are included in a separate document that will be considered for adoption by the City's decision makers at the time of project approval.

SUMMARY OF TEXT CHANGES

The following Final EIR identifies all changes made to the Draft EIR. Changes are noted using a black line in the left margin. These text changes provide additional clarity in response to comments received on the Draft EIR as well as provide revisions to the project made by the project applicant, but do not change the significance of the conclusions presented in the Draft EIR.

RESPONSES TO COMMENTS

A list of public agencies and individuals commenting on the Draft EIR is provided in Appendix L in this Fin

al EIR. A total of 101 comment letters were received and each letter and response is included in Appendix L. Each response is numbered and presented with brackets indicating how the letter has been divided into individual comments. Each comment is given a binomial with the number of the comment letter appearing first, followed by the comment letter. For example, comments in Letter 1 are numbered 1-A, 1-B, 1-C, and so on. Immediately following the letters are the responses, each with binomials that correspond to the bracketed comments.

INTRODUCTION

The City of Sacramento (City) proposes to construct approximately 4.8 miles of Class I multi-use trail along the abandoned railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road as part of the Del Rio Trail Project (proposed Project). The California Environmental Quality Act (CEQA) requires public agencies to identify, disclose, and consider the potential environmental impacts of proposed discretionary actions that an agency is considering for approval. A Project that may have a significant impact on the environment cannot be approved unless the Lead Agency makes the approval contingent upon the implementation of mitigation measures that would reduce or avoid that impact to the extent feasible. When a Project may have significant environmental impacts, the Lead Agency must prepare an environmental impact report (EIR) before it considers whether to approve the Project.

PROJECT PURPOSE AND NEED

The purpose of the Del Rio Trail Project 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 utilizing public right-of-way and public agency parcels;
- Connect logical origins and destinations proximate to the trail alignment by improving pedestrian and bicycle access throughout the South Land Park, Freeport Manor, Z'berg Park, Land Park, Meadowview, and Pocket communities; and
- Provide an American's with Disabilities Act (ADA)-compliant, active transportation connection to adjacent communities throughout the south Sacramento area for pedestrians and bicyclists of all ages and abilities to access schools, retail, jobs, and recreational amenities.

The Del Rio Trail Project is needed because the South Land Park, Pocket, and adjacent communities in South Sacramento currently have limited ADA-compliant, active modes of transportation to schools, retail, jobs, and recreational amenities, thereby increasing automotive dependency and Vehicle Miles Traveled while reducing opportunities for those who do not drive or do not have access to a car, including children, the elderly, the disadvantaged, and persons with disabilities.

PROPOSED ALTERNATIVES

The focus and definition of the alternatives evaluated in this EIR are governed by the "rule of reason," in accordance with section 15126.6(f) of the CEQA Guidelines. That is, the range of alternatives presented in this EIR must permit a reasoned choice by the City of Sacramento (City). The CEQA Guidelines (section 15126.6) require that an EIR evaluate at least one "No-Project Alternative," evaluate a reasonable range of alternatives to the project, identify alternatives that were considered during the scoping process but were eliminated from detailed consideration, and identify the "environmentally superior alternative."

Proposed Project (Build Alternative)

The proposed Del Rio Trail Project consists of a Class I multi-use trail (12 to 16 feet of pavement with unpaved shoulders ranging from 2 to 3 feet). The Del Rio Trail would include at-grade crossings and intersection modifications at each location where the trail intersects a vehicular roadway (see Figures 1 through 3).

The Build Alternative begins approximately 0.4 mile south of Pocket Road near the Freeport Water Tower adjacent to the Interstate-5 (I-5) bridge over Freeport Boulevard and extends approximately 4.8 miles north along the abandoned railway corridor within the City of Sacramento. At the southern entry, the bike trail would connect directly to the newly constructed Freeport Shores Trail and the South Sacramento

Parkway West. The route would then cross at Meadowview-Pocket Road and continue north through the South Land Park neighborhood towards William Land Park and the Sacramento River Parkway. North of Sutterville Road, the trail connects to the Sacramento River Parkway via two alignments: west along Sutterville Road with Class II bike lanes and northwest adjacent to the existing abandoned railway corridor.

Permanent right-of-way acquisitions and temporary construction easements are needed where the trail passes through Sacramento Regional Transit and State-owned parcels along the trail.

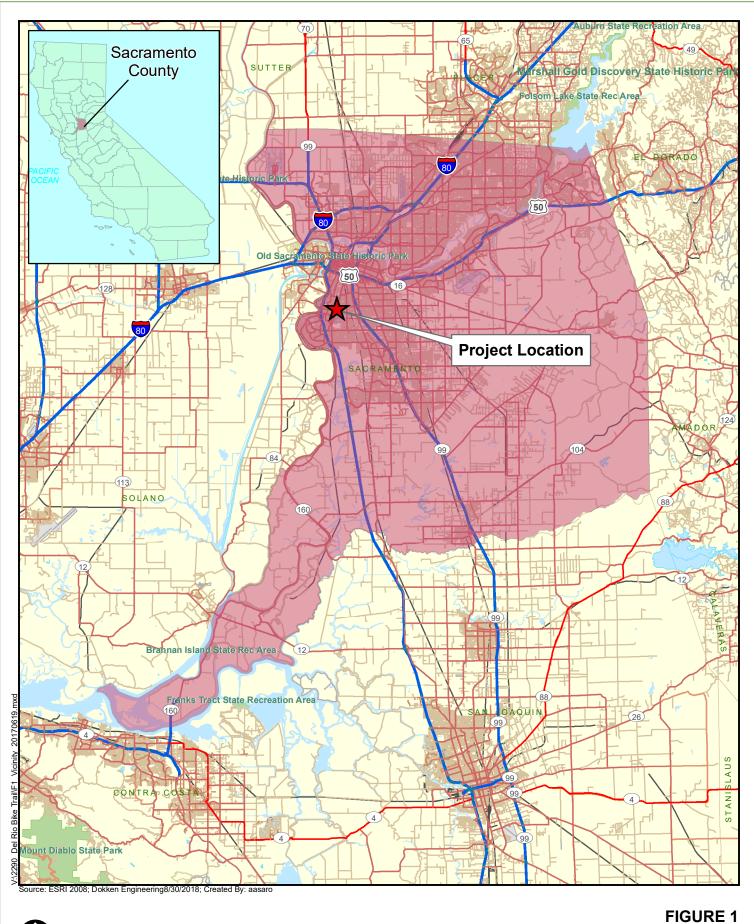
This Project is Federally funded through the Active Transportation Program (ATP) grant and, therefore, requires compliance with the National Environmental Policy Act (NEPA) in addition to CEQA. The Lead Agency for CEQA compliance is the City; the Federal Lead Agency for NEPA compliance is the California Department of Transportation (Caltrans).

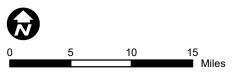
No Project Alternative

The No Project Alternative should also be considered the "do nothing" alternative. No construction would occur in the project area and the City would discontinue efforts to advance this project. Under the No-Project Alternative, the City would not accomplish the following objectives:

- 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 utilizing public right of way and public agency parcels.
- Connect logical origins and destinations proximate to the trail alignment by improving pedestrian and bicycle access throughout the South Land Park, Freeport Manor, Z'berg, Land Park, Meadowview, and Pocket communities; or
- Provide an American's with Disabilities Act (ADA)-compliant, active transportation connection to adjacent communities throughout the south Sacramento area for pedestrians and bicyclists of all ages and abilities to access schools, retail, jobs, and recreational amenities.

The South Land Park, Pocket, and adjacent communities in South Sacramento would continue to have limited ADA-compliant, active modes of transportation to schools, retail, jobs, and recreational amenities thereby increasing automotive dependency and Vehicle Miles Traveled. There would also continue to be reduced opportunities for those who do not drive or do not have access to a car including children, the elderly, the disadvantaged, and persons with disabilities.





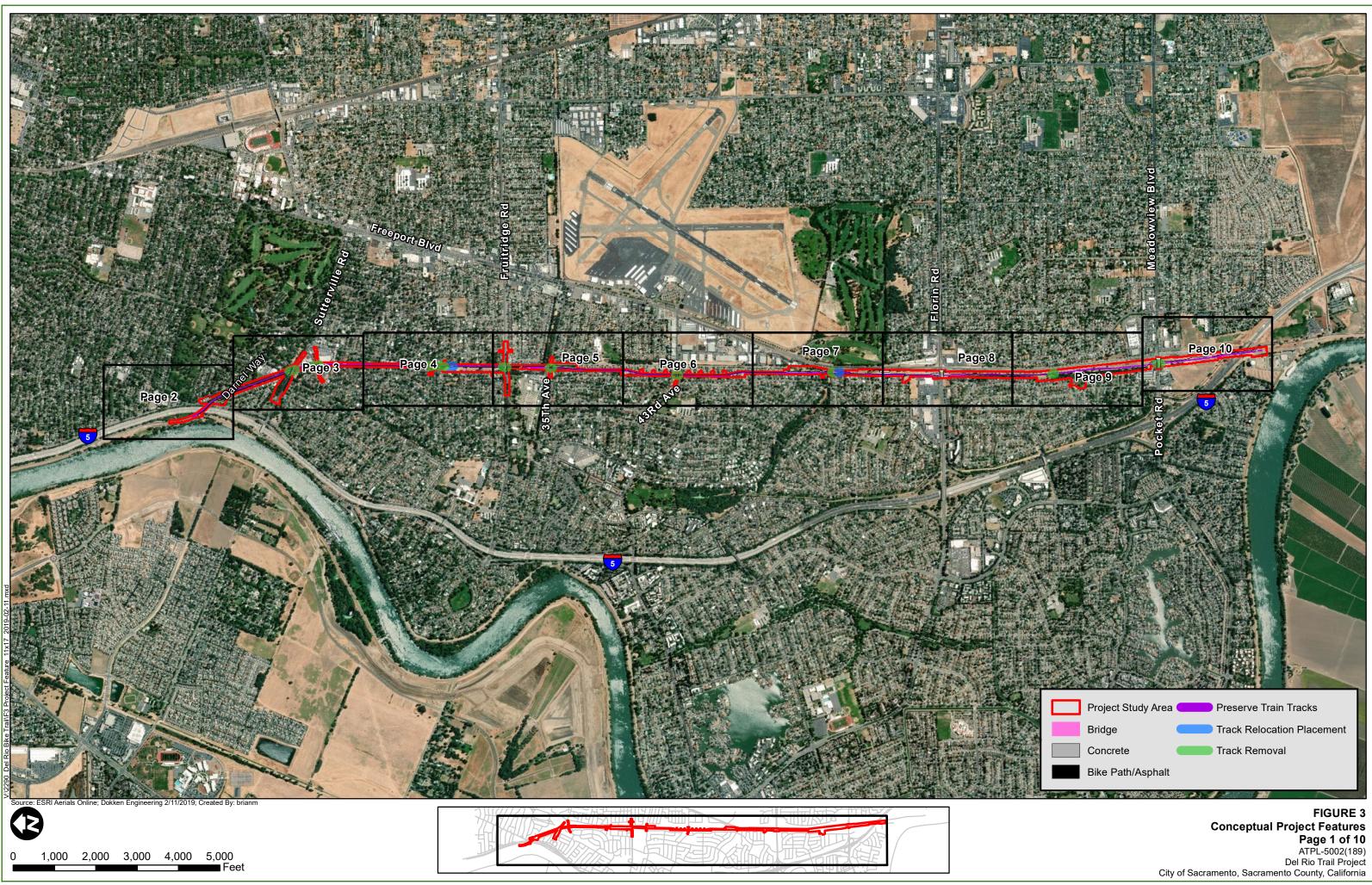
Project Vicinity ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

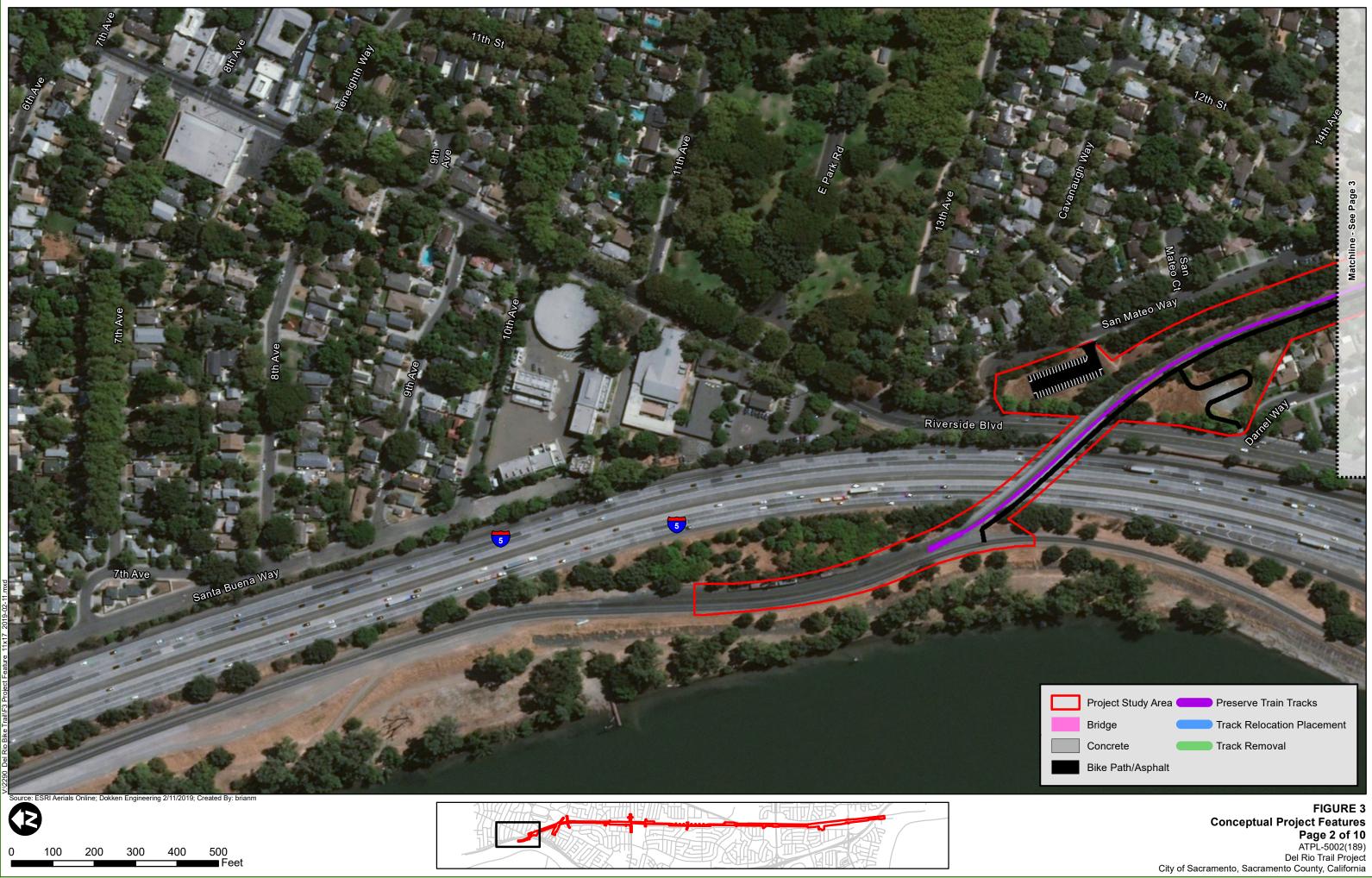


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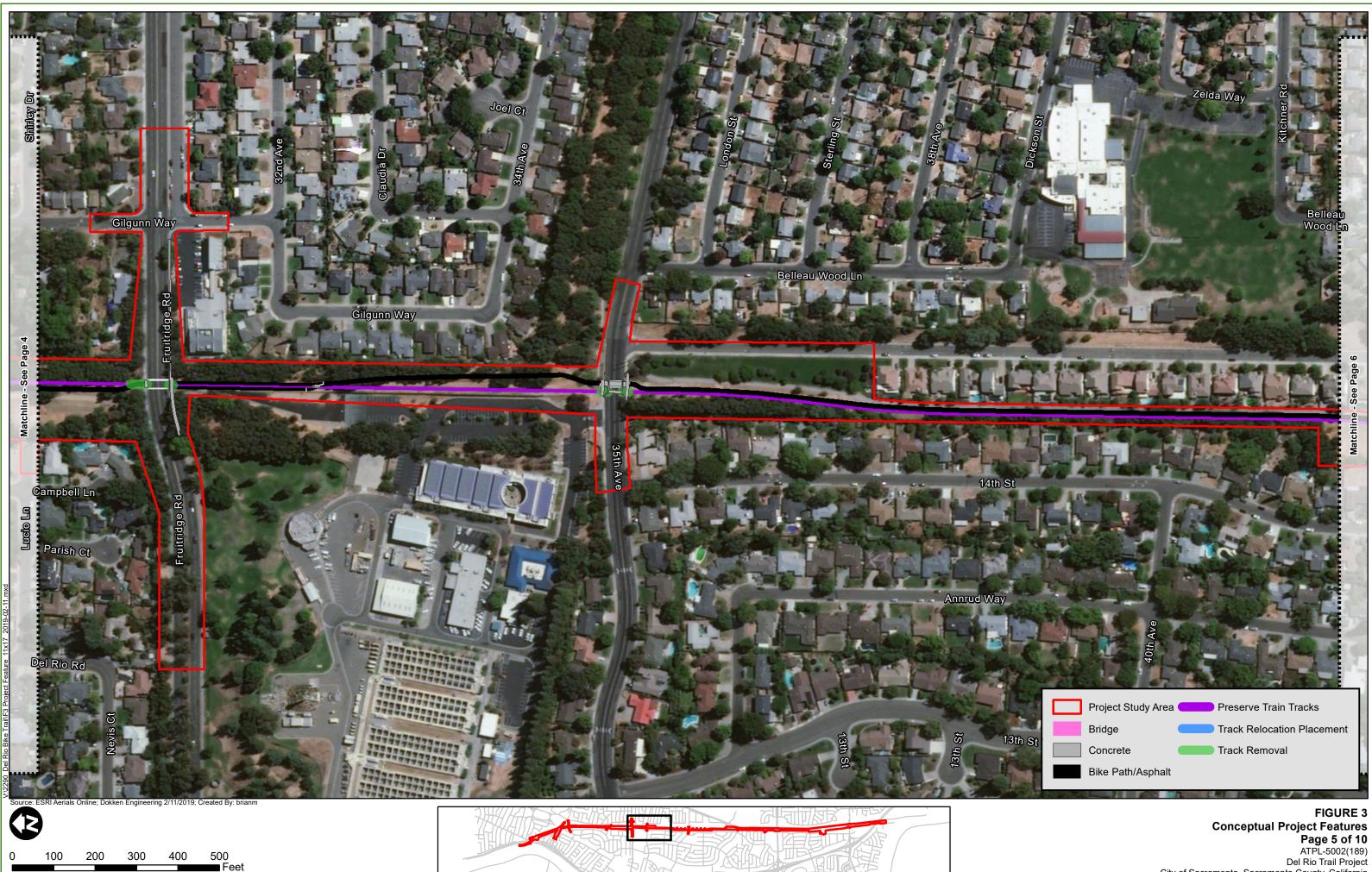
FIGURE 2 Project Location ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

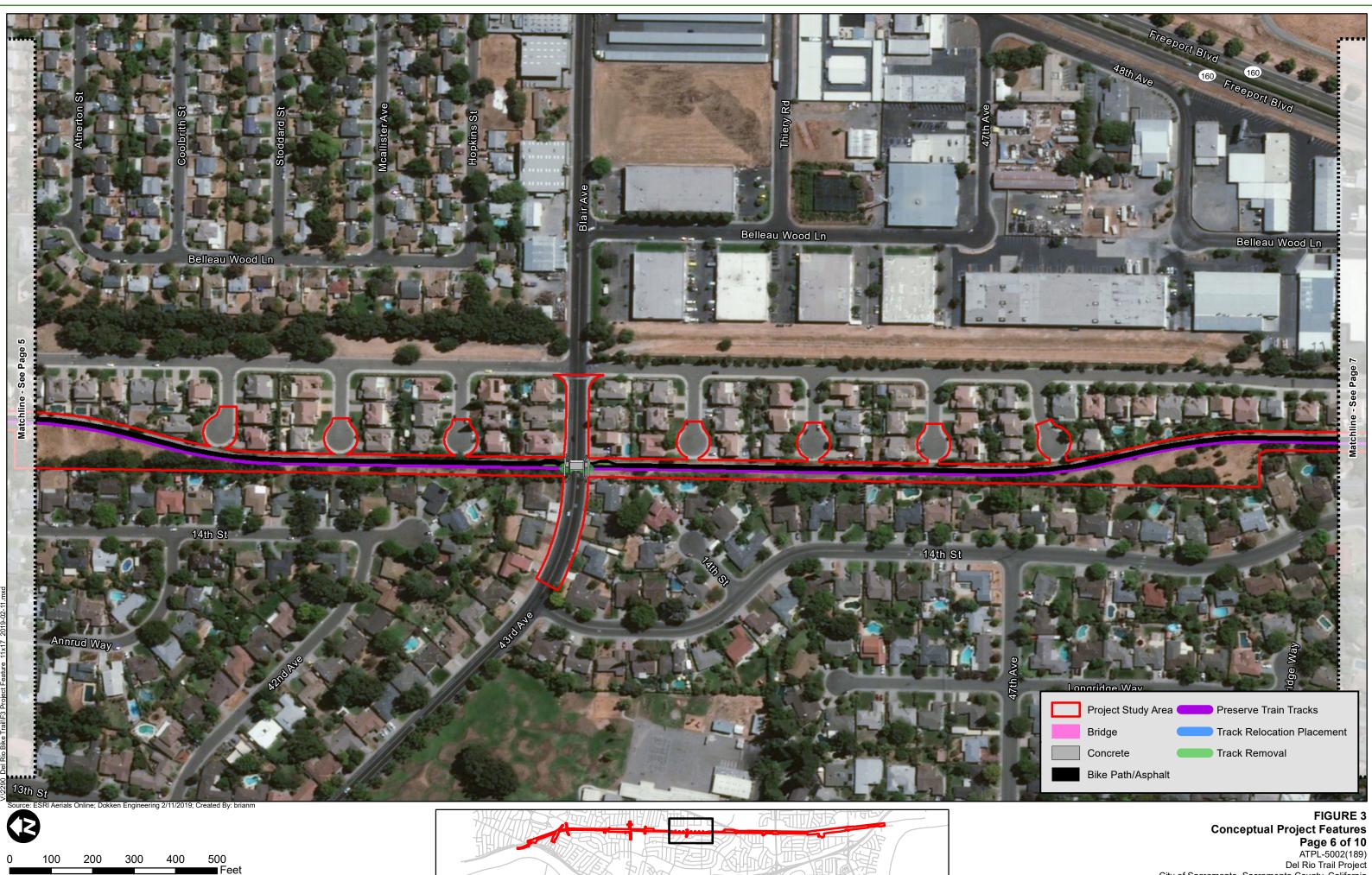




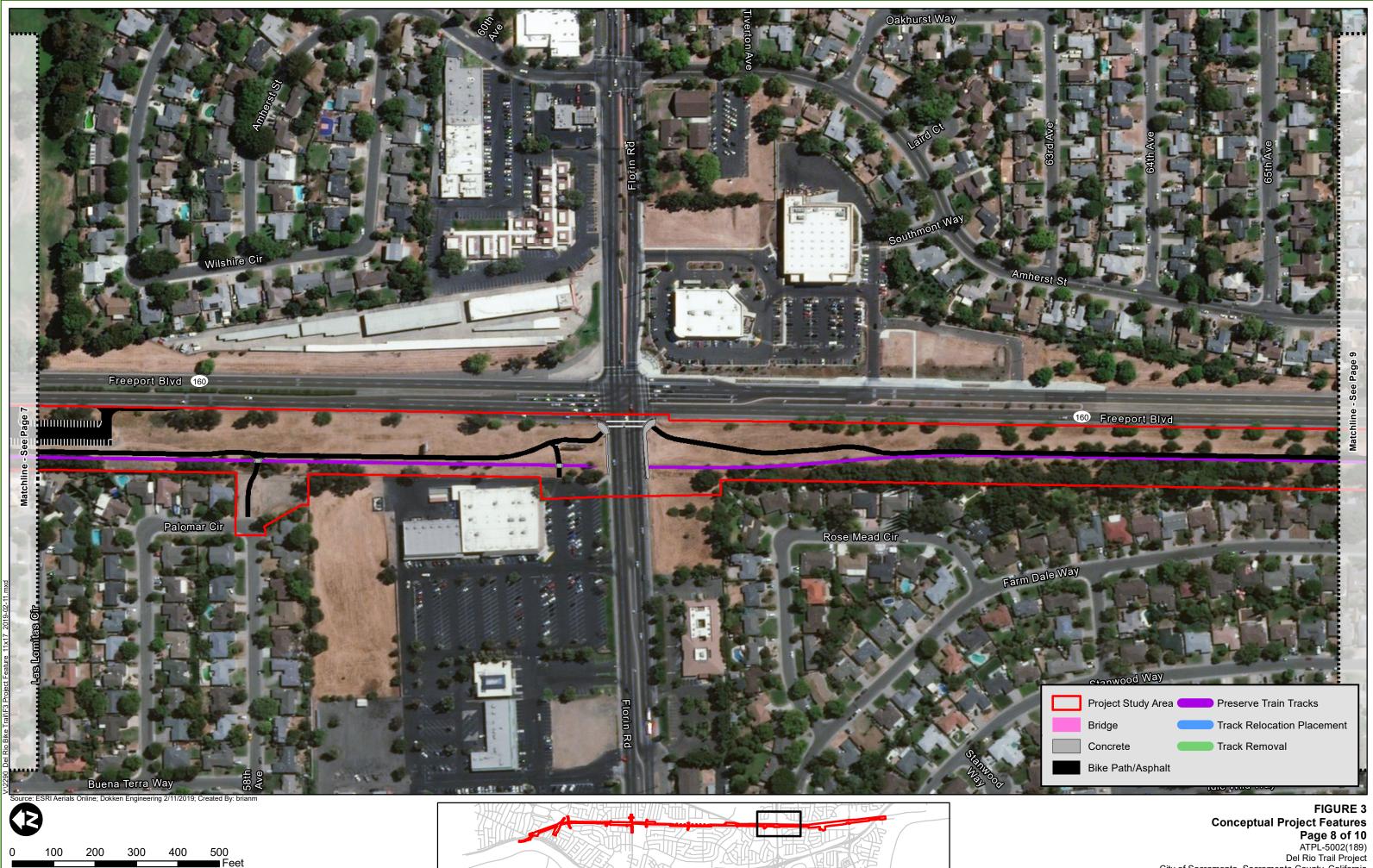




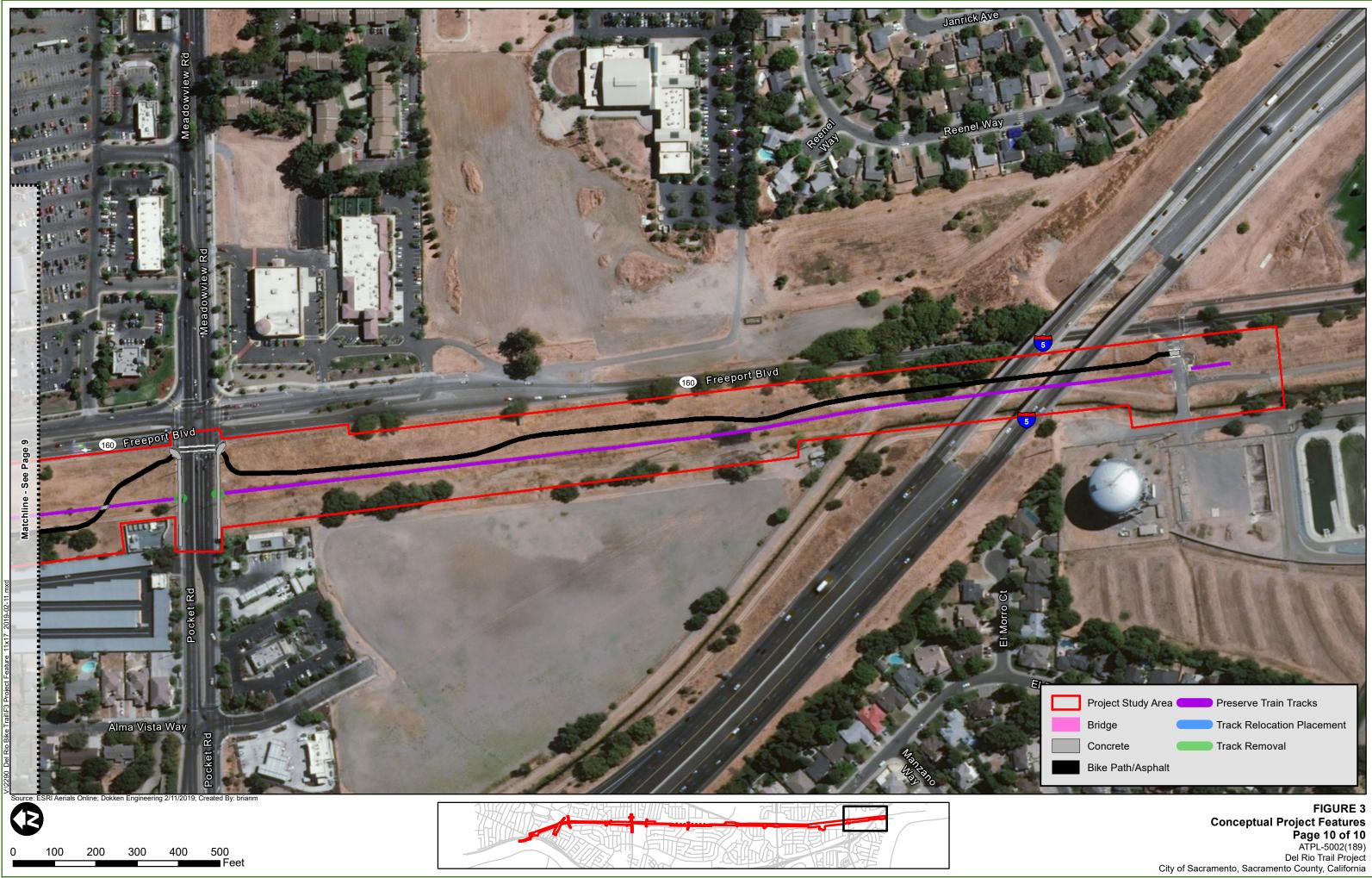












PROJECT DETAILS

The proposed Del Rio Trail Project consists of a Class I multi-use trail (12 to 16 feet of pavement with unpaved shoulders ranging from 2 to 3 feet). The Del Rio Trail would include at-grade crossings and intersection modifications at each location where the trail intersects a vehicular roadway. Other components of the proposed Project include providing access points at various locations along the trail, as well as landscape and hardscape improvements. Construction staging would occur within existing City right of way along the corridor. No private right of way acquisition would occur.

Anticipated Construction Equipment

Typical construction equipment would include the following:

- Backhoe
- Excavator
- Concrete saw
- Concrete hammers
- Cement truck
- Paver
- Rollers
- Motor grader
- Dump truck
- Light hand tools

Most construction-related noise would occur during the multi-use trail construction. This operation would likely include noise from concrete hammers and excavators. All construction work would comply with the City of Sacramento Standard Construction Specifications (or Best Management Practices [BMPs]). Construction is anticipated to last less than twelve months.

AGENCY ROLES AND RESPONSIBILITIES

The City is the Lead Agency, as defined by CEQA, for this EIR, and has the principal responsibility to ensure that the requirements of CEQA have been met. After the EIR public review process is complete, the City Council is the party responsible for certifying that the EIR adequately evaluates the environmental impacts of the proposed Project. The City Council has the authority to approve the Build Alternative, approve the Build Alternative with modifications, or select the No Build Alternative.

Permits

The permits, reviews, and approvals listed below would be required for Project construction.

Responsible Agency	Permit/Approval	Status	
Regional Water Quality Control Board	National Pollutant Discharge Elimination System 402 Construction General Permit	Prior to construction.	
Central Valley Flood Protection Board	Encroachment Permit	Prior to construction.	
Department of Water Resources Maintenance Area 9	Encroachment Permit	Prior to construction.	
Sacramento Area Flood Control Agency	Construction timing coordination.	Prior to construction.	
California Department of Fish and Wildlife	Section 1602 Streambed Alteration Agreement	Prior to Construction	
U.S. Army Corps of Engineers	Section 408 Permit	Prior to construction.	
City of Sacramento	Protected Tree Removal Permit.	Prior to construction.	

Required Permits and Approvals

Coordination Efforts:

The proposed Project currently falls under the Sacramento County (County) area-wide municipal separate storm sewer system (MS4) permit to discharge stormwater runoff from storm drains within County jurisdiction; however, since the proposed Project area exceeds 1 acre, a National Pollutant Discharge Elimination System (NPDES) 402 General Permit for Storm Water Discharges associated with construction activity will also be obtained prior to construction.

The proposed Project is located along the Sacramento River levee within the 100-year floodplain. Coordination with Central Valley Flood Protection Board (CVFPB), Department of Water Resource Maintenance Area 9 (MA-9), U.S. Army Corps of Engineers (USACE), California Department of Fish and Game, and Sacramento Area Flood Control Agency (SAFCA) will be required prior to construction.

AREAS OF CONTROVERSY

The City issued a Notice of Preparation (NOP) for the Draft EIR on June 8, 2018 in compliance with CEQA and the State CEQA Guidelines (see Appendix C of this EIR). The City provided the NOP to local, State, and Federal agencies, organizations, and individuals that requested receipt of the City's public notices. The NOP was circulated for comment for 30 days, ending on July 9, 2018.

During the NOP comment period, the public and various government agencies have identified areas of controversy that pertain to the proposed Project. General topics raised included: biological resources, water quality, recreation, visual resources, noise, traffic, cultural, archeological, and Native American resources, as well as general permitting concerns. Specific topics raised included:

- Impacts to the Historic Walnut Grove Branch Line of the Southern Pacific Railroad;
- Right of Way;
- Tree Removal; and
- Consideration of Project Alternatives.

ISSUES TO BE RESOLVED

The discussion of environmental impacts, mitigation measures, and Project alternatives as evaluated in detail in this EIR constitutes the identification of issues to be resolved as required for compliance with CEQA Guidelines Section 15123(b)(2). In addition, a summary of Environmental Impacts and Mitigation Measures is provided in below on Page xxviii.

FINAL EIR

The Final EIR will be considered by the City Council when acting on the proposed Project. If the Project is approved, CEQA requires the City to adopt findings describing how each of the significant impacts identified in the EIR is being mitigated. The findings will also describe the reasons why Project alternatives that were analyzed in the EIR have not been adopted if the City Council chooses not to adopt a Project alternative. Finally, the City will adopt a Mitigation Monitoring and Reporting Plan (MMRP) that describes how it will ensure the mitigation measures being required of the Project will be carried out. The MMRP is included as an attachment to this EIR as Appendix B.

SUMMARY OF POTENTIAL IMPACTS AND PROPOSED MITIGATION

CEQA requires that the environmental analysis contained in the EIR also include a summary of the Project and its consequences, including an identification of each potentially significant effect of the Build Alternative, the level of effect the Build Alternative may have, as well as any proposed mitigation measures. A full discussion of each of the proposed mitigation measures is found in Chapter 2.0. The table below provides a summary of the potential impacts of the proposed Project.

Summary	/ of Major	Potential Im	pacts from	Alternatives
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Potential Impact	Build Alternative	No-Build Alternative
Visual/Aesthetics	The Build Alternative would have potential changes in visual quality through the removal of trees but would not significantly impact the visual character of the Project area. <u>Mitigation measures would ensure impacts are less than significant.</u>	<u>No impact.</u>
Air Quality and Climate Change (Construction)	Construction impacts to air quality are short-term in duration and, therefore, would not result in adverse or long-term conditions. <u>Air quality impacts would be</u> <u>less than significant.</u> The Build Alternative would result in minor increases in GHG emissions during construction; however, <u>these impacts are</u> <u>short-term and would not result in a</u> <u>significant increase in regional GHG.</u>	<u>No impact.</u>
Natural Communities	The Build Alternative would result in temporary impacts to riparian habitat; therefore, a Section 1602 Streambed Alteration Agreement would also be acquired from the CDFW. <u>Mitigation measures would be implemented to reduce impacts to a less than significant level.</u>	<u>No impact.</u>
Wetlands and other Waters	The Build Alternative would result in temporary impacts to waters of the U.S. and State. The City will coordinate with the U.S. Army Corps of Engineers and Regional Water Quality Control Board to ensure appropriate <u>mitigation measures</u> are implemented which would reduce these impacts to a less than significant <u>level</u> .	<u>No impact.</u>
Plant Communities	No special status plant species have been identified within the Build Alternative area. Impacts to plant communities would be less than significant.	<u>No impact.</u>
Animal Communities	No special status animal species have been identified within the Build Alternative area. <u>Impacts to animal communities</u> would be less than significant.	<u>No impact.</u>

Potential Impact	Build Alternative	No-Build Alternative
Threatened and Endangered Species	The Build Alternative would not result in impacts to State or Federal threatened or endangered species. <u>Minimization and mitigation measures would be implemented to reduce potentially significant impacts to a less than significant level.</u>	<u>No impact.</u>
Historic Resources	The Build Alternative would result in the removal of segments of the historic Walnut Grove Branch Line of the Southern Pacific Railroad, which is eligible for inclusion in the National Register of Historic Places. Caltrans CSO, as designated by the State Historic Preservation Office, concurred on October 23, 2018 that the track removal is not considered an adverse effect. Minimization and mitigation measures would be implemented to reduce potentially significant impacts to a less than significant level.	<u>No impact.</u>
Land Use	The Build Alternative would meet the goals of the City of Sacramento General Plan and the City Bikeway Master Plan. No impacts to land use are expected.	The No-Build Alternative would conflict with the 2018 City of Sacramento Bicycle Master Plan. <u>Less</u> <u>than significant impact.</u>
Archaeological Resources	The Build Alternative is not expected to encounter any archaeological resources during Project construction. If resources are discovered, construction will stop until a qualified cultural specialist can determine how to protect the sensitive resources. Impacts to archaeological resources are expected to be less than significant.	<u>No impact.</u>
Population Growth	The Build Alternative would not result in the acquisition of private property or stimulate population growth, other than what was planned for in the 2035 General Plan. <u>No impacts due to population</u> growth are expected.	<u>No impact.</u>
Utilities/Public Services	The Build Alternative would require utility coordination for water, sewer, electric, telephone/cable, and gas prior to construction. These impacts are expected to be less than significant.	<u>No impact.</u>

Potential Impact	Build Alternative	No-Build Alternative
Hazards & Hazardous Materials	The Build Alternative is not anticipated to impact hazardous waste materials during ground disturbance. Additional testing would be conducted and a Spill Prevention, Control and Countermeasure Program would be prepared prior to construction. <u>Mitigation measures would</u> <u>be implemented to reduce impacts to a</u> <u>less than significant level.</u>	<u>No impact.</u>
Hydrology and Water Quality	The Build Alternative will be designed to maintain existing drainage patters in the Project area and ensure that it does not contribute to flooding up or downstream. <u>Construction-related temporary impacts to</u> water quality could occur, but these impacts would be less than significant through the implementation of Best <u>Management</u> Practices during <u>construction.</u>	<u>No Impact.</u>
Noise (Construction)	The Build Alternative would cause temporary construction noise that could impact adjacent residences. <u>Mitigation measures would ensure impacts are less than significant.</u>	<u>No impact.</u>
Recreation	The Build Alternative would not cause or accelerate substantial physical deterioration of existing area parks or recreational facilities nor result in substantial interference to park recreation. <u>A less than significant impact would</u> <u>occur.</u>	<u>No impact.</u>
Transportation and Traffic	Short-term traffic operations at intersections would be temporarily affected during construction of the trail crossings; however, one lane in each direction would remain open for through traffic throughout construction. <u>A traffic management plan will be developed by the City to ensure these impacts are reduced to a less than significant level.</u>	The No-Build is inconsistent with the City's General Plan and Bicycle Master Plan. <u>Less than significant</u> impact.
Cumulative Impacts	The Build Alternative is not expected to result in any cumulative impacts.	<u>No impact.</u>

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1.0 BUILD ALTERNATIVE

1.1 Introduction

This environmental document is prepared in conformance with the requirements the California Environmental Quality Act (CEQA) Public Resources Code (PRC) 21000-21178. The California Department of Transportation (Caltrans) is preparing a separate environmental document consistent with the requirements of the National Environmental Policy Act (NEPA) 40 CFR 1500-1508. Compliance with NEPA is required since the proposed Project intends to use Federal funding for implementation. For the proposed Project, the City is the CEQA Lead Agency and Caltrans is the NEPA Lead Agency.

In order to provide decision makers, the public, and reviewing agencies a complete description of the proposed Project and a description of how it has the potential to impact the natural and human environment, this Environmental Impact Report (EIR) has been prepared. The EIR provides an overview of the proposed Project in Chapter 1, evaluates each environmental resource for potential impacts and measures to reduce those impacts in Chapter 2, and analyzes Project alternatives in Chapter 3.

1.2 Purpose and Need

The purpose of the Del Rio Trail Project 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 utilizing public right-of-way and public agency parcels;
- Connect logical origins and destinations proximate to the trail alignment by improving pedestrian and bicycle access throughout the South Land Park, Freeport Manor, Z'berg Park, Land Park, Meadowview, and Pocket communities; and
- Provide an American's with Disabilities Act (ADA)-compliant, active transportation connection to adjacent communities throughout the south Sacramento area for pedestrians and bicyclists of all ages and abilities to access schools, retail, jobs, and recreational amenities.

The Del Rio Trail Project is needed because the South Land Park, Pocket, and adjacent communities in South Sacramento currently have limited ADA-compliant, active modes of transportation to schools, retail, jobs, and recreational amenities, thereby increasing automotive dependency and Vehicle Miles Traveled while reducing opportunities for those who do not drive or do not have access to a car, including children, the elderly, the disadvantaged, and persons with disabilities.

1.3 Project Description

The City proposes to construct 4.8 miles of Class I multi-use trail along the abandoned railway corridor west of Freeport Boulevard from the Sacramento River Parkway north of Sutterville Road to south of Meadowview/Pocket Road (Build Alternative). See Figure 3 and Appendix D for a detailed project features exhibit. The Build Alternative includes the following proposed improvements:

The proposed Build Alternative begins along the Sacramento River Parkway where the railroad bridge crosses Interstate 5 (I-5) and Riverside Boulevard. The Del Rio Trail would connect to the Parkway just south of the bridge crossing on a perpendicular alignment with a cross section consisting of a paved 12-foot wide multi-use trail and 2-foot unpaved shoulders. The trail would cross I-5 and Riverside Boulevard on a cantilevered structure attached to the south side of the existing railroad bridge. The cantilevered structure would accommodate a 12-foot multi-use trail and would provide adequate clearance from the existing track so as not to interfere with current rail operations.

South of the bridge, the trail (12 feet of pavement with 2-foot unpaved shoulders) would be constructed along the west side of the railroad embankment at the same grade as the rail lines with a 16-foot offset between the centerline of the trail to the centerline of the existing railroad track. Along its west edge, a

railing would be provided, and the trail would be supported by a 2:1 embankment that would extend approximately 40 feet from the trail's outer edge. Along Riverside Boulevard, an ADA compliant access path would provide access from Riverside Boulevard to the multi-use trail. In addition, along San Mateo Way, a paved trailhead parking lot would be constructed to provide additional access opportunities.

The trail would continue in a southerly direction parallel to the west side of the tracks until it intersected Sutterville Road. At Sutterville Road, the trail would cross the roadway at a perpendicular angle with ADA access ramps constructed approaching and departing Sutterville Road. A pedestrian actuated traffic signal would be constructed, and the rail facilities (signal, gates, and approximately 160 feet of track) would be removed. In addition, along the north side of Sutterville Road approximately 40 feet of sidewalk would be constructed east of the trail crossing to connect to the existing separated sidewalk. Similarly, along the north side of Sutterville Road, approximately 560 feet of curb, gutter, and sidewalk would be constructed west of the trail crossing to connect to the existing sidewalk terminus east of the Riverside Boulevard ramp. In conjunction with the sidewalk west of the trail, approximately 250 feet of retaining wall would be constructed, and the Class II bike lane stripe will be extended along the north side of Sutterville Road from the Riverside Boulevard ramp intersection easterly to the trail crossing. Along the south side of Sutterville Road, approximately 50 feet of sidewalk would be constructed in an east-west direction to reestablish the existing sidewalk connection across the new trail.

South of Sutterville Road, the trail would continue in a southerly direction parallel to the west side of the existing railroad tracks. The trail in this area would consist of 12 feet of pavement with 3-foot unpaved shoulders. Where the trail intersects South Land Park Drive, the trail would cross the roadway at a perpendicular angle, a Rectangular Rapid Flashing Beacon (RRFB) would be installed to alert vehicular traffic of bicycle/pedestrian activity, and the rails would be encased (but visible) in decorative concrete across the roadway. Additional improvements at this intersection would include approximately 50 feet and 60 feet of curb, gutter, and sidewalk on the north and south side of South Land Park Drive, respectively, to connect to existing curb, gutter, and/or sidewalk adjacent to the trail, ADA access ramps at the trail's approach and departure to South Land Park Drive, advance signs/pavement markings for the RRFB, and approximately 75 feet of track removal (where it conflicts with curb/gutter and ADA access ramps).

After crossing South Land Park Drive, the trail would continue in a southerly direction parallel to the west side of the tracks with a configuration consisting of 12 feet of pavement and 3-foot unpaved shoulders. As the trail approaches Del Rio Road, approximately 30 feet of existing railroad track would be removed where the trail crosses the tracks at a skewed angle. The trail would proceed south across Del Rio Road where the existing rails would be encased (but visible) in decorative concrete across the roadway. At this same crossing location, the three-legged Normandy Lane/Del Rio Road/27th Avenue intersection would be reconfigured to bring the streets together at 90-degree angles and stop signs would be installed on each leg of the intersection.

Continuing south, parallel to 27th Avenue, the trail would follow the alignment of the existing tracks with a configuration consisting of 12 feet of pavement and 3-foot unpaved shoulders. The existing embankment would be lowered to an elevation similar to that of 27th Avenue and Del Rio Road. Approximately 123 feet of track would be removed and approximately 165 feet of track would be relocated south of the 27th Avenue bend where track is currently missing. The existing asphalt access ramps that provide an east-west path of travel across the tracks would be removed and replaced with an ADA-compliant pathway.

South of Del Rio Road, the trail would continue with the same 12-foot paved trail/3-foot unpaved shoulders configuration and would be aligned between the Del Rio Detention basin and the existing railroad tracks. In this segment, the trail would be constructed at the same grade as the rail lines, supported by 2:1 embankment sideslopes that would avoid encroachment into the storage area of the Del Rio Detention Basin.

Where it meets Fruitridge Road, the trail would proceed south across the roadway where the existing rails would be encased (but visible) in decorative concrete. Additional improvements at this crossing would include a pedestrian actuated traffic signal with advance signs/pavement markings, approximately 500 feet of curb, gutter, and sidewalk on the south side of Fruitridge Road connecting to existing curb, gutter,

and/or sidewalk adjacent to the trail, ADA access ramps at the trail's approach and departure to Fruitridge Road, adjustment of the chain link fence on the south side of the road for sight distance, and removal of approximately 55 feet of track (where it conflicts with a skewed trail, curb/gutter, and ADA access ramps). After crossing Fruitridge Road, the trail would continue south along the track alignment with a 12-foot paved section and adjacent 3-foot unpaved shoulders. Approximately 350 feet south of Fruitridge Road, the multi-use trail would diverge from the track alignment, veering slightly east and following the grade up the embankment. The multi-use trail at the top of the embankment would include 12-feet of pavement with 2-foot shoulders.

Just north of 35th Avenue, the trail would descend from the embankment and proceed south across 35th Avenue where the existing rails would be encased (but visible) in decorative concrete across the roadway. Additional improvements at this crossing would include curb extensions and curb, gutter, and sidewalk on the north and south side of the road at the trail crossing, advance signs/pavement markings, ADA access ramps at the trail's approach and departure to 35th Avenue, and removal of approximately 25 feet of track (where it conflicts with curb, gutter, and sidewalk).

Continuing south, the trail would parallel the east side of the tracks with a 12-foot paved multi-use trail, a two-foot shoulder on the east and a 5-foot shoulder on the west (between the rails). At 43rd Avenue, the trail would proceed south across the roadway where the existing rails would be encased (but visible) in decorative concrete. Additional improvements at this crossing would include curb extensions and curb, gutter, and sidewalk on the north and south side of the road at the trail crossing, advance signs/pavement markings, ADA access ramps at the trail's approach and departure to 43rd Avenue, and removal of approximately 15 feet of track (where it conflicts with curb, gutter, and sidewalk).

South of 43rd Avenue, the trail would parallel the east side of the tracks with a 12-foot paved multi-use trail, a 2-foot shoulder on the east and a 5-foot shoulder on the west (between the rails). Ultimately, the trail would diverge from the tracks, intersect the access road at Charlie Jensen Park, and continue in a southerly direction, utilizing the 14-foot pavement width of the access road. Along the access road, 3-foot unpaved shoulders would be constructed, and the existing pavement would be overlayed. Approximately 650 feet south of Charlie Jensen Park, a 12-foot paved access path would be constructed to the west connecting the trail to 14th Street. At the location where this access path crosses the existing railroad tracks, the rails would be encased (but visible) in concrete.

Where the existing park access road ends, the trail would continue south, paralleling the east side of the existing railroad tracks with a paved 14-foot multi-use trail and 3-foot unpaved shoulders, until it reaches the existing drainage channel. The trail would cross the drainage channel along the current track alignment, removing the existing structurally deficient wooden bridge and replacing it with a new single span structure that would accommodate a 12-foot wide trail. Additional improvements at the bridge site would include the removal of approximately 71 feet of track and relocation of approximately 49 feet of track to the area north of the bridge where there is currently a gap in the existing track alignment.

South of the bridge crossing, the trail (12-feet of pavement with 3-foot unpaved shoulders) would parallel the east side of the tracks for several hundred feet before merging with the track to the west of the City of Sacramento's Department of Utilities facility. Along the merged section, which is approximately 350 feet in length, the rails would be encased in concrete, but still visible. Once south of the utility facility, the trail would diverge from the track, paralleling the railroad to the east all the way to Florin Road. Along this segment, additional improvements would include a trailhead parking lot with entrance and exit tapers along Freeport Boulevard, and 12-foot paved access pathways to both Palomar Circle and the commercial property on the northwest corner of the Florin Road/Freeport Boulevard intersection. Both access pathways will cross the tracks with a concrete encasement for safety.

At Florin Road, the trail would veer east to the existing northwest corner of the Florin Road/Freeport Boulevard intersection. Trail users would cross Florin Road in a north-south direction utilizing the westerly crosswalk at the existing signalized intersection. Additional improvements at the intersection would include minor signal modifications, enlarging the curb return areas at the northwest and southwest corners and extending curb, gutter, and sidewalk approximately 100 feet west along both the north and south side of Florin Road to connect to existing curb, gutter, and sidewalk.

From the southwest corner of Florin Road/Freeport Boulevard, the trail would veer slightly west and climb the embankment that develops to the south. At the top of the embankment, the trail would parallel the existing railroad tracks to the east with a configuration consisting of 12 feet of pavement, a 2-foot unpaved shoulder to the east and a 5-foot unpaved shoulder (between the rails) on the west. The trail would continue along the top of the east side of the embankment for approximately 1,800 feet before descending along the westerly slope. Along its descent, the trail would cross the existing railroad tracks at a horizontal skew and on a vertical downgrade, resulting in the removal of 35 feet of track. At the foot of the embankment, the trail would continue south, paralleling the west side of the embankment with a12-foot paved width and adjacent 3-foot shoulders until reaching Meadowview/Pocket Road. Along the way, two access pathways matching the trail dimensions would connect the trail to Z'Berg Park to the west.

Approaching Meadowview/Pocket Road, the trail would veer east to the existing northwest corner of the Meadowview/Pocket/Freeport Boulevard intersection. Trail users would cross Meadowview/Pocket Road in a north-south direction utilizing the westerly crosswalk at the existing signalized intersection. Additional improvements at the intersection would include minor signal modifications, enlarging the curb return areas at the northwest and southwest corners, extending curb, gutter, and sidewalk approximately 210 feet west along both the north and south side of Meadowview/Pocket Road to connect to existing curb, gutter, and sidewalk, and removing approximately 20 feet of track (where it conflicts with curb, gutter, and sidewalk).

From the southwest corner of Meadowview/Pocket/Freeport Boulevard, the trail would veer slightly west and continue in a southerly direction paralleling the east side of the existing railroad tracks with a12-foot paved width and adjacent 3-foot unpaved shoulders.

The Build Alternative would end approximately 0.4 mile south of Pocket Road near the Freeport Water Tower adjacent to the I-5 bridge over Freeport Boulevard. At the southern terminus, the bike trail would connect directly to the newly constructed Freeport Shores Trail and the South Sacramento Parkway West Trail.

All roadway crossings along the proposed trail alignment would receive safety lighting and cautionary signs on the roadway approaches. Striping/ decorative pavement, where noted, would designate the path of travel that trail users are to follow and would provide another visual alert for vehicles that pedestrians could be crossing the road.

Along the trail approaches to the roadway intersections, the horizontal alignment of the trail would contain a bulb out to slow down approaching bicyclists. In addition, signing and striping would be provided in advance of roadway intersections to warn users that they will need to stop at the approaching intersection.

Permanent right-of-way acquisitions and temporary construction easements would be needed where the trail passes through Sacramento Regional Transit and state-owned parcels.

This project is federally funded through the Active Transportation Program grant and therefore requires compliance with both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). The lead agency for CEQA compliance is the City; the federal lead agency for NEPA compliance is Caltrans.

1.4 The Environmental Review Process

The CEQA requires public agencies to identify, disclose, and consider the potential environmental impacts of proposed discretionary actions that an agency is considering for approval. A Project that may have a significant impact on the environment cannot be approved unless the Lead Agency makes the approval contingent upon the implementation of mitigation measures that would reduce or avoid that

impact to the extent feasible. When a Project may have significant environmental impacts, the Lead Agency must prepare an EIR before it considers whether to approve the Project.

The City, as the CEQA Lead Agency for the proposed Project, prepared a Draft EIR for public review and comment. The Draft EIR was available for review and comment by public agencies and the public for a period of 59 days. The City has prepared this Final EIR that includes the comments received on the Draft EIR, written responses to those comments, a list of the commenters, and any revisions being made to the Draft EIR that are initiated by the City or in response to the comments. This Final EIR will be considered in combination with the Draft EIR by the City Council when acting on the proposed Project.

1.5 CEQA Purpose and Authority

This EIR has been prepared pursuant to the CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.). CEQA requires that State and local government agencies consider the environmental consequences of Projects over which they have discretionary authority before taking action on those Projects (PRC 21000 et seq.).

The purpose of this EIR is to analyze the environmental impacts of the proposed Project and establish ways to reduce or avoid these potential impacts. Additionally, this EIR identifies alternatives to the proposed Project that would meet most Project objectives and reduce one or more potential environmental impacts.

The CEQA requires that each public agency mitigate or avoid the significant environmental effects of Projects it approves or implements, whenever feasible. An EIR is an informational document used in State, regional, and local planning and decision-making processes to disclose potential environmental effects. The purpose of this EIR is not to recommend approval or denial of a Project. However, the public agency's decision whether to approve or to deny the proposed Project must take into consideration the information provided by the EIR.

When considering the proposed Project, the public agency may grant approval even if it would result in significant and unavoidable environmental impacts so long as the EIR discloses the Project's environmental effects, including:

- Effects that cannot be avoided;
- Growth inducing effects;
- Effects found not to be significant; and
- Cumulative impacts.

The CEQA provides that a Lead Agency that intends to approve a Project with significant and unavoidable effects must identify the "[s]specific economic, legal, social, technological, or other considerations..." that make specific infeasible mitigation measures or alternatives identified in the EIR. In addition, the Lead Agency in such a case must identify the benefits of the Project that outweigh the significant effects on the environment (Statement of Overriding Considerations).

Accordingly, this EIR describes and evaluates the potential impacts associated with the proposed Project. Additional resource-specific studies, such as visual resources, biological resources, cultural resources, hazardous waste, noise, community impacts, traffic control, and water quality have been prepared for this EIR to provide detailed information about the proposed Project's potential impacts on the environment. These technical studies are available for review at the City of Sacramento Community Development Center and on the Project website at:

http://www.cityofsacramento.org/Public-Works/Engineering-Services/Projects/Current-Projects/Del-Rio-Trail

The mitigation measures identified in this EIR are designed to include enough detail and specificity to ensure that they would be effectively carried out to reduce the proposed Project's impacts.

1.6 Lead Agency Determination

As the public agency undertaking the proposed Project, the City is designated as the Lead Agency. CEQA Guidelines Section 15367 defines the Lead Agency as ". . . the public agency, which has the principal responsibility for carrying out or approving a Project." Other public agencies may use this document in their decision-making or permit processes.

The Draft and Final EIR were prepared by Dokken Engineering in close coordination with the City. This Final EIR reflects the independent judgment and analysis of the City as required by the CEQA. A list of those involved in report preparation is provided in Chapter 6.0 of this EIR.

1.7 Notice of Preparation

The CEQA does not require formal hearings at any stage of the environmental review process (CEQA Guidelines Section 15202[a]). However, it does encourage "wide public involvement, formal and informal, to receive and evaluate public reactions to environmental issues" (CEQA Guidelines Section 15201).

In accordance with the CEQA Guidelines, the City distributed a Notice of Preparation (NOP) of a Draft EIR for the proposed Project on June 8, 2018 and gave the public an opportunity to provide comment on the scope of the analysis that should be included in the Draft EIR. The NOP comment period closed on July 9, 2018. The comments received by the City on the NOP were considered in the preparation of the Draft EIR. The scope of the Draft EIR included the potential environmental impacts identified in the NOP, as well as any issues raised by agencies and the public in response to the NOP. The NOP and comments received during the NOP comment period are contained in Appendix C of this Final EIR.

1.8 Public Outreach

The City is dedicated to public and stakeholder outreach and ongoing public communications beyond what is required by the CEQA for the Del Rio Trail Project. In order to gather feedback from the community regarding a potential trail in support of the Active Transportation Program (ATP) grant application for the proposed Project, City staff coordinated with the South Land Park Neighborhood Association (SLPNA) to host a public meeting on April 22, 2015. Approximately 2,700 invitations were sent out to residents, businesses, schools, and government officials. Groups in attendance included members of SLPNA, Land Park Community Association (LPC), California State Parks, Sacramento Rapid Transit, and the Railroad Foundation. The proposed Project concept was introduced to members of the public, and initial comments were collected by City staff and representatives from SLPNA. Board members of SLPNA and LPC expressed their support for the proposed Project and stated that they do not want a running rail line near their communities. Attendees on behalf of the railroad stated that they were not in favor of the trail and would instead prefer a "Rail-with-Trail" Project.

After the ATP Cycle 2 Grant was awarded in 2015, the City created a public outreach program to share information and obtain feedback to better define the proposed Project. This included creating a publicly accessible page on its website with a list of resources and materials for information regarding the proposed Project:

http://www.cityofsacramento.org/Public-Works/Engineering-Services/Projects/Current-Projects/Del-Rio-Trail

The City distributed two newsletters announcing public workshops and providing basic information about the proposed Project. At these meetings, the public submitted questions and comments on comment cards, which were reviewed and considered for integration into Project planning. Frequently asked questions were made available on the Project website. Sixteen meetings have been held regarding the proposed Project:

1. August 1, 2017 – South Land Park Neighborhood Association National Night Out

Alice Birney Elementary School 6251 13th Street., Sacramento, CA 7:00 p.m.-8:00 p.m.

Representatives from the City and the project team presented the current project design, answered questions, and collected contact information for inclusion in the project outreach database.

2. March 22, 2017 – The Del Rio Trail Project Public Workshop No. 1

Pony Express Elementary School (Cafeteria) 1250 56th Ave, Sacramento, 95831 5 p.m.-7 p.m.

During the first hour of the open-house style meeting, attendees visited five information stations to learn about the proposed Project, discuss their ideas, and share their comments, concerns, and suggestions.

At 6 p.m., Councilmember Jay Schenirer addressed meeting attendees, introduced a representative from Councilmember Steve Hansen's office, Consuelo Hernandez, and expressed support for the proposed Project. Meeting facilitator Lucy Eidam Crocker introduced Pamela Dalcin-Walling of Dokken Engineering and Jesse Gothan with the City of Sacramento Public Works. Ms. Dalcin-Walling and Mr. Gothan gave a Project overview presentation.

The Project overview presentation was followed by a seven-member comment/question panel. The panel addressed general questions about the proposed Project, as well as questions regarding safety, access points and crossings, enhancements, construction and maintenance, and funding.

3. March 29, 2017 - South Land Park Neighborhood Association Annual Meeting

Pony Express Elementary School 6:30 p.m.

The City attended a SLPNA meeting as a guest and presented information regarding the trail.

4. June 1, 2017 – 27th Ave/Normandy Lane/Del Rio Road Intersection Focus Meeting

Lutheran Church of the Master 1900 Potrero Way, Sacramento, CA 95822 5 p.m.-7:30 p.m.

Residents who live near the 27th Avenue/Normandy Lane/Del Rio Road Intersection met with members of the Project team to discuss concerns and share comments about the proposed Project. Pamela Dalcin-Walling, Project Manager from Dokken Engineering, presented a Project overview.

The meeting was focused on the unique horizontal and vertical constraints of this particular intersection that would make a new pedestrian and bicycle crossing challenging. The Project team also discussed sidewalks, safety, and privacy, and reviewed upcoming scheduled meetings and the Project timeline before the meeting came to a close.

5. June 8, 2017 - The Del Rio Trail Project Public Workshop No. 2

June 8, 2017 Pony Express Elementary School (Cafeteria) 1250 56th Ave, Sacramento, 95831 5 p.m.-7 p.m. Between 5 p.m. and 6:15 p.m., attendees visited five stations to learn about the proposed Project, discuss their ideas, and share their comments, concerns, and suggestions. Pamela Dalcin-Walling of Dokken Engineering provided a Project overview and update and reviewed the activities that had occurred since the last Project meeting. Following the presentation, there was an open Q&A session between the audience and Project team members present. The session addressed general questions about the proposed Project, as well as questions regarding safety, access points and crossings, enhancements, construction and maintenance, and funding.

6. June 21, 2017 - Land Park Community Association Meeting

Eskaton Monroe Lodge 3225 Freeport Blvd, Sacramento, CA 95818 6:30 p.m.

The City attended a monthly LPC meeting as a guest and presented information regarding the trail.

7. August 17, 2017 - Office Hours Meeting

New Technology High School 1400 Dickson Street, Sacramento, 95822 5 p.m.-7 p.m.

This was an informal, office hours meeting that allowed members of the community to visit Project stations and ask members of the Project team questions one-on-one. A formal presentation was not given. Questions addressed during the workshop included Project aspects such as plantings, property access, the preservation of the historic rail line, safety along the trail, and maintenance.

8. December 11, 2017 - Regional Transit Board Meeting

RT Auditorium 1400 29th Street, Sacramento, CA 5:30 p.m.

Jesse Gothan from the City of Sacramento Public Works presented an overview of the proposed Project. Two members of the SLPNA addressed the board to speak in favor of the proposed Project. Eleven board members of SPLNA attended this meeting and several spoke in favor of the trail.

9. December 18, 2017 - Meeting with the California State Railroad Museum Foundation

Sacramento City Hall 915 I St, Sacramento, CA 1 p.m.-2 p.m.

City representatives met with members of the Board of the California State Railroad Museum Foundation (Foundation) to discuss the proposed Project and any updates since they last met. The Foundation Board emphasized that the Foundation was not against the bike trail, but their main goal is the preservation of the railroad line. The City presented examples and renderings of aesthetic features of the trail that would serve to memorialize the historic nature of the corridor. The Foundation Board informed the City that they would discuss this information with other Foundation Board members in January.

10. February 22, 2018 – Sutterville Elementary Parent Teacher Association Meeting

Sutterville Elementary School 4967 Monterey Way, Sacramento, CA The City attended a Parent Teacher Association (PTA) meeting as a guest and presented information regarding the trail.

11. March 23, 2018 - South Land Park Neighborhood Association Annual Meeting

Pony Express Elementary School (cafeteria) 1250 56th Ave, Sacramento, CA 6:30 p.m.

The City attended a SLPNA meeting as a guest and presented information regarding the trail.

12. April 4, 2018 – 2nd Meeting with the California State Railroad Museum Foundation

Sacramento City Hall 915 I St, Sacramento, 95814 11 a.m.-12 p.m.

The City met with members of the Board of the California State Railroad Museum Foundation to present an updated Project design, modified to address concerns expressed by the foundation in their initial meeting.

13. May 16, 2018 - Land Park Community Association Meeting

Eskaton Monroe Lodge 3225 Freeport Blvd., Sacramento, CA 6:30 p.m.-7:30 p.m.

The City attended a monthly LPC meeting as a guest, presented information regarding the trail, and answered questions.

14. May 23, 2018 – Preservation Sacramento

Urban Hive 1601 Alhambra Blvd., Sacramento, CA 6:00 p.m.-7:00 p.m.

The City of Sacramento met with members of Preservation Sacramento to present the project design and obtain reaction/feedback.

15. June 27, 2018 – South Land Park Community Meeting

Alice Birney Elementary School 6251 13th Street., Sacramento, CA 7:00 p.m.-8:00 p.m.

SLPNA held a community meeting to provide up-to-date facts regarding the railroad opposition to the trail and to report on the planning efforts associated with the trail. Brief presentations were made by Brian Ebbert, Chuck Hughes, Jay Schenirer, and Scott Burns. The project team as well as representatives from City of Sacramento Police Department, City Park Rangers, and Jim Cooper's office were on hand to answer questions from the attendees.

16. August 1, 2018 – South Land Park Neighborhood Association National Night Out

Alice Birney Elementary School 6251 13th Street., Sacramento, CA 7:00 p.m.-8:00 p.m. Representatives from the City and the project team presented the current project design, answered questions, and collected contact information for inclusion in the project outreach database.

17. December 6, 2018 – Public Information Meeting

Pony Express Elementary School 1250 56th Avenue, Sacramento, CA 6:00p.m. – 8:00 p.m.

A public meeting was held during circulation of the CEQA environmental document to collect comments regarding the proposed Project and the Draft EIR. The project team was on hand to answer any questions and collect comment cards from the public

1.9 Scope of the Draft EIR

The analysis included in Chapter 2.0 focuses on the specific environmental resource topics that require further evaluation to determine if they have a potential impact. Comments received during the scoping process were taken into consideration in development of this EIR based on a comparison with the CEQA Checklist Guidelines (Appendix A). Environmental issues identified in the NOP that received no additional public comment and are determined to have no significant or a less than significant impact are disclosed in the following paragraph. Environmental issues with a potentially significant impact identified during the NOP and scoping process are further evaluated for determination of level of significance and are summarized under the following heading "Effects Determined to Be Significant" below and in more detail in Chapter 2.0.

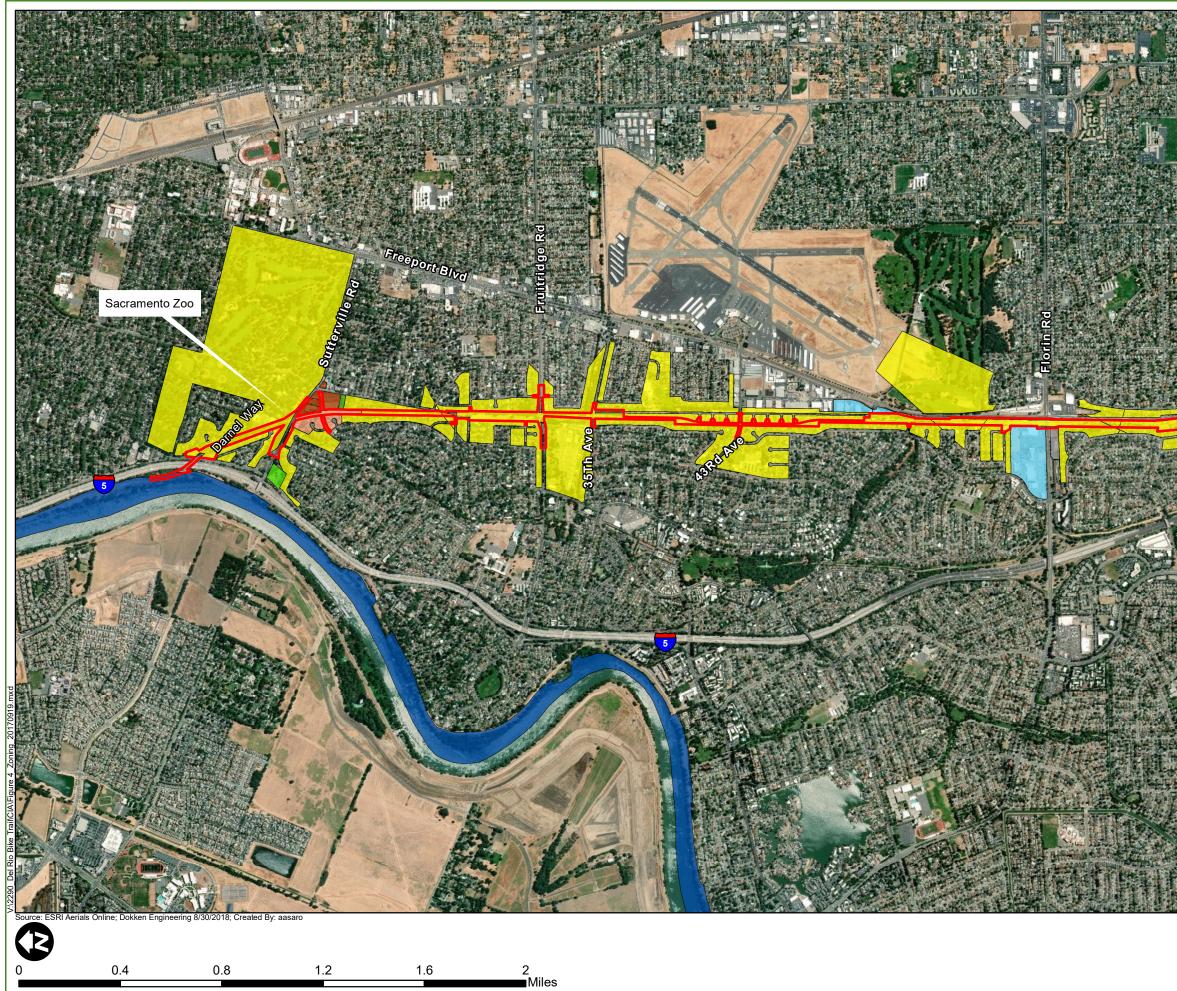
Environmental Issues Determined Not to Be Significant

Pursuant to the CEQA Guidelines, the discussion of the potential impacts on the physical environment can be focused on those impacts that may be significant or potentially significant. The CEQA allows a Lead Agency to limit the details of discussion of the environmental effects (impacts) that are not considered potentially significant (PRC Section 21100, CCR Sections 15126.2[a] and 15128). The CEQA requires that the discussion of any significant effects on the environment be limited to substantial or potentially substantial adverse changes in physical conditions that exist within the affected area, as defined in PRC Section 21060.5 (Statutory definition of "environment").

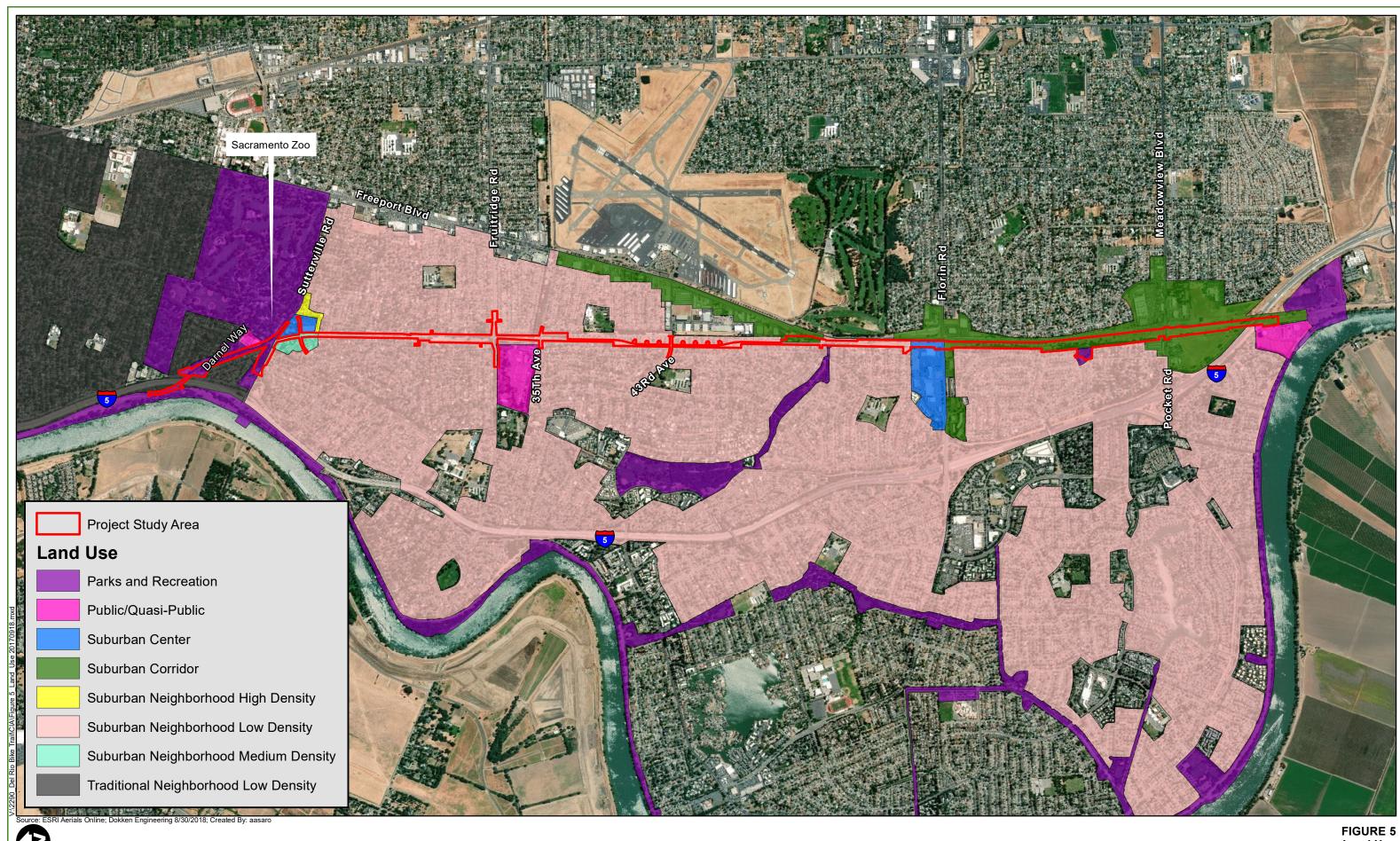
Impacts dismissed in an analysis as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless the Lead Agency subsequently receives information inconsistent with the finding (CCR Section 15143). As part of the NOP scoping process, it was determined that implementation of the proposed Project would result in no impact (i.e., not significant) related to the following resources; and are, therefore, not discussed at further length in this EIR:

Agricultural and Forestry Resources: The proposed Project site has been designated as Parks and Recreation, Public/Quasi Public, Suburban Center, Suburban Corridor, Suburban Neighborhood High Density, Suburban Neighborhood Low Density, Suburban Neighborhood Medium Density, and Traditional Neighborhood Low Density in the 2035 General Plan. The Project site is zoned "A" for Agricultural, "C-1" for Limited Commercial, "C-2" for General Commercial, "F" for Flood, "M-1" for Industrial, "OB" for Office Building, "R-1" for Standard Single Family, "R-2" for Two-Family, "R-3" for Multi-Family, "SC" for Shopping Center, and "TC" for Transportation Corridor (see Figures 4 and 5). The proposed Project is not adjacent to, nor located on, lands that are zoned for forest land or timberlands. Parcels directly south of the project site are zoned "A" for Agricultural; however, the current land use for that parcel is the Freeport Water Tower (see Figures 4 and 5). There are no agricultural resources located directly within the project area. Therefore, no impacts to agricultural and forestry resources would occur and this issue is not discussed further in this EIR.

Mineral Resources: According to the City of Sacramento 2035 General Plan Master EIR, no significant mineral deposits have been identified within the proposed Project corridor (City of Sacramento 2014). Additionally, the proposed Project is not located within an Aggregate Resource Area as identified by the



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	General Commercial (C-2)
	Flood (F)
	Industrial (M-1)
	Office Building (OB)
	Standard Single Family (R-1)
	Two-Family (R-2)
	Multi-Family (R-3)
	Shopping Center (SC)
	Transportation Corridor (TC)
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2 ∎Miles FIGURE 5 Land Use ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

City of Sacramento 2035 General Plan Land Use Diagram (City of Sacramento 2015). Therefore, no impacts to mineral resources would occur and this issue is not discussed further in this EIR.

1.10 Effects Determined to Be Potentially Significant

The NOP and Project scoping process identified the following environmental issues may have potential environmental impacts that require further analysis in the EIR. Accordingly, the following environmental issues are evaluated in this EIR:

Aesthetics (AES)	Hazards and Hazardous Materials (HAZ)	Recreation (REC)
Air Quality (AIR)	Hydrology and Water Quality (WQ)	Transportation and Traffic (TRA)
Biological Resources (BIO)	Land Use and Planning (LU)	Tribal Cultural Resources (TCR)
Cultural Resources (CUL)	Noise (NOISE)	Utilities and Services Systems (UTL)
Geology and Soils (GEO)	Population and Housing (POP)	Greenhouse Gas Emissions (GHG)
Public Services (PUB)		

1.11 Relationship to Other Documents

This EIR incorporates, by reference, the environmental analysis and other information contained in the City of Sacramento 2035 General Plan (2015), the Final City of Sacramento Bicycle Master Plan (2018), and the Old Sacramento State Historic Park General Plan (2014). The full text of the City of Sacramento 2035 General Plan is available online at: https://www.cityofsacramento.org/Community-Development/Resources/Online-Library/2035--General-Plan

The full text of the Final City of Sacramento Bicycle Master Plan is available online at: https://www.cityofsacramento.org/Public-Works/Transportation/Programs-and-Services/Bicycling-Program

The full text of the Old Sacramento State Historic Park General Plan is available online at: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

2.0 ENVIRONMENTAL IMPACT ASSESSMENT

In accordance with CEQA Guidelines Section 15126.2, this EIR identifies and focuses on the significant direct and indirect environmental effects (impacts) of the proposed Project, considering both its short-term and long-term effects. Short-term effects are generally those associated with construction of the proposed Project, while long-term effects are generally those associated with operation of the proposed Project.

Organization of Environmental Issue Assessment

Each environmental issue analyzed in Chapter 2.0 contains the following components:

Regulatory Framework presents the laws, regulations, plans, and policies that are relevant to each issue area. Regulations originating from the Federal, State, and/or local levels are each discussed, as appropriate.

Environmental Setting presents the existing environmental conditions within the proposed Project boundaries and within the surrounding Project area, as appropriate, to establish baseline conditions, in accordance with CEQA Guidelines Section 15125. The extent of the environmental setting area evaluated (the Project study area) differs among resources, depending on the locations where impacts would be expected. For example, air quality impacts are assessed for the air basin (macro-scale), as well as the site vicinity (micro-scale), whereas aesthetic impacts are assessed for the Project vicinity only.

Methodology of Analysis includes the methodology to determine what constitutes a significant impact, the Thresholds of Significance used to determine the level of significance of the environmental impacts for each resource topic, in accordance with CEQA Guidelines Sections 15126, 15126.2, and 15143, and the Project Impact Analysis and documentation of any required mitigation measures. The Thresholds of Significance used in this EIR were developed using criteria from the CEQA Guidelines (see Appendix A); Federal, State, and local regulatory schemes; local/regional plans and ordinances; accepted practice; consultation with recognized experts; and other professional opinions.

Project Impacts identify the level of each environmental impact by comparing the effects of the proposed Project to the environmental setting. Project impacts are organized numerically in each subsection (e.g., Impact AES-1, Impact AES-2, Impact AES-3). A bold-font environmental impact statement precedes the discussion of each impact while its level of significance follows the discussion of each impact. The discussion that follows the impact summary includes the substantial evidence supporting the impact significance conclusion.

Required Mitigation includes specific details of the mitigation identified in the Environmental Impacts with performance standards, timing, and responsible parties identified.

Format Used for Impact Analysis and Mitigation Measures

The format adopted in this EIR to present the evaluation of environmental impacts is described and illustrated below. Abbreviations used in the impact analysis and mitigation measure numbering are shown in Section 1.0.

Summary Heading of Impact (Example)

Impact AIR-1: An impact summary heading appears immediately preceding the impact description (Summary Heading of Impact in this example). The impact abbreviation identifies the section of the report (AIR for Air Quality in this example) and the sequential order of the impact (1 in this example) within that section. To the right of the impact number is the impact statement, which identifies the potential impact.

Narrative Analysis: A narrative analysis follows the impact statement assessing the baseline condition of the proposed Project compared to the established Threshold of Significance. This analysis identifies any

potential mitigation required and explains how the mitigation would mitigate the potential impact. The analysis concludes with what the Level of Significance is with all factors considered.

Level of Significance: Less than Significant with Mitigation (the evaluated Level of Significance concluded in the analysis is included here, such as Less than Significant with Mitigation in this example).

This section describes the determination of the severity of Project impacts. This is fundamental to achieving the objectives of CEQA. The CEQA Guidelines Section 15091 requires that decision-makers mitigate, as completely as is feasible, the significant impacts identified in the Draft and Final EIRs. Levels of significance can fall into four categories: No Impact; Less Than Significant; Less Than Significant With Mitigation; or Significant Unmitigated Impact. If the EIR identifies any significant unmitigated impacts, the CEQA Guidelines Section 15093 requires decision-makers to adopt a statement of overriding considerations that explains why the benefits of the Project outweigh the adverse environmental consequences identified in the EIR.

The Level of Significance for each impact examined in this EIR is determined by considering the predicted magnitude of the impact against the applicable threshold. This section also identifies the resulting level of significance of the impact, including the implementation of mitigation measures (if required).

Mitigation Required: Mitigation Required lists any feasible measures that could avoid, minimize, rectify, reduce, or compensate for significant adverse impacts, with measures having to be fully enforceable through incorporation into the Project (PRC Section 21081.6[b]) as discussed under the impact analysis.

Mitigation measures are not required for environmental impacts that are found to be less than significant. Mitigation for a significant environmental impact is described following the impact, where feasible and available. If sufficient feasible mitigation was not available to reduce environmental impacts to a less than significant level, or where the Lead Agency lacked the authority to ensure that the mitigation be implemented when needed, the impacts would be identified as significant and unavoidable. None of the impacts identified for the proposed Project have been identified as significant and unavoidable.

In some cases, following the impact discussion, reference is made to State and Federal regulations and agency policies that would fully or partially mitigate the impact. In addition, policies and programs from applicable local land use plans that partially or fully mitigate the impact may be cited.

Project-specific mitigation measures, beyond those contained in other documents, are identified with a summary heading and described using the format presented below:

Mitigation Measure (AIR-1): The description indicates Project-specific mitigation identified that would reduce the impact to the lowest degree feasible.

2.1 AESTHETICS AND VISUAL RESOURCES

This section describes the regulatory and environmental setting for aesthetics and visual resources. It also describes impacts to aesthetics and visual resources that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal and State

There are no roadways near the Project site that are designated in Federal or State plans as a scenic highway or route worthy of protection for maintaining and enhancing scenic viewsheds.

Local

City of Sacramento 2035 General Plan (2015)

The following goals and policies from the Land Use and Urban Design (LU) Element and the Environmental Resources (ER) Element related to aesthetics, light, and glare are relevant to the proposed Project (City of Sacramento 2015). Those goals and policies that directly pertain to the proposed Project are discussed in the impact analysis below.

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

Policy LU 2.3.1 Open Space System. The City shall strive to create a comprehensive and integrated system of parks, open space, and urban forests that frames and complements the City's urbanized areas.

Goal LU 2.4 City of Distinctive and Memorable Places. Promote community design that produces a distinctive, high-quality built environment whose forms and character reflect the City of Sacramento's unique historic, environmental, and architectural context, and create memorable places that enrich community life.

Policy LU 2.4.1 Unique Sense of Place. The City shall promote quality site, architectural and landscape designs that incorporate those qualities and characteristics that make the City of Sacramento desirable and memorable, including walkable blocks, distinctive parks and open spaces, tree-lined streets, and varied architectural styles.

Policy LU 2.4.2 Responsiveness to Context. The City shall promote building designs that respect and respond to the local context, including use of local materials, responsiveness to the City of Sacramento's climate, and in consideration of the cultural and historic context of the City's neighborhoods and centers.

Goal LU 2.7 City Form and Structure. Require excellence in the design of the City's form and structure through development standards and clear design direction.

Goal ER 7.1. Visual Resource Preservation. Maintain and protect significant visual resources and aesthetics that define the City of Sacramento.

Policy ER 7.1.1 Protect Scenic Views. The City shall seek to protect views from public places to the Sacramento and American rivers and adjacent greenways, landmarks, and urban views of the downtown skyline and the State Capitol along Capitol Mall.

<u>City of Sacramento Tree Planting, Maintenance, and Conservation Ordinance No. 2016-0026</u> The City has adopted provisions relating to tree planting, maintenance and conservation. City Code states the following regarding the purpose of the regulations: "The City Council finds that trees are a signature of the City and are an important element in promoting the well-being of the citizens of Sacramento. The City Council finds that, when proper arboricultural practices are applied, trees enhance the natural scenic beauty of the City; increase oxygen levels; promote ecological balance; provide natural ventilation and air filtration; provide temperature and erosion controls; increase property values; and improve the quality of life. The City Council also finds and determines that it is in the public interest to protect and manage tree resources within the City in order to preserve and maintain the benefits that they provide to the community. The purpose of this chapter is to provide for the conservation of existing tree resources; to optimize tree canopy coverage throughout the City while recognizing individual rights to develop and make reasonable use of private property consistent with the general plan; and to provide clear standards for protection, removal, and replacement of City trees and private protected trees (City Code Section 12.56.010)."

City of Sacramento Tree Ordinance: Sacramento City Code 12.56

The City has adopted regulatory policies for the preservation, protection, and maintenance of the existing trees within the City. Sacramento City Code (CC) 12.56 was amended and adopted by the City Council on August 4, 2016.

Work on and/or the removal of City trees or private protected trees requires prior approval in the form of a City of Sacramento Tree Permit (City Tree Permit). City trees are characterized as trees partially or completely located in a City park, on City owned property, or on a public right-of-way, including any street, road, sidewalk, park strip, mow strip or alley. For City trees located within City Park, the Director of the City Youth, Parks & Community Enrichment Department handles approvals for tree removal. For all other City trees located on City property or within the ROW, the City Director of Public Works handles approvals. CC section 12.56.040 includes specific requirements for notice and hearing for removal of City trees.

Private protected trees are defined as trees designated to have special historical value, special environmental value, or significant community benefit, and are located on private property. In addition, private protected trees include: 1) native trees at 12 inches DSH (i.e., coast live, interior, valley and blue oaks [*Quercus* spp.], California sycamore [*Platanus racemose*], and buckeye [*Aesculus californica*]); 2) all trees at 32 inches DSH with an existing single family or duplex dwelling; and 3) all trees at 24 inches DSH on undeveloped land or any other type of property such as commercial, industrial, and apartments (City of Sacramento 2017b).

<u>City of Sacramento Tree Ordinance: Sacramento City Code 12.56.040 Removal of City Trees—Public</u> <u>Projects</u>

Whenever feasible, the City shall modify the design of public projects to avoid the removal or damage to city trees.

If the City proposes to remove City trees that have a DSH of four inches or more as part of a public project that otherwise requires City council approval, the City project manager shall provide written justification to the director of the need to remove City trees for the public project. The director shall review the written justification and if the director agrees with the written justification the director shall make a recommendation to the City council to approve the request to remove the City trees. The request for approval from City council may take place at any stage of the public project but the City shall obtain council approval prior to removing the City trees. City trees proposed to be removed as part of a public project that either does not require City council approval or has a DSH less than four inches shall be removed as provided in Section 12.56.030(C).

The director shall provide written notice of the proposal to remove City trees as part of a public project by posting a notice of the time, date, and location of the City council meeting during which the City council is to decide whether or not to remove City trees in a conspicuous place on or in proximity to the trees at least fifteen (15) days prior to the City council meeting (Ord. 2016-0026 § 4).

Environmental Setting

Aesthetic resources are those natural resources, landforms, vegetation, and human-made structures in the region and local environment that generate sensory reactions and evaluations by viewers. The Build Alternative location and setting provides the context for determining the type of changes to the existing visual environment. The Build Alternative is located on the abandoned railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road in the City of Sacramento, Sacramento County, California. The Build Alternative is located in the U.S. Department of Agriculture (USDA) Great Valley Ecological Subsection (262A) of the California Dry Steep Province (USDA 2007). The landscape is characterized by low elevation fluvial plains with general land covers of disturbed grasslands, urban infrastructure; and is comprised of both native and non-native tree species. The land use within the Build Alternative corridor is primarily a suburban and urban landscape of residential and commercial land uses, with patches of disturbed natural areas throughout the abandoned railway corridor (see Figure 6 through 12 for existing conditions and Figure 13 for locations of key views). The Build Alternative corridor is defined as the area of land that is visible from, adjacent to, and outside the proposed trail right-of-way, and is determined by topography, vegetation, and viewing distance.

No scenic resources have been identified within the corridor through background investigations and scenic resources literature searches. Additionally, the Build Alternative corridor is not within or adjacent to a designated State Scenic Highway according to the California Scenic Highway Mapping System (2011).



Figure 6. Existing elevated segment of the abandoned railway corridor with disturbed or ruderal vegetation and dispersed trees.



Figure 7. Existing patches of native and non-native trees within abandoned railway corridor with litter and debris piles.



Figure 8. Existing disturbed grassland and ruderal vegetation along abandoned railway corridor, with fencing and dense vegetation shielding residential views.



Figure 9. Existing inactive railway corridor adjacent to commercial building in foreground, and South Land Park Drive in background.



Figure 10. Representative urban setting at the I-5 bridge facing north west on Sutterville Road.



Figure 11. Representative open space area at Charlie Jensen Park, facing north east.



Figure 12. Representative litter and debris along the corridor.

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0 0.25 0.5 0.75 1 Miles FIGURE 13 Representative Key Views ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to aesthetics and visual resources within or adjacent to the Build Alternative area. When an impact is determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

Methodology of Analysis

Using the CEQA Checklist Guidelines (see Appendix A) for guidance, the following Thresholds of Significance were established, analyzed, and evaluated using the methodology established in Section 3.1.3.2 to determine whether impacts to aesthetics and visual resources would be significant. Would the proposed Project:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or,
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Project Impact Analysis

Impact AES-1: Potential to have a substantial adverse effect on a scenic vista.

Build Alternative

The City of Sacramento 2035 General Plan (2015) designates public places that have views to the Sacramento and American Rivers as well as adjacent greenways, landmarks, and urban views of the downtown skyline and the State Capitol along Capitol Mall as scenic vistas. No scenic resources have been identified within the corridor through background investigations and scenic resources literature searches. Additionally, the Build Alternative corridor is not within or adjacent to a designated State Scenic Highway according to the California Scenic Highway Mapping System (2011). Therefore, no impact would occur to scenic vistas.

Level of Significance: No Impact.

Required Mitigation: None Required.

No Project Alternative

No scenic resources have been identified within the corridor through background investigations and scenic resources literature searches. Therefore, no impact would occur to scenic vistas.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact AES-2: Potential to damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.

Build Alternative

No scenic resources have been identified within the corridor through background investigations and scenic resources literature searches. Additionally, the Project corridor is not within or adjacent to a designated State Scenic Highway according to the California Scenic Highway Mapping System (2011).

Level of Significance: No Impact.

Required Mitigation: None Required.

No Project Alternative

No scenic resources have been identified within the corridor through background investigations and scenic resources literature searches. Additionally, the Project corridor is not within or adjacent to a designated State Scenic Highway according to the California Scenic Highway Mapping System (2011).

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact AES-3: Potential to substantially degrade the existing visual character or quality of the site and its surroundings.

Build Alternative

Visual Resources and Resource Change

Visual resources of the Project setting are defined and identified below by assessing visual character and visual quality in the Build Alternative corridor. Resource change is assessed by evaluating the visual character and the visual quality of the visual resources that comprise the Build Alternative corridor before and after the construction of the Build Alternative.

The visual character of the Build Alternative would be compatible with the existing visual character of the corridor. The Project proposes to construct 4.8 miles of Class I multi-use trail along the abandoned railway corridor; however, the overall character of the area would not change. The Build Alternative would maintain the linear form of the abandoned railway corridor. The colors throughout the abandoned corridor are a composition of light and dark vegetation (reds, yellows, oranges, and greens) interspersed with residential homes, apartments, and commercial businesses of all colors, maintained park open spaces, and roadway segments of gray and black. The vegetative character of the corridor is mostly comprised of sparse, un-manicured scrub vegetation along with planted turf lawn within neighboring parks. A mix of smooth to rough textures run throughout the 4.8-mile corridor composed of vegetation, trees, buildings, and roadways. The Build Alternative would be consistent with the form, line, color, and texture of the corridor.

The visual quality of the existing corridor would not be significantly altered by the Build Alternative. Vividness, or memorability, within the abandoned railway corridor is low as the Build Alternative corridor is disturbed vegetation, urban, and barren landscape. The landscape is not memorable, distinctive or diverse from other urban land cover types.

Intactness, or the lack of encroachment or eyesores, is low due to litter, debris, and miscellaneous objects scattered throughout the disturbed vegetation areas and intermixed with the urban land cover. Unity, or harmonious visual pattern, is also low due to the disturbed and urban landscapes. The Build Alternative would replace the abandoned railway corridor with a new multi-use trail. Overall, visual quality within the corridor would remain moderately-low. Vividness, intactness, and unity would also remain moderately-low due to the level of disturbance and urban development.

Resource Change (changes to visual resources as measured by changes in visual character and visual quality) would be moderate. Trees throughout the Project study area greatly contribute to the visual character and quality of the existing corridor. The Build Alternative is anticipated to require select removal of trees throughout the Project corridor, which would result in a moderate resource change; however, the Build Alternative would involve aesthetic treatments such as landscaping enhancements, educational signage, and planting trees and vegetation in select locations along the trail corridor. The Build Alternative

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 Build Alternative 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; therefore, this impact would be temporary and ultimately result in a similar visual quality. The Build Alternative 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 Build Alternative would have a less than significant impact on protected trees.

Further, the intactness and unity of the Project area would remain the same due to the disturbed vegetation and may potentially benefit from the Build Alternative, as litter and debris would be disposed of during Project implementation. This Project is not considered an adverse resource change as the Project type is consistent with the planned development in this area per the City of Sacramento General Plan (2015).

Viewers and Viewer Response

Neighbors are defined as people with views directly to the Project site, and roadway users are defined as people traveling along the adjacent road with brief views of the Project site. Viewer response can be defined as how neighbors and roadway users are anticipated to respond to changes in the visual quality of their existing environment. Viewer response is ranked using *Low*, *Moderately-Low*, *Moderate*, *Moderately-High*, and *High*. Viewers with a low response are anticipated to perceive little to no change in the quality of their visual environment, while viewers with a high response are anticipated to perceive a significant change in the quality of their visual environment.

Viewer Sensitivity

Viewer sensitivity is a measure of the viewer's recognition of a particular object, and is comprised of three attributes: activity, awareness, and local values. Activity relates to the preoccupation of the viewer. The more observant of their surroundings, the more sensitive the viewer would be to changes in visual resources. Awareness relates to the focus of view. The more specific the awareness, the more sensitive a viewer is to change. Local values and attitudes also affect viewer sensitivity. If the viewer group values aesthetics in general or if a specific visual resource has been protected by local, State, or Federal designation, it is likely that viewers would be more sensitivity due to the local interest and values in protecting the natural and historical resources of the area, including visual and aesthetic qualities. Public outreach meetings regarding the Build Alternative show there is a strong awareness of Project details and interest in how the Build Alternative would impact the local community.

Neighbors

Viewer exposure for neighbors directly adjacent to the Project area are anticipated to have a moderatelyhigh level of viewer exposure and a moderately-high level of viewer sensitivity because they live near the Project site; however, the abandoned railway corridor is situated between visual barriers (fencing, vegetation, or combination of the two) such that the majority of neighbors' views would be blocked, minimizing visual exposure and sensitivity from finished trail use or temporary construction activities. Where the existing trail corridor is elevated behind residential neighbors, these viewers' exposure and sensitivity would be moderately-high due to a more direct line of sight to the trail. Additionally, the existing berm located near Del Rio/27th Avenue and Normandy Lane would be removed for construction of the proposed trail, resulting in an increase of visibility into adjacent properties. However, in some cases, viewer sensitivity may be improved, as the Build Alternative would provide new levels of activity, awareness of recreational activity options, and access for use of alternative modes of transportation. Neighbors adjacent to the Project area would have short durations of exposure to trail users as well as short durations of temporary construction activities. Overall, the viewer response for neighbors of the Build Alternative would be moderately-high due to levels of viewer exposure and viewer sensitivity.

Roadway Users

Viewer exposure for roadway users adjacent to the trail would be low. Roadway users would only have exposure to the Project site where the trail would be visible from the roadway. Freeport Boulevard from I-5 north to Belleau Wood Lane would have a direct line of sight to the proposed trail alignment. Additionally, roadway users would have visual exposure to the trail and its users where the trail crosses roads along the 4.8-mile alignment (35th Avenue, Fruitridge Road, Del Rio Road, South Land Park Drive, and Sutterville Road). Other non-roadway users, including pedestrians, bicyclists, and other recreationalists, would also have visual exposure to the trail from use. A positive response from this user group is anticipated as the trail would provide recreational opportunities, as well as the use of other modes of transportation into the City of Sacramento. It is anticipated that the overall average response of all viewer groups to the Build Alternative would be moderate.

Visual Impact

Visual impacts are determined by assessing changes to the visual resources and predicting viewer response to those changes. Based on "Resource Change" and "Viewers and Viewers Response" discussed previously, changes to visual resources as a result of the Build Alternative are anticipated to be moderately-low. While the Build Alternative is anticipated to result in a similar visual quality to the existing corridor, impacts to visual resources would include tree removal throughout the corridor. To minimize impacts from tree removal during Project implementation, measure **AES-1** would be implemented. In addition, any aesthetic treatments and/or landscaping incorporated during final design would be designed and implemented in coordination with the City. Implementation of measure **AES-3** would also further reduce potential adverse visual impacts caused by the Build Alternative.

Temporary Impacts

Temporary impacts within the corridor would consist of temporary construction resulting in a low overall visual impact for the Build Alternative. Predominantly, temporary construction activities would take place within the abandoned railway corridor out of the line of sight for most viewers. Other viewers such as pedestrians, bicyclists, and vehicle drivers and passengers would only have short durations of visual impacts from temporary construction activities. Construction-related vehicle access and staging of construction materials would occur within already disturbed areas along the length of the Project site.

Project construction would expose nearby viewers to surfaces, produce construction debris, and introduce equipment and truck traffic. Construction vehicle access and staging of construction materials would be visible to motorists travelling in the Project vicinity. Temporary impacts due to Project construction would be short-term and would cease upon Project completion. Implementation of mitigation measure **AES-4** would further minimize visual impacts.

Level of Significance: Less than Significant with Mitigation Incorporated.

Required Mitigation: AES-1, AES-3, and AES-4.

No Project Alternative

No changes to the abandoned railway corridor would occur; therefore, there would be no impacts to aesthetic/visual resources.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact AES-4: Potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Build Alternative

The multi-use trail surface would be constructed from materials typically seen within the adjacent landscape. No substantially reflective surfaces are proposed. The Project would be designed to avoid oak trees to the greatest extent feasible; however, the Build Alternative is anticipated to require select removal of oak trees throughout the Project corridor. The number of oak trees to be removed would be determined during final design. While the elimination of large existing trees would temporarily increase glare due to removal of shade sources, new trees and vegetation would be planted and allowed to grow; therefore, this impact would be temporary and ultimately result in a similar visual quality that currently exists. To minimize impacts from oak tree removal during Project implementation, measure **AES-1** would be implemented.

The Project area is not currently lighted. Light and glare only exist from the residential streetlights adjacent to the Build Alternative area. No additional lighting is anticipated to be added along the trail; however, lighting would be installed at roadway crossings for safety. Additionally, all construction work would be conducted during the hours specified in the City ordinances; therefore, no short-term, temporary sources of nighttime lighting would be used during construction activities. With implementation of **AES-2**, impacts due to light and glare would be less than significant with mitigation incorporated.

Level of Significance: Less than Significant with Mitigation Incorporated.

Required Mitigation: AES-1 and AES-2.

No Project Alternative

Under the No Project Alternative the abandoned railway corridor would remain the same. No new lighting would be constructed and trees would not be removed; therefore, no visual impacts due to light or glare would occur.

Level of Significance: No Impact.

Required Mitigation: None Required.

Mitigation Measures

- **AES-1:** The City shall comply with City Code section 12.56.040 by establishing a replacement plan for any City trees that must be removed. The City shall replace the trees removed during project construction by replanting a minimum of 700 trees. If additional trees can be incorporated into the project design and planting plan above 700, the City shall plant additional trees where feasible. The exact number of trees and locations shall be determined during final design. The tree removal and replacement plan is subject to approval by the City Council.
- **AES-2:** Lighting design will comply with local standards in order to minimize light and glare impacts on surrounding sensitive users. Lighting fixtures will be selected to minimize light pollution into the adjacent residences and skies, while taking into account safety needs.
- **AES-3:** To minimize impacts to views of visual resources, aesthetic treatments and/or landscaping will be incorporated during final design in coordination with the City.
- **AES-4:** A Landscape Architect will design planting plans to re-vegetate exposed slopes and other disturbed soil areas.

2.2 AIR QUALITY

This section describes the regulatory and environmental setting for air quality. It also describes impacts to air quality that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal and State

Clean Air Act

The United States Environmental Protection Agency (USEPA) is responsible for addressing national and interstate air pollution issues and setting policies. The EPA sets national vehicle and stationary source emission standards, oversees approval of all State Implementation Plans, provides research and guidance for air pollution programs, and sets National Ambient Air Quality Standards (NAAQS), also known as Federal standards. There are Federal standards for the following criteria air pollutants, which were identified from provisions of the Clean Air Act of 1970:

- Ozone;
- Particulate matter (PM10 and PM2.5);
- Nitrogen dioxide;
- Carbon monoxide (CO); and
- Lead Sulfur dioxide.

Federal standards were set to protect public health, including that of sensitive individuals; thus, the standards continue to change as more medical research is available regarding the health effects of the criteria pollutants. Primary Federal standards are the levels of air quality necessary, with an adequate margin of safety, to protect the public health (California Air Resources Board [CARB] 2017).

State Implementation Plan

A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that would be followed to attain and maintain Federal standards. The State Implementation Plan for the State of California is administered by the CARB, which has overall responsibility for Statewide air quality maintenance and air pollution prevention. California's State Implementation Plan incorporates individual Federal attainment plans for regional air districts—air districts prepare their Federal attainment plans, which are sent to the CARB to be approved and incorporated into the California State Implementation Plan. Federal attainment plans include the technical foundation for understanding air quality (e.g., emission inventories and air quality monitoring), control measures and strategies, and enforcement mechanisms.

Local

Sacramento Metropolitan Air Quality Management District

The Sacramento Metropolitan Air Quality Management District (SMAQMD) is the primary agency responsible for planning to meet Federal and State ambient air quality standards in Sacramento County and the larger Sacramento Ozone Nonattainment Area.

The SMAQMD operates monitoring stations in Sacramento County, develops rules, regulations, and CEQA thresholds for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. Table 1 depicts the SMAQMD Thresholds of Significance for Projects subject to CEQA (SMAQMD 2009a).

	Construction Phase	Operational Phase	
Mass Emission Thresholds			
Nitrogen Oxide (NOx) (Ozone precursor)	85 pounds/day	65 pounds/day	
Reactive Organic Gases (ROG) (VOC) (Ozone precursor)	None.	65 pounds/day	
Particulate Matter (PM10)	Zero (0). If all feasible best available control technology (BACT) and BMPs are applied, then 80 pounds/day and 14.6 tons/year.	Zero (0). If all feasible BACT and BMPs are applied, then 80 pounds/day and 14.6 tons/year.	
Particulate Matter (PM2.5)	Zero (0). If all feasible BACT and BMPs are applied, then 82 pounds/day and 15 tons/year.	Zero (0). If all feasible BACT and BMPs are applied, then 82 pounds/day and 15	
Concentration Thresholds (Based on the California Ambient Air Quality Standard, identical threshold for both phases of development.			
Carbon Monoxide (CO)	20 ppm 1-hour standard (23 mg/m ³); 9 ppm 8-hour (10 mg/m ³)		
Nitrogen Dioxide (NO2)	0.18 ppm 1-hour standard (339 (339 μg/m³); 0.03 ppm Annual Arithmetic Mean (57 μg/m³)		
Sulphur Dioxide (SO2)	0.25 ppm 1-hour standard (665 μg/m ³); 0.04 ppm 24-hour standard (105 μg/m ³)		
Lead	1.5 μg/m³ 30-day average		
Visibility Reducing Particles	Extinction coefficient of 0.23 per kilometer - visibility of ten miles or more due to particles when relative humidity is less than 70 percent		
Sulfates	25 μg/m ³ 24-hour standard		
	0.03 ppm (42 µg/m³) 1-hour standard		
Hydrogen Sulfide (H2S)	0.00 ppm (42 µg/m		

Table 1. SMAQMD Thresholds of Significance

The SMAQMD's air quality management plans include control measures and strategies to be implemented to attain State and Federal ambient air quality standards in Sacramento County. The SMAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment. Applicable SMAQMD attainment plans include:

An 8-Hour Ozone Attainment and Reasonable Further Progress Plan and Revised 8-Hour Ozone Attainment and Reasonable Further Progress Plan.

The 2009, 8-Hour Ozone Attainment and Reasonable Further Program Plan describes measures to be implemented by the air districts in the Sacramento Federal Nonattainment Area (SFNA) to achieve the 1997 ozone NAAQS. This plan includes the information and analyses to fulfill the Federal Clean Air Act (CAA) requirements for demonstrating reasonable further progress and attainment of the 1997, 8-hour ozone NAAQS for the Sacramento region. In addition, this plan establishes an updated emissions inventory Projected for a 2019 attainment date, provides photochemical modeling results, proposes the implementation of reasonably available control measures, and sets new motor vehicle emission budgets for transportation conformity purposes for the reasonable further progress milestone years and the 2018 attainment year. The emission reduction strategy is based on reductions in both reactive organic gases (ROG) and nitrogen oxide (NOx) emissions. Future control measures include State and Federal control

strategies (e.g., smog check program improvements and cleaner heavy-duty trucks and off-road equipment), local mobile source incentive programs, Sacramento Area Council of Governments' transportation control measures, a measure to reduce biogenic volatile organic compounds (VOC) from Sacramento's urban forest, indirect source rules related to construction and operation of development Projects, and new and more stringent stationary source control rules (SMAQMD 2011).

In 2011, the air districts comprising the SFNA reviewed the 2009 Ozone Attainment Plan and concluded that certain stationary source control measures and transportation control measures would not be adopted or implemented within the time frames outlined in the plan. The air districts submitted a revision to CARB and USEPA. For the SMAQMD, the revision resulted in removal of two stationary source control measures (stationary internal combustion engines at major stationary sources and asphaltic concrete) and two indirect source review rule measures commitments, substitution of one transportation control measure (TCM) and rescheduling several stationary source measures and TCMs.

PM10 Implementation/Maintenance Plan and Redesignation Request for Sacramento County

On October 28, 2010, the SMAQMD Governing Board approved the PM10 maintenance plan and request for redesignation for the 1997 PM10 NAAQS (SMAQMD 2010a). In 2002, the USEPA officially determined that Sacramento County had attained the PM10 NAAQS by the December 31, 2000, attainment deadline. This plan fulfills the requirements for the USEPA to redesignate Sacramento County from nonattainment to attainment of the PM10 NAAQS through the following plan elements and tasks:

- Document the extent of the PM10 problem in Sacramento County;
- Determine the emission inventory sources contributing to the PM10 problem;
- Identify the appropriate control measures that achieved attainment of the PM10 NAAQS;
- Demonstrate maintenance of the PM10 NAAQS; and
- Request formal redesignation to attainment of the PM10 NAAQS (SMAQMD 2010a).

On December 7, 2010, following review of the maintenance plan and redesignation request, CARB submitted it to the USEPA for approval. The USEPA proposed redesignation of the area on July 24, 2013 and opened a public comment period for this action. Final USEPA approval of the redesignation is pending, as of this EIR.

2009 Triennial Report and Plan Revision

This plan is intended to comply with the requirements of the California Clean Air Act (CCAA) as related to bringing the region into compliance with the California Ambient Air Quality Standards (CAAQS) for ozone. The SMAQMD has prepared several triennial progress reports that build upon the 1994 Sacramento Area Regional Ozone Attainment Plan. The 2009 Triennial Report and Plan Revision (SMAQMD 2010b) is the most recent report. The triennial progress report includes a current emission inventory and Projected future inventories of ROG and NOx emissions in Sacramento County. The future inventories reflect population growth rates, travel, employment, industrial/commercial activities, and energy use, as well as controls imposed through local, State, and Federal emission reduction measures. The triennial report discusses rules that the SMAQMD has adopted during the previous three years, incentive programs that have been implemented, and other measures that would supplement those in the Ozone Attainment Plan to achieve the required five percent per year reduction required by the CCAA.

The SMAQMD also has several rules that relate to the Build Alternative, which are summarized below.

Rule 201 – General Permit Requirements: Requires any Project that includes the use of certain equipment capable of releasing emissions to the atmosphere as part of Project operation to obtain a permit from the SMAQMD prior to operation of the equipment. The applicant, developer, or operator of a Project that includes an emergency generator, boiler, or heater should contact the SMAQMD to determine if a permit is required. Portable construction equipment with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a CARB portable equipment registration.

Rule 401 – Ringelmann Chart: Prohibits individuals from discharging into the atmosphere from any single source of emissions whatsoever any air contaminant whose opacity exceeds certain specified limits.

Rule 402 – Nuisance: To protect the public health, Rule 402 prohibits any person from discharging such quantities of air contaminants that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public.

Rule 403 – Fugitive Dust: Requires a person to take every reasonable precaution not to cause or allow the emissions of fugitive dust from being airborne beyond the property line from which the emission originates, from construction, handling or storage activity, or any wrecking, excavation, grading, clearing of land or solid waste disposal operation.

Rule 453 – Cutback and Emulsified Asphalt Paving Materials: Asphalt paving operations that may be associated with implementation of a Project would be subject to Rule 453. This rule applies to the manufacture and use of cutback asphalt and emulsified asphalt for paving and maintenance operations.

Rule 902 – Asbestos: To protect the public health and the environment, Rule 902 sets specific procedures to follow regarding handling, transport, and disposal of asbestos containing materials.

The Guide to Air Quality Assessment in Sacramento County also provides methods to analyze air quality impacts from plans and Projects, including screening criteria, thresholds of significance, calculation methods, as well as mitigation measures that help assist lead agencies in complying with the CEQA. These guidelines require that basic construction emission control practices be implemented for emissions regardless of the significance determination.

The Sacramento Valley Basinwide Air Pollution Control Council

The Sacramento Valley Basinwide Air Pollution Control Council (Control Council) is authorized pursuant to California Health and Safety Code Section (HSC) section 40900 (SMAQMD 2016) to carry out the following activities relevant to the proposed Project pursuant to State Law and the CCR (reference HSC Section 41865 and Section 41866; CCR Section 80100 et seq.):

• Assist Districts in the Sacramento Valley Air Basin in coordinating all air pollution control activities to ensure that the entire Sacramento Valley Air Basin is, or will be, in compliance with the requirements of State and Federal law.

City of Sacramento 2035 General Plan (2015)

The City of Sacramento's air quality and climate change Goals and Policies are provided in the Environmental Resources (ER) Element and the Utilities (U) Element of the General Plan and are as follows:

Goal ER 6.1 Improved Air Quality. Improve the health and sustainability of the community through improved regional air quality and reduced greenhouse gas emissions that contribute to climate change.

Policy ER 6.1.2 New Development. The City shall review proposed development Projects to ensure Projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM10 and PM2.5) through Project design.

Policy ER 6.1.3 Emissions Reduction. The City shall require development Projects that exceed SMAQMD ROG and NOx operational thresholds to incorporate design or operational features that reduce emissions equal to 15 percent from the level that would be produced by an unmitigated Project.

Policy ER 6.1.4 Sensitive Uses. The City shall coordinate with SMAQMD in evaluating exposure of sensitive receptors to toxic air contaminants and will impose appropriate conditions on Projects to protect public health and safety.

Policy ER 6.1.10 Coordination with SMAQMD. The City shall coordinate with SMAQMD to ensure Projects incorporate feasible mitigation measures to reduce GHG emissions and air pollution if not already provided for through Project design.

Policy ER 6.1.14 Preference for Reduced-Emission Equipment. The City shall give preference to contractors using reduced emission equipment for City construction Projects and contracts for services (e.g., garbage collection), as well as businesses that practice sustainable operations.

Environmental Setting

Regional Setting

As mentioned in the regulatory framework above, Federal and State ambient air quality standards are set for 10 air pollutants designated in the CCAA. The Federal and State ambient air quality standards, relevant effects, properties, and sources of the pollutants are summarized in Table 2. Several pollutants are mentioned in Table 2 that do not apply to the Build Alternative and are, therefore, not further addressed in this analysis. Analysis of lead is not included because the Build Alternative would not involve lead-based materials and is not anticipated to result in emissions of lead pollutants such as aerially-deposited lead (ADL). The Build Alternative is not expected to generate or be exposed to vinyl chloride because the Build Alternative uses do not include chemical processes that create this pollutant, and there are no such uses in the Project vicinity.

Air Pollutant	Averaging Time	California Standard	Federal Standard	Most Relevant Effects from Pollutant Exposure	Properties	Sources
	1-Hour	0.09 ppm	_	Irritate respiratory system; reduce	Ozone is a photochemical	
Ozone	8-Hour	0.070 ppm	0.075 ppm	lung function; breathing pattern changes; reduction of breathing capacity; inflame and damage cells that line the lungs; make lungs more susceptible to infection; aggravate asthma; aggravate other chronic lung diseases; cause permanent lung damage; some immunological changes; increased mortality risk; vegetation and property damage.	pollutant, as it is not emitted directly into the atmosphere and is formed by a complex series of chemical reactions between VOC, NOx, and sunlight. Ozone is a regional pollutant that is generated over a large area and is transported and spread by the wind.	Ozone is a secondary pollutant; thus, it is not emitted directly into the lower level of the atmosphere. The primary sources of ozone precursors (VOC and NOx) are mobile sources (on-road and off-road vehicle exhaust).
Carbon	1-Hour	20 ppm	35 ppm	Ranges depending on exposure: slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased	CO is a colorless, odorless, toxic gas. CO is somewhat soluble in water; therefore, rainfall and fog can suppress CO conditions. CO enters	CO is produced by incomplete combustion of carbon-containing fuels (e.g., gasoline, diesel fuel, and biomass). Sources include
monoxide (CO)	8-Hour	9.0 ppm	9 ppm	exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; death.	the body through the lungs, dissolves in the blood, replaces oxygen as an attachment to hemoglobin, and reduces available oxygen in the blood.	motor vehicle exhaust, industrial processes (metals processing and chemical manufacturing), residential wood burning, and natural sources.

Table 2. Federal and State Ambient Air Quality Standards

Air Pollutant	Averaging Time	California Standard	Federal Standard	Most Relevant Effects from Pollutant Exposure	Properties	Sources		
	1-Hour		0.100 ppm	Potential to aggravate chronic respiratory	During combustion of fossil fuels, oxygen reacts with nitrogen to produce nitrogen	NOx is produced in motor vehicle internal combustion		
Nitrogen dioxide ^b (NO2)	Annual	0.030 ppm	0.053 ppm	symptoms in sensitive groups; risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; contributions to atmospheric discoloration' increased visits to hospital for respiratory illnesses.	oxides—NOx (NO, NO2, NO3, N2O, N2O3, N2O4, and N2O5). NOx is a precursor to ozone, PM10, and PM2.5 formation. NOx can react with compounds to form nitric acid and related small particles and result in PM related health effects.	engines and fossil fuel-fired electric utility and industrial boilers. Nitrogen dioxide forms quickly from NOx emissions. NO2 concentrations near major roads can be 30 to 100 percent higher than those at monitoring stations.		
	1-Hour 0.25 ppm		0.075 ppm		Sulfur dioxide is a colorless, pungent gas. At levels			
	3-Hour	—	0.5 ppm	Bronchoconstriction accompanied	greater than 0.5 ppm, the gas has a strong odor, similar to rotten eggs. Sulfur	Human caused sources include fossil-fuel combustion, mineral ore processing, and chemical manufacturing. Volcanic emissions are a natural source of sulfur dioxide. The gas can		
Quitur	24-Hour	0.04 ppm	0.14 (for certain areas)	by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma. Some population-based	oxides (SOx) include sulfur dioxide and sulfur trioxide. Sulfuric acid is formed from sulfur dioxide, which can			
Sulfur dioxide ^c (SO2)	Annual		0.030 ppm (for certain areas)	studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient sulfur dioxide levels. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor.	lead to acid deposition and can harm natural resources and materials. Although sulfur dioxide concentrations have been reduced to levels well below State and Federal standards, further reductions are desirable because sulfur dioxide is a precursor to sulfate and PM10.	also be produced in the air by dimethylsulfide and hydrogen sulfide. Sulfur dioxide is removed from the air by dissolution in water, chemical reactions, and transfer to soils and ice caps. The sulfur dioxide levels in the State are well below the maximum standards.		

Air Pollutant	Averaging Time	California Standard	Federal Standard	Most Relevant Effects from Pollutant Exposure	Properties	Sources
Particulate matter	24-hour	50 µg/m³	150 µg/m³		Suspended particulate matter is a mixture of small	Stationary sources include fuel
(PM10)	Mean	20 µg/m³	—	Short-term exposure (hours/days):	particles that consist of dry	or wood combustion for electrical utilities, residential
Particulat e	24-Hour	_	35 µg/m3	irritation of the eyes, nose, throat; coughing; phlegm; chest tightness;	solid fragments, droplets of water, or solid cores with	space heating, and industrial processes; construction and
matter (PM2.5)	Annual	12 µg/m³	12.0 µg/m³	shortness of breath; aggravate existing lung disease, causing and composition, PM10 and petrochem	shortness of breath; aggravate existing lung disease, causing	demolition; metals, minerals, and petrochemicals; wood
Visibility- reducing particles	8-Hour	See not	e below ^d	asthma attacks and acute bronchitis; those with heart disease can suffer heart attacks and arrhythmias. Long-term exposure: reduced lung function; chronic bronchitis; changes in lung morphology; death.	refers to particulate matter that is between 2.5 and 10 microns in diameter, (1 micron is one-millionth of a meter). PM2.5 refers to particulate matter that is 2.5 microns or less in diameter, about one- thirtieth the size of the average human hair.	products processing; mills and elevators used in agriculture; erosion from tilled lands; waste disposal, and recycling. Mobile or transportation related sources are from vehicle exhaust and road dust. Secondary particles form from reactions in the atmosphere.
Sulfates	24-Hour	25 µg/m³	_	Decrease in ventilatory function; aggravation of asthmatic symptoms; aggravation of cardio- pulmonary disease; vegetation damage; degradation of visibility; property damage.	The sulfate ion is a polyatomic anion with the empirical formula SO4 ²⁻ . Sulfates occur in combination with metal and/or hydrogen ions. Many sulfates are soluble in water.	Sulfates are particulates formed through the photochemical oxidation of sulfur dioxide. In California, the main source of sulfur compounds is combustion of gasoline and diesel fuel.

Air Pollutant	Averaging Time	California Standard	Federal Standard	Most Relevant Effects from Pollutant Exposure	Properties	Sources	
	30-day	1.5 µg/m³		Lead accumulates in bones, soft	Lead is a solid heavy metal that can exist in air pollution	Lead ore crushing, lead-ore	
	Quarter		1.5 µg/m³	tissue, and blood and can affect	as an aerosol particle component. Leaded	smelting, and battery manufacturing are currently the	
Lead ^e	Rolling 3- month average	_	0.15 µg/m³	the kidneys, liver, and nervous system. It can cause impairment of blood formation and nerve conduction, behavior disorders, mental retardation, neurological impairment, learning deficiencies, and low IQs.	gasoline was used in motor vehicles until around 1970. Lead concentrations have not exceeded State or Federal standards at any monitoring station since 1982.	largest sources of lead in the atmosphere in the United States. Other sources include dust from soils contaminated with lead-based paint, solid waste disposal, and crustal physical weathering.	
Vinyl chloride ^e	24-Hour	0.01 ppm		Short-term exposure to high levels of vinyl chloride in the air causes central nervous system effects, such as dizziness, drowsiness, and headaches. Epidemiological studies of occupationally exposed workers have linked vinyl chloride exposure to development of a rare cancer, liver angiosarcoma, and have suggested a relationship between exposure and lung and brain cancers.	Vinyl chloride, or chloroethene, is a chlorinated hydrocarbon and a colorless gas with a mild, sweet odor. In 1990, CARB identified vinyl chloride as a toxic air contaminant and estimated a cancer unit risk factor.	Most vinyl chloride is used to make polyvinyl chloride plastic and vinyl products, including pipes, wire and cable coatings, and packaging materials. It can be formed when plastics containing these substances are left to decompose in solid waste landfills. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites.	
Hydrogen sulfide	1-Hour	0.03 ppm	_	High levels of hydrogen sulfide can cause immediate respiratory arrest. It can irritate the eyes and respiratory tract and cause headache, nausea, vomiting, and cough. Long exposure can cause pulmonary edema.	Hydrogen sulfide (H2S) is a flammable, colorless, poisonous gas that smells like rotten eggs.	Manure, storage tanks, ponds, anaerobic lagoons, and land application sites are the primary sources of hydrogen sulfide. Anthropogenic sources include the combustion of sulfur containing fuels (oil and coal).	

Air Pollutant	Averaging Time	California Standard	Federal Standard	Most Relevant Effects from Pollutant Exposure	Properties	Sources
Volatile organic compounds (VOC)		There are no State or Federal standards for VOCs because they are not classified as criteria pollutants.		Although health-based standards have not been established for VOCs, health effects can occur from exposures to high concentrations because of interference with oxygen uptake. In general, concentrations of VOCs are suspected to cause eye, nose, and throat irritation; headaches; loss of coordination; nausea; and damage to the liver, the kidneys, and the central nervous system. Many VOCs have been classified as toxic air contaminants.	Reactive organic gases (ROGs), or VOCs, are defined as any compound of carbon—excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate—that participates in atmospheric photochemical reactions. Although there are slight differences in the definition of ROGs and VOCs, the two terms are often used interchangeably.	Indoor sources of VOCs include paints, solvents, aerosol sprays, cleansers, tobacco smoke, etc. Outdoor sources of VOCs are from combustion and fuel evaporation. A reduction in VOC emissions reduces certain chemical reactions that contribute to the formulation of ozone. VOCs are transformed into organic aerosols in the atmosphere, which contribute to higher PM10 and lower visibility.
Benzene		air quality s	no ambient tandards for zene.	Short-term (acute) exposure of high doses from inhalation of benzene may cause dizziness, drowsiness, headaches, eye irritation, skin irritation, and respiratory tract irritation, and at higher levels, loss of consciousness can occur. Long- term (chronic) occupational exposure of high doses has caused blood disorders, leukemia, and lymphatic cancer.	Benzene is a VOC. It is a clear or colorless light- yellow, volatile, highly flammable liquid with a gasoline-like odor. The EPA has classified benzene as a "Group A" carcinogen.	Benzene is emitted into the air from fuel evaporation, motor vehicle exhaust, tobacco smoke, and from burning oil and coal. Benzene is used as a solvent for paints, inks, oils, waxes, plastic, and rubber. Benzene occurs naturally in gasoline at 1 to 2 percent by volume. The primary route of human exposure is through inhalation.

	aging me	California Standard	Federal Standard	Most Relevant Effects from Pollutant Exposure	Properties	Sources
Diesel particulate (DPM)	matter	air quality s	no ambient tandards for M.	Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light-headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.	DPM is a source of PM2.5— diesel particles are typically 2.5 microns and smaller. Diesel exhaust is a complex mixture of thousands of particles and gases that is produced when an engine burns diesel fuel. Organic compounds account for 80 percent of the total particulate matter mass, which consists of compounds such as hydrocarbons and their derivatives, and polycyclic aromatic hydrocarbons and their derivatives. Fifteen polycyclic aromatic hydrocarbons are confirmed carcinogens, a number of which are found in diesel exhaust.	Diesel exhaust is a major source of ambient particulate matter pollution in urban environments. Typically, the main source of DPM is from combustion of diesel fuel in diesel-powered engines. Such engines are in on-road vehicles such as diesel trucks, off-road construction vehicles, diesel electrical generators, and various pieces of stationary construction equipment.

ppm = parts per million (concentration)

µg/m³ = micrograms per cubic meter

Annual = Annual Arithmetic Mean 30-day = 30-day average

Quarter = Calendar quarter

a Federal standard refers to the primary national ambient air quality standard, or the levels of air quality necessary, with an adequate margin of safety to protect the public health. All standards listed are primary standards except for 3 Hour SO2, which is a secondary standard. A secondary standard is the level of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant. b To attain the 1-hour nitrogen dioxide national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (0.100 ppm). c On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 175 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standards, the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

d Visibility reducing particles: In 1989, the CARB converted both the general Statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the Statewide and Lake Tahoe Air Basin standards, respectively.

e The CARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source of effects, properties, and sources: South Coast Air Quality Management District 2007a; California Environmental Protection Agency 2002; California Air Resources Board 2009; U.S. Environmental Protection Agency 2003, 2009a, 2009b, 2010, 2011a, and 2012; National Toxicology Program 2011a and 2011b. Source of standards: California Air Resources Board 2016

Toxic Air Contaminants

A toxic air contaminant (TAC) is defined as an air pollutant that may cause or contribute to an increase in mortality or serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations. The California Almanac of Emissions and Air Quality (CARB 2013) presents the relevant concentration and cancer risk data for the ten TACs that pose the most substantial health risk in California based on available data. These TACs are as follows: acetaldehyde, benzene, 1.3-butadiene, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, perchloroethylene, and DPM.

Some studies indicate that DPM poses the greatest health risk among the TACs listed above. A 10-year research program (CARB 1998) demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk. In addition to increasing the risk of lung cancer, exposure to diesel exhaust can have other health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. Diesel exhaust is a major source of fine particulate pollution as well, and studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems.

DPM differs from other TACs in that it is not a single substance but a complex mixture of hundreds of substances. Although DPM is emitted by diesel-fueled, internal combustion engines, the composition of the emissions varies, depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present. Unlike the other TACs, however, no ambient monitoring data are available for DPM because no routine measurement method currently exists. The CARB has made preliminary concentration estimates based on a DPM exposure method. This method uses the CARB emissions inventory's PM10 database, ambient PM10 monitoring data, and the results from several studies to estimate concentrations of DPM.

<u>Odors</u>

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., emotional reaction) to physiological (e.g., nausea).

With respect to odors, the human nose is the sole sensing device. The ability to detect odors is subjective and varies considerably among the population. Some individuals have the ability to smell very minute quantities of specific substances; others may not have the same sensitivity but may have sensitivities to odors of other substances. In addition, people may have different reactions to the same odor; an odor that is offensive to one person may be perfectly acceptable to another.

Local Setting

The Build Alternative is located in Sacramento County within the Sacramento Valley Air Basin (SVAB) and is under the jurisdiction of the SMAQMD. Due to the topographical and climatic factors in the SVAB, there is a potential for high concentrations of regional and local air pollutants.

The CARB emissions inventory for the Sacramento Valley Air Basin is listed in Tables 3 and 4, below. All emissions are represented in pounds per day and reflect the most current data provided to the CARB.

STATIONARY SOURCES	TOG	ROG	CO	NOx	SOx	PM	PM10	PM2.5
Fuel Combustion	24.9	3.1	41.6	29.9	1.4	2.8	2.7	2.6
Waste Disposal	97.8	1.2	0.2	0.1	0.1	0.0	0.0	0.0
Cleaning and Surface Coatings	13.9	12.0	0.0	0.0	0.0	0.0	0.0	0.0
Petroleum Production and Marketing	83.5	11.9	0.5	2.1	0.0	0.0	0.0	0.0
Industrial Processes	5.9	4.6	7.7	2.0	0.3	18.5	9.9	4.8
* TOTAL STATIONARY SOURCES	226.0	32.8	50.0	34.2	1.7	21.4	12.6	7.5
AREA-WIDE SOURCES	TOG	ROG	СО	NOx	SOx	PM	PM10	PM2.5
Solvent Evaporation	37.9	33.8	-	-	·	0.0	0.0	0.0
Miscellaneous Processes	123.9	27.2	148.3	10.0	1.1	218.0	117.4	31.5
* TOTAL AREA-WIDE SOURCES	161.9	61.0	148.3	10.0	1.1	218.0	117.4	31.5
MOBILE SOURCES	TOG	ROG	СО	NOx	SOx	РМ	PM10	PM2.5
On-Road Motor Vehicles	39.0	35.7	333.6	93.6	0.4	6.4	6.3	3.5
Other Mobile Sources	32.2	28.7	166.3	49.7	0.4	3.2	3.1	2.8
* TOTAL MOBILE SOURCES	71.2	64.4	499.9	143.2	0.8	9.6	9.4	6.3
GRAND TOTAL FOR SVAB	459.1	158.2	698.2	187.4		249.0	139.5	45.4

Table 3. 2012 Sacramento Valley Air Basin Emissions Inventory

Source: CARB 2013, Table 4 describes Sacramento County designations for the State and Federal Ambient Air Quality (CARB 2016 and EPA Green Book 2017).

Table 4 Sacramente Count	v Area Designations	s for State and Eedera	Ambient Air Quality
Table 4. Sacramento Count	y Area Designations	s for State and Federa	i Amplent Air Quality

Criteria Pollutants	State Designation	Federal Designation	
Ozone	Nonattainment	Nonattainment	
PM10	Nonattainment	Attainment	
PM2.5	Attainment	Nonattainment	
Carbon Monoxide	Moderate Attainment	Unclassified/Attainment	
Nitrogen Dioxide	Attainment	Unclassified/Attainment	
Sulfur Dioxide	Attainment	Unclassified	
Sulfates	Attainment	-	
Lead	Attainment	Unclassified/Attainment	
Hydrogen Sulfide	Unclassified	-	
Visibility Reducing Particles	Unclassified	-	

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to air quality. When an impact is determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

Methodology of Analysis

Using SMAQMD's Guide to Air Quality Assessment to screen Thresholds of Significance for criteria pollutants (as shown in Table 1, SMAQMD 2009), applicable air quality rules and regulations, and the CEQA Environmental Checklist for guidance, the following Thresholds of Significance for evaluating potential impacts were established. These thresholds are evaluated based on Project estimates from the SMAQMD Roadway Construction Emissions Model Version 8.1.0 to determine whether potential air quality impacts from the Build Alternative would be significant (Appendix E). A potential impact would be significant if the Build Alternative would:

- Construction emissions of NO_x above 85 pounds per day;
- Operational emissions of NO_x or ROG above 65 pounds per day;
- Violation of any air quality standard or contribute substantially to an existing or Projected air quality violation;
- Any increase in PM₁₀ concentrations unless all feasible Best Available Control Technology (BACT) and Best Management Practices (BMPs) have been applied then increases above 80 pounds per day or 14.6 tons per year.
- CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm); or
- Exposure of sensitive receptors to substantial pollutant concentrations.

Ambient air quality standards have not been established for toxic air contaminants (TAC). TAC exposure is deemed to be significant if:

• TAC exposures create a risk of 10 in 1 million for stationary sources, or substantially increase the risk of exposure to TACs from mobile sources.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact AIR-1: Potential to conflict with or obstruct implementation of the applicable air quality plan.

Build Alternative

As described in the regulatory framework section above, applicable air quality plans include: California State Implementation Plan; SMAQMD plans including: the 8-Hour Ozone Attainment and Reasonable Further Progress Plan and Revised 8-Hour Ozone Attainment and Reasonable Further Progress Plan; PM10 Implementation/Maintenance Plan and Redesignation Request for Sacramento County, the 2009 Triennial Report and Plan Revision, as well as the air district rules; and the Sacramento 2035 General Plan.

During construction of the Build Alternative, various types of equipment and vehicles would temporarily operate on the Build Alternative site. Construction exhaust emissions would be generated from construction equipment, earth-movement activities, construction workers' commutes, and construction material hauling for the entire construction period, posing the risk of emissions that could potentially violate set standards within an applicable air quality plan. The aforementioned activities would involve the use of diesel- and gasoline-powered equipment that would generate emissions of criteria pollutants, such as ROG and NOx, which leads to the creation of ozone emissions. Air quality modeling was performed to evaluate potential Project emissions for criteria pollutants regulated by the applicable air quality plans using Project-specific details to determine whether the Build Alternative would generate criteria air pollutant emissions in excess of levels allowed by the air quality plans. The results of the modeling of construction emissions were compared to the SMAQMD standards of significance (referenced in the Methodology of Analysis section) are summarized in Table 5.

Phase	ROGs	со	NOx	PM ₁₀	Exhaust PM ₁₀	Fugitive Dust PM₁₀
Grubbing/Land Clearing	1.43	10.05	13.31	3.09	0.59	2.50
Grading/Excavation	6.08	48.49	65.30	5.63	3.13	2.50
Drainage/Utilities/Sub-Grad	5.09	41.61	49.30	4.93	2.43	2.50
Paving	2.16	20.55	19.01	1.13	1.13	-
Maximum (pound/day)	6.08	48.49	65.30	5.63	3.13	2.50
Total (tons/construction Project)	0.31	2.51	3.14	0.29	0.15	0.14

Source: Road Construction Emissions Model, Version 8.1.0

Based on the modeling results, estimated unmitigated emissions from the Build Alternative would not exceed the thresholds established for key criteria pollutants in the SMAQMD air quality planning documents. Although the Build Alternative would temporarily cause localized increases in emission levels, the Project would be less than the SMAQMD thresholds of significance for all criteria pollutants. Because construction and operational emissions are expected to be well below the thresholds, the Build Alternative is not expected to violate any air quality standards. The Build Alternative consists of constructing a multiuse trail and would not increase the capacity of a roadway; therefore, no additional trips or delays are expected to result from the Build Alternative. The Build Alternative would not exceed the threshold for NOx (85 lbs/day).

SMAQMD has established screen-level criteria for the assessment of significant impacts from constructionrelated emissions of fugitive dust. These criteria are based on a Project's maximum actively disturbed area. Construction activities that would disturb less than 15.0 acres per day would be required to implement the appropriate level of mitigation, identified by the SMAQMD as "Basic Construction Emission Control Practices," for all Projects to further minimize construction-related impacts regardless of the CEQA significance determination. Best management practices (BMPs) have been included from the "Basic Construction Emission Control Practices" to reduce construction-related emissions of fugitive dust. See Question A for the City Code: 15.40.050 and 15.44.170; SMAQMD Rule 403 (Fugitive Dust) and their Basic Construction Emissions Control Practices. Based on the factors presented above, the Build Alternative would be consistent with the goals of the SMAQMD through the implementation of AIR-1. Therefore, impacts are less than significant with mitigation incorporated.

Level of Significance: Less than Significant with Mitigation Incorporated.

Mitigation Required: AIR-1.

No Project Alternative

The multi-use trail would not be constructed; therefore, no change in the existing condition would occur and there would be no conflict with or obstruct implementation of the applicable air quality plan.

Level of Significance: No Impact.

Mitigation Required: None.

Impact AIR-2: Potential to violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Build Alternative

In order to assess the Build Alternative's potential to contribute to an existing or Projected air quality violation, localized criteria pollutant emissions were analyzed since these are the pollutants with established ambient air quality standards. Particulate matter emissions, primarily PM10, are of concern during construction because of potential fugitive dust emissions during earth-disturbing activities and result in localized pollutant concentrations. The SMAQMD has not established significance thresholds specifically for fugitive dust emissions but has adopted a threshold for total PM10 of 80 lbs/day (see

Table 5, above) when applicable BMPs included in **AIR-1** are implemented. This threshold includes emissions from both fugitive dust and PM emissions from vehicles. All PM10 emission estimates for the Build Alternative were below the SMAQMD significance thresholds (see Table 5, above). However, to ensure that localized PM emissions do not contribute significantly to the existing State exceedance of PM10, **AIR-1** would include the preparation of a Construction Emissions and Dust Control Plan to mitigate for emissions generated during construction activities by limiting the amount of fugitive dust generated. Operation activities would be similar to existing conditions; therefore, no long-term impacts to air quality or violations of air quality standards would occur. Potential impacts to air quality standards or contributions to an existing or Projected air quality violation are considered less than significant with **AIR-1** incorporated.

Level of Significance: Less than Significant with Mitigation Incorporated.

Mitigation Required: AIR-1.

No Project Alternative

The multi-use trail would not be constructed; therefore, there would be no potential for this alternative to violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Level of Significance: No Impact.

Mitigation Required: None.

Impact AIR-3: Potential to result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Build Alternative

The Build Alternative would have short-term impacts resulting from the following construction-related sources: 1) construction and demolition equipment emissions; and 2) dust from construction operations.

As shown in Table 6, the Build Alternative is located in a nonattainment area for 1-hour Ozone for State standards, nonattainment area for 8-hour Ozone for both Federal and State standards, and nonattainment area for Particulate Matter under 2.5 micrometers for Federal standards and State standards.

Criteria Dellutent	Attainme	ent Status
Criteria Pollutant	Federal	State
O ₃ – 1-hour	N/A	Nonattainment - Serious
O ₃ – 8-hour	Nonattainment	Nonattainment
PM10	Nonattainment	Nonattainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Unclassified/Attainment	Attainment
NO ₂	Unclassified/Attainment	Attainment
SO ₂	Unclassified	Attainment
Sulfates	N/A	Attainment
Lead	Attainment	Attainment
Hydrogen Sulfide	N/A	Unclassified
Visibility Reducing Particles	N/A	Unclassified

Table 6. Attainment at Project Location

Source: California Air Resources Board (2017)

Temporary/Construction Impacts

During construction, short-term degradation of air quality may occur due to the release of particulate emissions (airborne dust) generated by excavation, grading, hauling, and other activities related to

construction. Emissions from construction equipment also are anticipated and would include CO, NO_x, volatile organic compounds (VOCs), directly-emitted particulate matter (PM₁₀ and PM_{2.5}), and toxic air contaminants such as diesel exhaust particulate matter. Ozone is a regional pollutant that is derived from NOx and VOCs in the presence of sunlight and heat.

Heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO₂, NOx, VOCs and some soot particulate (PM₁₀ and PM_{2.5}) in exhaust emissions. If construction activities were to increase traffic congestion in the Project area, CO and other emissions from traffic would increase slightly while those vehicles are delayed. These emissions would be temporary and limited to the immediate area surrounding the construction site and detour area. The estimated construction related emissions of NOx is 61.43 lbs/day, which is well under the 85 lbs/day threshold (see Appendix E for the Air Quality Model Results).

Dust generated will result in a temporary, local impact, limited to areas of construction. Dust control practices will be incorporated into the Build Alternative to mitigate this potential impact. The dust control practices will comply with the current City Codes: 15.40.050 and 15.44.170; SMAQMD Rule 403 (Fugitive Dust) and their Basic Construction Emissions Control Practices. The general requirements of Rule 403 are:

301 Limitations: A person shall take every reasonable precaution not to cause or allow the emissions of fugitive dust from being airborne beyond the property line from which the emission originates, from any construction, handling or storage activity, or any wrecking, excavation, grading, clearing of land or solid waste disposal operation. Reasonable precautions shall include, but are not limited to:

301.1 Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the construction of roadways or the clearing of land.

301.2 Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts; and

301.3 Other means approved by the Air Pollution Control Officer.

To further reduce temporary Project-specific impacts, implementation of AIR-1 and AIR-2 would occur.

Permanent Impacts

The Build Alternative will not change traffic volumes within or adjacent to the Project area; therefore, no permanent impacts related to air quality will occur.

Level of Significance: Less than Significant with Mitigation Incorporated.

Mitigation Required: AIR-1 and AIR-2.

No Project Alternative

The multi-use trail would not be constructed; therefore, there would be no potential for this alternative to result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Level of Significance: No Impact.

Mitigation Required: None.

Impact AIR-4: Potential to expose sensitive receptors to substantial pollutant concentrations.

Build Alternative

Although the nearest sensitive receptor is located approximately 30 feet from the Project area, construction activities, which involve the use of diesel-powered equipment, are short-term and emissions are expected to be well below the thresholds. Operational emissions are not expected to increase, as discussed for

Impact **AIR-c**. Despite a low-impact expectation for this Project, measures for construction activities are still recommended to further reduce impacts on sensitive receptors.

SMAQMD defines sensitive receptors as facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants or may experience adverse effects from unhealthful concentrations of air pollutants. Hospitals, clinics, schools, convalescent facilities, and residential areas are examples of sensitive receptors. The nearest sensitive receptors in the vicinity of the Project site are residences, schools, and daycares approximately 30 feet from the trail throughout the 4.8-mile corridor.

Construction activities are anticipated to involve the operation of diesel-powered equipment. In 1998, the CARB identified diesel exhaust as a TAC. Cancer health risks associated with exposures to diesel exhaust typically are associated with chronic exposure, in which a 70-year exposure period often is assumed. Although elevated cancer rates can result from exposure periods of less than 70 years, acute exposure (i.e., exposure periods of 2 to 3 years) to diesel exhaust typically are not anticipated to result in an increased health risk because acute exposure typically does not result in exposure concentrations that would represent a health risk. Health impacts associated with exposure to diesel exhaust from Project construction are anticipated to be less than significant because construction activities are expected to occur well below the 70-year exposure period used in health risk assessments. Additionally, emissions would be short-term and intermittent in nature, and therefore would not generate TAC emissions at high enough exposure concentrations to represent a health hazard. Therefore, construction of the Build Alternative is not anticipated to result in an elevated cancer risk to exposed persons. Odors from construction may occur during activities such as laying pavement; however, these activities would be intermittent and short-term in nature; therefore, potential effects related to air quality and odors would be less than significant. To further reduce temporary Project-specific impacts, implementation of AIR-1 and AIR-2 would occur.

Asbestos

A review of information available through United States Geological Survey (USGS) indicated that the nearest ultramafic rock formation potentially associated with naturally occurring asbestos (NOA) is approximately 23 miles northeast of the Project area, along the eastern banks of Folsom Lake (USGS 2015).

Observations made during the site reconnaissance indicate that the Build Alternative area is composed of unpainted concrete and/or asphalt, bare earth, gravel, and vegetation; therefore, analysis for lead-containing structures prior to construction is not warranted.

Level of Significance: Less than Significant with Mitigation Incorporated.

Mitigation Required: AIR-1 and AIR-2.

No Project Alternative

The multi-use trail would not be constructed; therefore, there would be no potential for this alternative to expose sensitive receptors to substantial pollutant concentrations.

Level of Significance: No Impact.

Mitigation Required: None.

Impact AIR-5: Potential to create objectionable odors affecting a substantial number of people.

Build Alternative

While offensive odors rarely cause any physical harm, they can still be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and the SMAQMD. The occurrence and severity of odor impacts depends on numerous factors, including the nature, frequency, and intensity of the source, the design and ability for noxious odors to be generated in the first place, the wind speed and direction, and the sensitivity of the receptor. The nearest sensitive

receptors in the vicinity of the Project site who could be affected by odors are residences, schools, and daycares approximately 30 feet from the Build Alternative area.

Diesel fumes from construction equipment are often found to be objectionable; however, operation of diesel equipment on site is short term and intermittent and construction is temporary. Operation of diesel equipment would comply with Federal, State, and local regulations, including with all applicable SMAQMD rules and regulations as part of the construction specifications, which would limit construction-related odorous emissions. Therefore, construction of the Build Alternative would not be expected to create objectionable odors affecting a substantial number of people and would have a less than significant impact.

Level of Significance: Less than Significant.

Mitigation Required: None Required.

No Project Alternative

The multi-use trail would not be constructed; therefore, there would be no potential for this alternative to create objectionable odors.

Level of Significance: No Impact.

Mitigation Required: None.

Mitigation Measures

AIR-1: Sacramento Metropolitan Air Quality Management District's Rule 403 - Fugitive Dust would be followed. The general requirements of Rule 403 are: 301 Limitations: -301 Limitations: A person shall take every reasonable precaution not to cause or allow the emissions of fugitive dust from being airborne beyond the property line from which the emission originates, from any construction, handling or storage activity, or any wrecking, excavation, grading, clearing of land or solid waste disposal operation. Reasonable precautions shall include, but are not limited to:

- **301.1** Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the construction of roadways or the clearing of land.
- **301.2** Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts; and
- **301.3** Other means approved by the Air Pollution Control Officer.

AIR-2: Basic Construction Emission Control Practices – California regulations limit idling from both on-road and off-road diesel-powered equipment. The California Air Resources Board enforces the idling limitations. The following practices describe exhaust emission control from diesel powered fleets working at a construction site:

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to five minutes [required by CCR, Title 13, Sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site. Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

2.3 BIOLOGICAL RESOURCES

This section describes the environmental and regulatory setting for biological resources. It also describes impacts on biological resources that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

There are Federal, State, County of Sacramento (County), and City requirements for the protection of plant and wildlife species, their habitats, and other biological resources. The regulatory setting outlines the laws and regulations relevant to the Build Alternative.

Federal

Clean Water Act: Section 401

The United States Environmental Protection Agency (USEPA) regulates surface water quality in Waters of the United States (WOTUS) under Section 401 of the State Clean Water Act (CWA). CWA Section 401 Water Quality Certification (WQC) provides states and authorized tribes with an effective tool to help protect the physical, chemical, and biological integrity of water quality, by providing them an opportunity to address the aquatic resource impacts of federally issued permits and licenses. CWA 401 compliance is required for any Project that produces a federal action with construction that could have an impact to surface water quality (USEPA 2017).

Clean Water Act: Section 404

CWA Section 404 regulates the discharge of dredged and fill materials into waters of the United States. Waters of the United States refers to oceans, bays, rivers, streams, lakes, ponds, and wetlands, including any or all of the following: areas within ordinary high water mark of a stream, including non-perennial streams with a defined bed and bank and any stream channel that conveys natural runoff, even if it has been realigned; and seasonal and perennial wetlands, including coastal wetlands. If a Project discharges any fill materials into WOTUS, including wetlands, before and after the Project actions, then a CWA 404 compliance must be met with the USACE.

Endangered Species Act of 1973

The Federal Endangered Species Act (FESA) was passed by Congress in 1973 to protect and recover imperiled species and the habitat upon which they depend. The FESA is administered by the United States Fish and Wildlife Service (USFWS). Under the FESA, protected species are either listed as "endangered", in danger of extinction throughout all or a significant region of the species range; or as "threatened", likely to become endangered within the near future (USFWS 2015). "Take" is to hunt, pursue, catch, capture, or kill; or attempt to hunt, pursue, catch, capture, or kill an endangered or threatened species. The FESA also designates "candidate" species as those plants and animals that the USFWS 2015).

The FESA mandates the protection of Federally listed species and the habitats which they depend (50 CFR 17.12 for listed plants, 50 CFR 17.11 for listed animals, and various notices in the Federal Register for proposed species) (LII 2017b). Consultation with the USFWS would be necessary if a proposed project has the potential to affect federally listed species, as well as suitable habitat for those species. This consultation would proceed under Section 7 of the FESA if a Federal action is part of the proposed project or through Section 10 of the FESA if no such nexus were available (USFWS 2015).

Migratory Bird Treaty Act of 1918 and Bald and Gold Eagle Protection Act

The Migratory Bird Treaty Act (MBTA) (16 U.S. Code [USC] Section 703-711) and the Bald and Golden Eagle Protection Act (BAGEPA) (16 USC Section 668) protect specific species of birds and prohibits "take" (i.e., harm or harassment) (LII 2017a). The MBTA protects migrant bird species from "take" through setting hunting limits and seasons and protecting occupied nests and eggs (USFWS 2017b). BAGEPA prohibits the take or commerce of any part of the bald or golden eagle (USFWS 2017b). The USFWS administers both acts and reviews actions that may affect species protected under each act.

State

California Endangered Species Act

The California Endangered Species Act (CESA) prohibits "take" of State listed threatened or endangered species under sections of the California Department of Fish and Game (CDFG) Code 2050-2116. The California Department of Fish and Wildlife (CDFW) has jurisdiction over these protected plant and wildlife species listed as threatened or endangered under section 2080 of the CDFG Code. The CESA differs from the FESA in that it does not include habitat destruction in its definition of "take". CDFW defines "take" as "...hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." CDFW may authorize "take" under the CESA through Section 2081 of the CDFG Code. If the results of a biological survey indicate that a state-listed species could be affected by a proposed project, then under Section 2081, CDFW could authorize take of species listed as endangered, threatened, candidate, or a rare plant, if that take is incidental to otherwise lawful activities and if certain conditions are met (CDFW 2017a). In addition to listed Threatened or Endangered species CDFW maintains lists for Candidate Endangered Species and Candidate Threatened species that are afforded the same level of protection as listed species.

California Environmental Quality Act Guidelines: Section 15380

Pursuant to CEQA Guidelines Section 15380, CEQA provides protection for Federal and/or State listed species, as well as species not listed Federally or by the State that may be considered rare, threatened, or endangered. Accordingly, "A species not included in any listing identified in subdivision (c) [FESA and CESA listed species] shall nevertheless be considered to be endangered, rare or threatened, if the species can be shown to meet the criteria in subdivision (b)" (CEQA Guidelines section 15380(d)). Subdivision (b) states, "A species of animal or plant is:

- 1) 'Endangered' when its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors; or
- 2) 'Rare' when either:
 - a. Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or
 - b. The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the Federal Endangered Species Act" (CEQA Guid
 - c. elines 15380(b)).
 - d. Indicates that species of special concern should be included in an analysis of Project impacts if they can be shown to meet the criteria of sensitivity outlined therein.

The CDFW designates Species of Special Concern (SSC) as wildlife and plant species of limited distribution, declining populations, diminishing habitat, or unusual scientific, recreational, and/or educational values qualifying SSC as "special status species" meeting the criteria under subdivision (b) of section 15380 of the CEQA Guidelines. Plants appearing on California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) as well as species considered rare or protected under other applicable list are also considered to meet CEQA's Section 15380 criteria.

For the purposes of this EIR, the following parameters define "special-status species":

- Plant and Wildlife species listed, or proposed for listing, as threatened, or endangered under the FESA (50 CFR 17.12 for listed plants, 50 CFR 17.11 for listed animals, and various notices in the Federal Register for proposed species);
- Plant and wildlife species that are listed or proposed for listing by the State as threatened or endangered under the CESA (14 CCR 670.5);
- Plant and wildlife species that meet the definitions of "rare" or "endangered" under CEQA Guidelines, Section 15380;
- Plant and wildlife species that are designated as "special animals" or "those of greatest conservation need", by CDFW through the California Natural Diversity Database (CNDDB);
- Wildlife Species of Special Concern to CDFW;

- Wildlife listed as "Fully Protected" in California under the CDFG Code;
- Plants listed as rare under the State Native Plant Protection Act (NPPA) of 1977 (CDFG Code 1900 et seq.);
- Plants considered by the CNPS to be Rank 1A- "plants presumed extirpated in California and either rare or extinct elsewhere", or Rank 1B- "rare, threatened, or endangered in California and elsewhere";
- Plants considered by CNPS to be a Rank 2A- Plants presumed extirpated in California, but common elsewhere", or Rank 2B- "rare, threatened, or endangered in California and common elsewhere";
- Plants considered by CNPS to be a Rank 3- "plants about which more information is needed" and cannot be yet be excluded from review"; and
- Plants considered by CNPS to be a Rank 4- "plants with limited distribution".

The CEQA provision enables an agency to protect a species from potential significant Project impacts until the respective government agencies have had an opportunity to list the species as protected, if warranted (CDFW 2017b). To asses "impact significance" to populations of non-listed species as well as listed species CDFW recommends population-level effects, proportion of the taxon's range affected by a Project, regional effects, and impacts to habitat features are all considered (CDFW 2017b).

Native Plant Protection Act: California Department of Fish and Game Code Section 1900 et seq.

The NPPA was enacted in 1977 and is administered by CDFW (CDFG Code, Section 1900 et seq.). The NPPA prohibits "take" of endangered, threatened, or rare plant species native to the State, with the exception of special criteria identified in the NPPA CDFG Code. A "native plant" means a plant growing in a wild uncultivated state which is normally found native to the plant life of the state. "Rare" species can be defined as species that are: broadly distributed but never abundant where found, narrowly distributed, or clumped yet abundant where found, and/or narrowly distributed or clumped and not abundant where found. If potential impacts are identified for a proposed project activity, then consultation with CDFW, permitting, and/or other mitigation may be required (CNPS 2017a).

Nesting Migratory Birds and Raptors: California Department of Fish and Game Code Sections 3503, 3503.5, and 3800

Nesting migratory birds and raptors are protected under CDFG Code, Sections 3503, 3503.5, and 3800; which prohibit the "take", possession, or destruction of birds, their nests, or eggs. Implementation of "take" provisions require that any potential Project-related disturbance, within active nesting territories, be reduced or eliminated during critical phases of the nesting cycle (i.e., approximately February 15 through August 31). Disturbance that causes nest abandonment and/or loss of reproductive effort (e.g., killing or abandonment of eggs or young), or the loss of habitat upon which birds are dependent, is considered "taking", and is potentially punishable by fines and/or imprisonment (CLI 2017). Such taking would also violate federal law protecting migratory birds under the MBTA.

Other California Tree Protection Regulations

Additional State laws that regulate and/or protect oaks, oak woodlands, and other tree species include: the Professional Forester's Law (PFL); the CEQA; and the State BFFP. PFL addresses oak habitat evaluations. CEQA addresses that "[a city] ... shall determine whether a Project within its authority may result in a conversion of oak woodland that will have a significant effect on the environment." CEQA also provides protection to federal and/or State tree species that may be considered special-status. Thus, both PFL and CEQA apply to all local jurisdictions. The BFFP has regulatory authority over all of California's forested landscapes, including the authority to regulate oak woodlands at the State or local level.

Porter-Cologne Water Quality Control Act: California Department of Fish and Game Code Section 1601-1602

The Porter-Cologne Water Quality Act, CDFG Code sections 1601-1607, is administered by the California State Water Resources Control Board (SWRCB). This act and associated codes pertain to Projects with potential impacts to water quality or waterways (SWRCB 2017).

Local

City of Sacramento Tree Ordinance: Sacramento City Code 12.56

The City has adopted regulatory policies for the preservation, protection, and maintenance of the existing trees within the City. Sacramento City Code (CC) 12.56 was amended and adopted by the City Council on August 4, 2016.

Work on and/or the removal of City trees or private protected trees requires prior approval in the form of a City of Sacramento Tree Permit (City Tree Permit). City trees are characterized as trees partially or completely located in a City park, on City owned property, or on a public right-of-way, including any street, road, sidewalk, park strip, mow strip or alley. For City trees located within City Park, the Director of the City Youth, Parks & Community Enrichment Department handles approvals for tree removal. For all other City trees located on City property or within the ROW, the City Director of Public Works handles approvals. CC section 12.56.040 includes specific requirements for notice and hearing for removal of City trees.

Private protected trees are defined as trees designated to have special historical value, special environmental value, or significant community benefit, and are located on private property. In addition, private protected trees include: 1) native trees at 12 inches DSH (i.e., coast live, interior, valley and blue oaks [*Quercus* spp.], California sycamore [*Platanus racemose*], and buckeye [*Aesculus californica*]); 2) all trees at 32 inches DSH with an existing single family or duplex dwelling; and 3) all trees at 24 inches DSH on undeveloped land or any other type of property such as commercial, industrial, and apartments (City of Sacramento 2017b).

<u>City of Sacramento Tree Ordinance: Sacramento City Code 12.56.040 Removal of City Trees—Public</u> <u>Projects</u>

Whenever feasible, the City shall modify the design of public projects to avoid the removal or damage to City trees.

If the City proposes to remove City trees that have a DSH of four inches or more as part of a public project that otherwise requires City council approval, the City project manager shall provide written justification to the director of the need to remove City trees for the public project. The director shall review the written justification and if the director agrees with the written justification the director shall make a recommendation to the City council to approve the request to remove the City trees. The request for approval from City council may take place at any stage of the public project but the City shall obtain council approval prior to removing the City trees. City trees proposed to be removed as part of a public project that either does not require City council approval or has a DSH less than four inches shall be removed as provided in Section 12.56.030(C).

The director shall provide written notice of the proposal to remove City trees as part of a public project by posting a notice of the time, date, and location of the City council meeting during which the City council is to decide whether or not to remove City trees in a conspicuous place on or in proximity to the trees at least fifteen (15) days prior to the City council meeting (Ord. 2016-0026 § 4).

City of Sacramento 2035 General Plan (2015)

The City of Sacramento's biological resources goals and policies are set forth in the Environmental Resources (ER) Element the General Plan and are as follows:

Goal ER 2.1. Natural and Open Space Protection. Protect and enhance open space, natural areas, and significant wildlife and vegetation in the City as integral parts of a sustainable environment within a larger regional ecosystem.

Policy ER 2.1.1. **Resource Preservation.** The City shall encourage new development to preserve on-site natural elements that contribute to the community's native plant and wildlife species value and to its aesthetic character.

Policy ER 2.1.4 Retain Habitat Areas. The City shall retain plant and wildlife habitat areas where there are known sensitive resources (e.g., sensitive habitats, special-status, threatened, endangered, candidate species, and species of concern). Particular attention shall be focused on retaining habitat areas that are contiguous with other existing natural areas and/or wildlife movement corridors.

ER 2.1.5 - Riparian Habitat Integrity. The City shall preserve the ecological integrity of creek corridors, canals, and drainage ditches that support riparian resources by preserving native plants and, to the extent feasible, removing invasive, non-native plants. If not feasible, adverse impacts on riparian habitat shall be mitigated by the preservation and/or restoration of this habitat at a 1:1 ratio, in perpetuity.

ER 2.1.6 – Wetland Protection. The City shall preserve and protect wetland resources including creeks, rivers, ponds, marshes, vernal pools, and other seasonal wetland, to the extent feasible. If not feasible, the mitigation of all adverse impacts on wetland resources shall be required in compliance with State and Federal regulations protecting wetland resources, and if applicable, threatened or endangered species. Additionally, the City may require either on- or off-site permanent preservation of an equivalent amount of wetland habitat to ensure no-net-loss of value and/or function.

Policy ER 2.1.8 Oak Woodlands. The City shall preserve and protect oak woodlands, heritage oaks, and/or significant stands of oak trees in the city that provide habitat for common native, and special status wildlife species, and shall address all adverse impacts on oak woodlands in accordance with the City's Heritage Tree Ordinance.

Policy ER 2.1.10 Habitat Assessments. The City shall consider the potential impact on sensitive plants and wildlife for each Project requiring discretionary approval. If site conditions are such that potential habitat for sensitive plant and/or wildlife species may be present, the City shall require habitat assessments, prepared by a qualified biologist, for sensitive plant and wildlife species. If the habitat assessment determines that suitable habitat for sensitive plant and/or wildlife species is present, then either (1) protocol-level surveys shall be conducted (where survey protocol has been established by a resource agency), or, in the absence of established survey protocol, a focused survey shall be conducted consistent with industry-recognized best practices; or (2) suitable habitat and presence of the species shall be assumed to occur within all potential habitat locations identified on the Project site. Survey Reports shall be prepared and submitted to the City and the CDFW or the USFWS (depending on the species) for further consultation and development of avoidance and/ or mitigation measures consistent with State and Federal law.

Goal ER. 3.1. Urban Forest. Manage the City's urban forest as an environmental, economic, and aesthetic resource to improve Sacramento residents' quality of life.

Policy ER 3.1.2 Manage and Enhance the City's Tree Canopy. The City shall continue to plant new trees, ensure new developments have sufficient right-of-way width for tree plantings, manage and care for all publicly owned trees, and work to retain healthy trees. The City shall monitor, evaluate and report, by community plan area and City-wide, on the entire tree canopy in order to maintain and enhance trees throughout the City and to identify opportunities for new plantings.

Policy ER 3.1.3 Trees of Significance. The City shall require the retention of City trees and Heritage Trees by promoting stewardship of such trees and ensuring that the design of development Projects provides for the retention of these trees wherever possible. Where tree removal cannot be avoided, the City shall require tree replacement or appropriate remediation.

Environmental Setting

The Project's Biological Study Area (BSA) is approximately 249 acres in size, and elevations within the BSA range between 5 and 40 feet above mean sea level. The topography within the BSA is very flat. Soils within the BSA include (NRCS 2017):

- Dierssen clay loam, deep drained, 0 to 2 percent slopes;
- Egbert clay, partially drained, 0 to 2 percent slopes;
- Egbert-Urban land complex, partially drained, 0 to 2 percent slopes;
- Galt clay, 0 to 1 percent slopes, MLRA 17;
- Galt-Urban land complex, 0 to 1 percent slopes, MLRA 17;
- Kimball-Urban land complex, 0 to 2 percent slopes,;
- Lang-Urban land complex, 0 to 2 percent slopes;
- San Joaquin silt loam, 0 to 3 percent slopes;

- San Joaquin-Urban land complex, 0 to 2 percent slopes;
- Trinnin-Urban land complex, 2 to 8 percent slopes;
- Valpac loam, partially drained, 0 to 2 percent slopes;
- Valpac-Urban land complex, partially drained, 0 to 2 percent slopes; and
- Xerarents-San Joaquin complex, 0 to 1 percent slopes.

The Project area is within a highly disturbed urban area. 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 within the BSA include mixed willow scrub, drainage, depressional wetland and small portions of valley foothill riparian where the Project area borders the Sacramento River (Figure 14: Vegetation Communities and Waters within the BSA). Biological surveys were conducted on May 12, and May 17, 2017 by Dokken Engineering biologists Angela Scudiere and Courtney Owens to document existing biological resources, detect potential jurisdictional waters of the U.S. and State, and search for suitable habitat and presence of Federal and State special-species within the BSA. Potential impacts to resources were analyzed based on the Build Alternative design and ecological resources identified in the field surveys. In compliance with the provisions of Federal, State, and local plans, policies, and laws relevant to the Build Alternative, the potential impacts to natural resources within the BSA were investigated and documented.

Prior to field work, literature research was conducted through the USFWS Species List, the CDFWmaintained CNDDB, and the CNPS Electronic Inventory of Rare and Endangered Plants to identify habitats and special status species having the potential to occur within the BSA (CNDDB 2017; CNPS 2017; USFWS 2017b; and NMFS 2017) (see Appendix F).

Special Status Species

Special status species are plants and animals in the following categories:

- Plant and Wildlife species listed, or proposed for listing, as threatened, or endangered under the FESA (50 CFR 17.12 for listed plants, 50 CFR 17.11 for listed animals, and various notices in the Federal Register for proposed species);
- Plant and wildlife species that are listed or proposed for listing by the State as threatened or endangered under the CESA (14 CCR 670.5);
- Plant and wildlife species that meet the definitions of "rare" or "endangered" under CEQA Guidelines, Section 15380;
- Plant and wildlife species that are designated as "special animals" or "those of greatest conservation need", by CDFW through the California Natural Diversity Database (CNDDB);
- Wildlife Species of Special Concern to CDFW;
- Wildlife listed as "Fully Protected" in California under the CDFG Code;
- Plants listed as rare under the State Native Plant Protection Act (NPPA) of 1977 (CDFG Code 1900 et seq.);
- Plants considered by the CNPS to be Rank 1A- "plants presumed extirpated in California and either rare or extinct elsewhere", or Rank 1B- "rare, threatened, or endangered in California and elsewhere";
- Plants considered by CNPS to be a Rank 2A- Plants presumed extirpated in California, but common elsewhere", or Rank 2B- "rare, threatened, or endangered in California and common elsewhere";
- Plants considered by CNPS to be a Rank 3- "plants about which more information is needed" and cannot be yet be excluded from review"; and
- Plants considered by CNPS to be a Rank 4- "plants with limited distribution".

The CNDDB, maintained by the CDFW, is considered the most current and reliable tool for tracking occurrences of special status species in California.

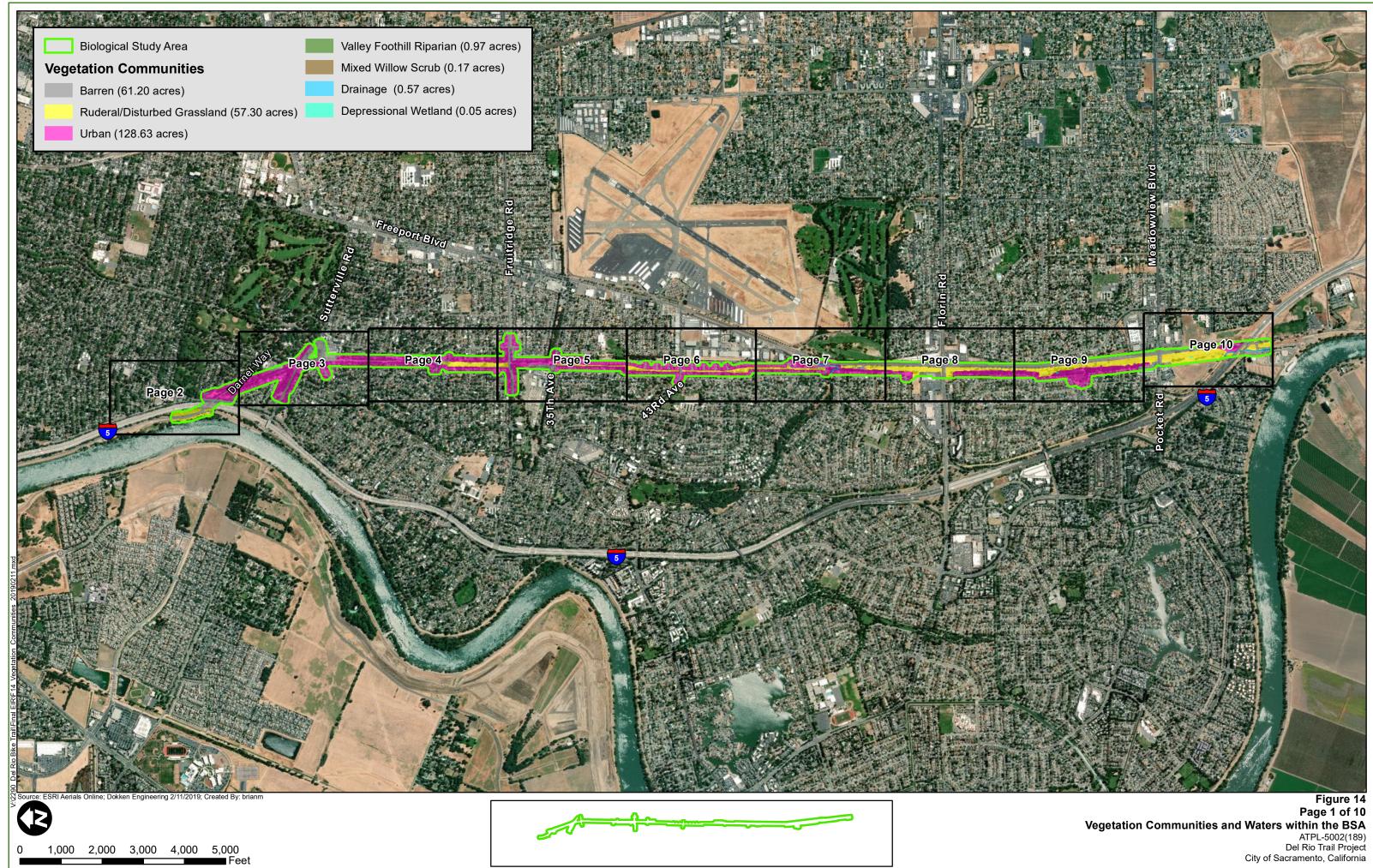
Special Status Species Evaluation

The special status species evaluation considers those species identified as having relative scarcity and/or declining populations by the USFWS or CDFW. Special status species include those formally listed as threatened or endangered, those proposed for formal listing, candidates for Federal listing, and those classified as Species of Concern by USFWS or SSC by CDFW. Species considered to be "special animals" or "fully protected" by the CDFW or rare, threatened, or endangered in California by the CNPS were also included in the evaluation.

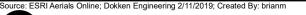
Setting and Methods

Queries of the USFWS Planning Species list, CNDDB Electronic Inventory of Rare and Endangered Plants, and CNPS database queries identified several special status species with the potential to be impacted by the Build Alternative. Field surveys were conducted in May 2017 to document existing biological resources, detect potential jurisdictional waters of the U.S. and State, and search for suitable habitat and presence of Federal and State special-species. Potential impacts to resources were analyzed based on the Build Alternative design and ecological resources identified in the field surveys. Table 7 provides a summary of all species identified in the search results, a description of the habitat requirements for each species, and conclusions regarding the potential for each species to occur within the Project area.

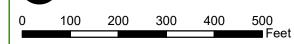
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Santa Buena Way





Verside Blvd

E Park Rd





Figure 14 Page 2 of 10 Vegetation Communities and Waters within the BSA ATPL-5002(189) Del Rio Trail Project City of Sacramento, California



City of Sacramento, California

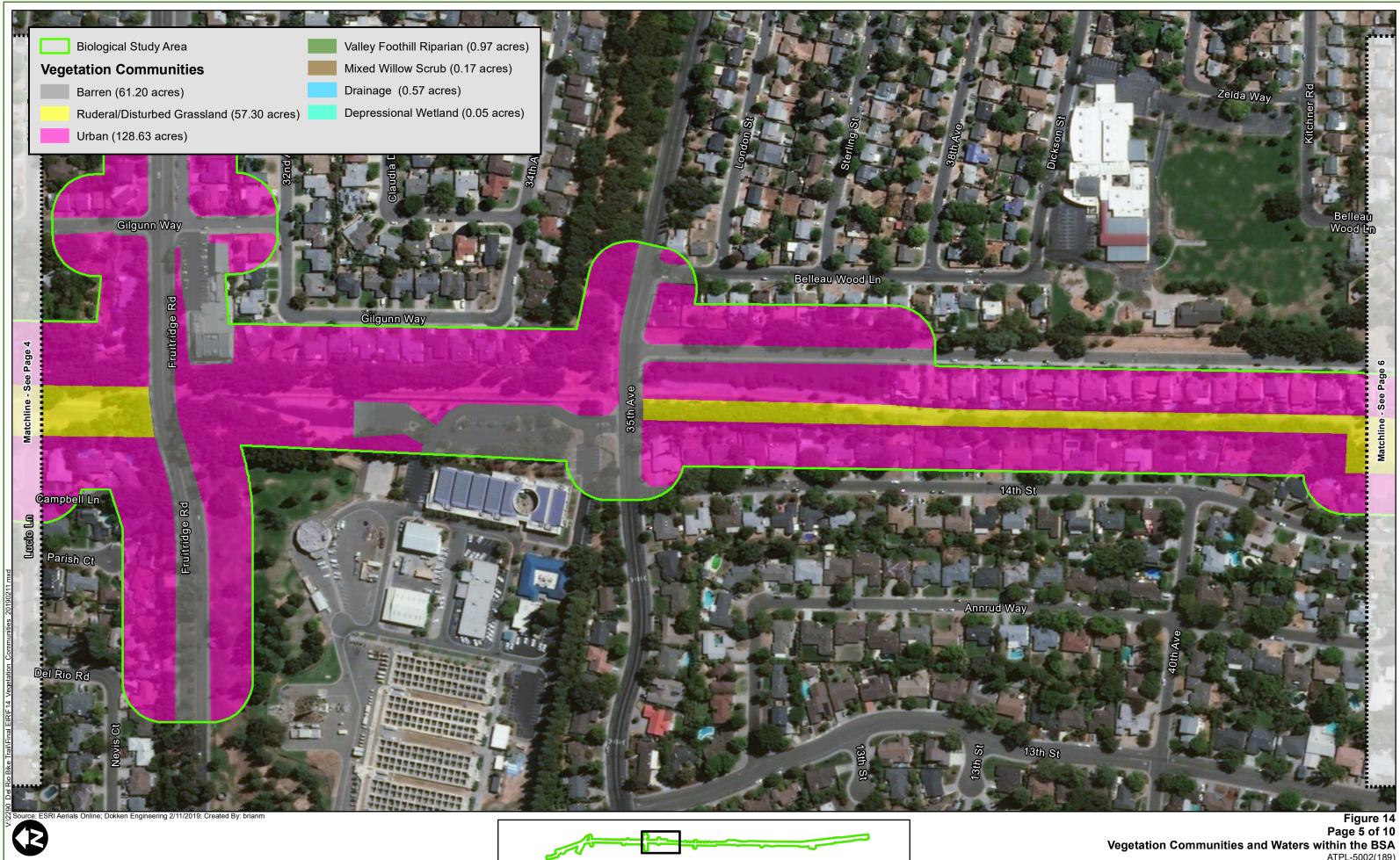


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Figure 14 Page 4 of 10 Vegetation Communities and Waters within the BSA ATPL-5002(189) Del Rio Trail Project City of Sacramento, California



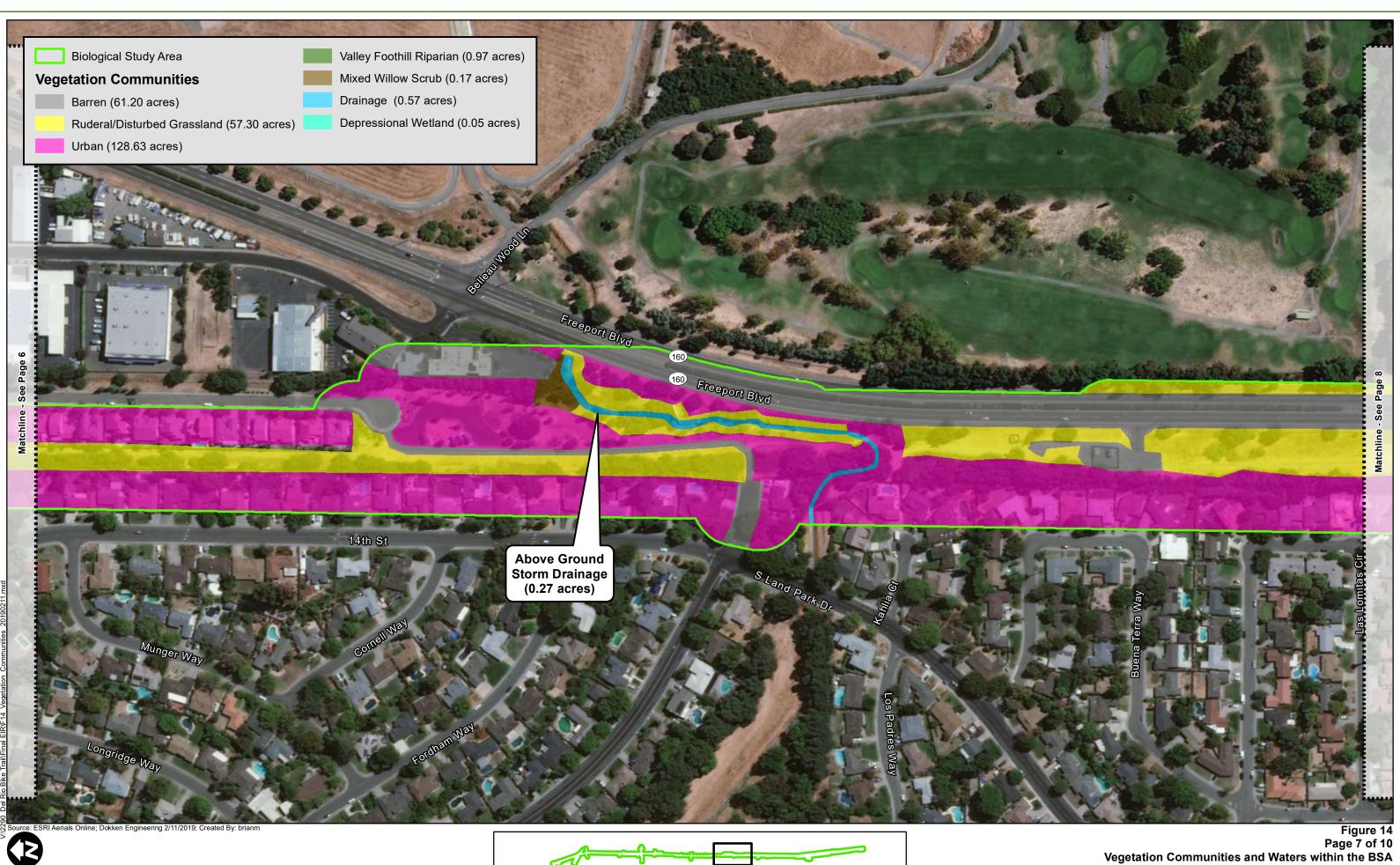
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Figure 14 Page 5 of 10 Vegetation Communities and Waters within the BSA ATPL-5002(189) Del Rio Trail Project City of Sacramento, California



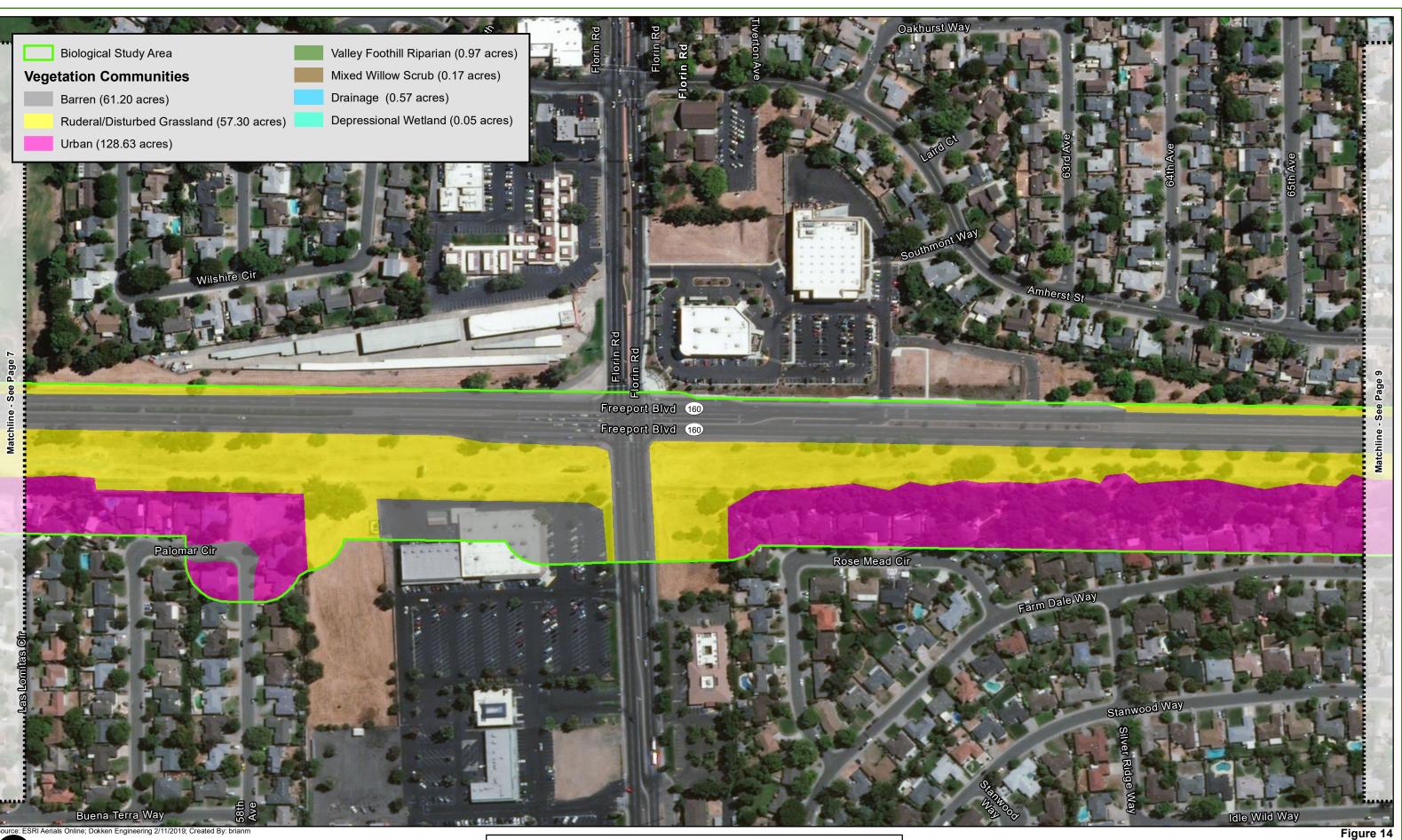
City of Sacramento, California



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Figure 14 Page 7 of 10 Vegetation Communities and Waters within the BSA ATPL-5002(189) Del Rio Trail Project City of Sacramento, California



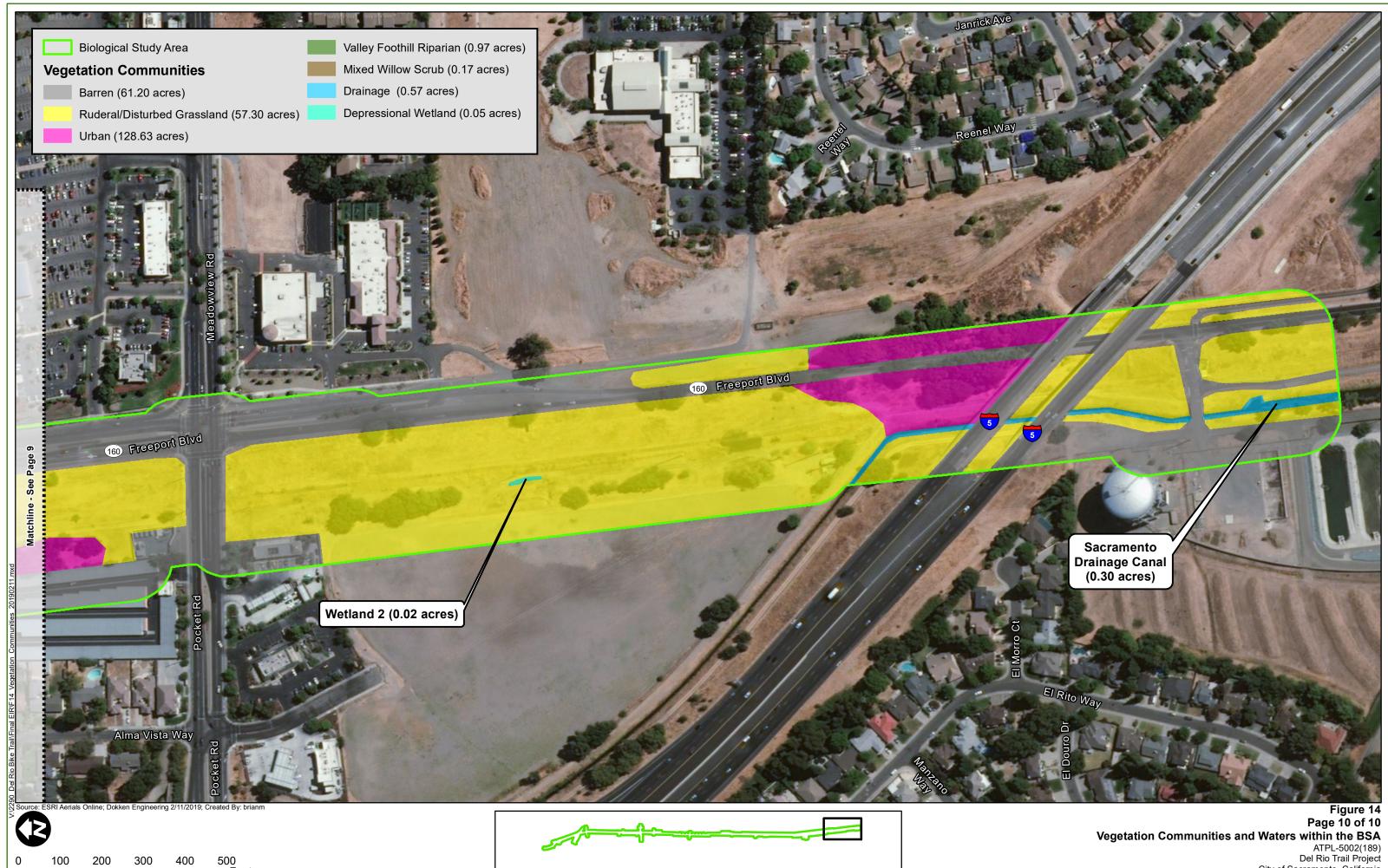
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Figure 14 Page 8 of 10 Vegetation Communities and Waters within the BSA ATPL-5002(189) Del Rio Trail Project City of Sacramento, California



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Figure 14 Page 9 of 10 Vegetation Communities and Waters within the BSA ATPL-5002(189) Del Rio Trail Project City of Sacramento, California



Feet

City of Sacramento, California

Table 7. Special-Status Species with the Potential to Occur or Known to Occur in the Project Area.

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
				Amphihian Spacias		
California red-legged frog	Rana draytonii	Fed: CA: CDF W:	T SSC	Amphibian Species Inhabits lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development and must have access to estivation habitat. Occurs from elevations near sea level to 5,200 feet.	A	Presumed Absent: The BSA does not contain a deep permanent water source, appropriate vegetative cover or suitable dispersal habitat for California red-legged frog. There are no CNDDB occurrences of the species within 36 miles of the Project vicinity. The species is presumed absent from the BSA.
California tiger salamander	Ambystoma californiense	Fed: CA: CDF W:	T T SSC	Inhabits annual grasslands and the grassy understory of Valley-Foothill Hardwood communities. Requires underground refuges, especially ground squirrel burrows and vernal pools or other seasonal water sources for breeding.	A	Presumed Absent: The BSA does not contain Valley Foothill hardwood vegetation or vernal pools. There are no CNDDB occurrences of the species within 20 miles of the Project vicinity. The species is presumed absent from the BSA.
				Bird Species		
Grasshopper sparrow	Ammodramus savannarum	Fed: CA: CDF W:	 SSC	Inhabits dry or well drained, dense grasslands on rolling hills, lowland plains, and valleys and hillsides on lower mountain slopes. Requires thick cover of native grasslands, preferably comprised of grasses, tall forbs and scattered shrubs. In southern California largely utilizes hillsides, and lower mountain slopes. Species may form small groups when nesting. Breeds April-July (0-5,000 feet).	A	Presumed Absent: The BSA does not contain suitable grassland habitat for the species. The BSA is within residential areas with urban vegetation and highly disturbed/ruderal grassland. There are no occurrences of the species within 10 miles of the Project vicinity. The species is presumed absent

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
						from the DOA
Bank swallow	Riparia riparia	Fed: CA: CDF W:	 T 	A migratory colonial nester inhabiting lowland and riparian habitats west of the deserts during spring - fall. Majority of current breeding populations occur along the Sacramento and Feather rivers in the north Central Valley. Requires vertical banks or cliffs with fine textured/sandy soils for nesting (tunnel and burrow excavations). Nests exclusively near streams, rivers, lakes or the ocean. Breeds May-July.	A	from the BSA. Presumed Absent: The BSA does not contain vertical banks or cliffs. There are no occurrences of the species within 10 miles of the Project vicinity. The species is presumed absent from the BSA.
Burrowing owl	Athene cunicularia	Fed: CA: CDF W:	 SSC	Species inhabits arid, open areas with sparse vegetation cover such as deserts, abandoned agricultural areas, grasslands, and disturbed open habitats. Requires friable soils for burrow construction (Below 5,300 feet).	A	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

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
						as significant predators of the species. The nearest CNDDB 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
Least Bell's vireo	Vireo bellii pusillus	Fed: CA: CDF W:	E E 	Summer resident of southern California inhabiting low riparian habitats in the vicinity of water and dry river bottoms. Colonies have been identified within the Sacramento Valley. Prefers willows, baccharis, mesquite and other low, dense vegetation as nesting sites (below 2000 feet).	A	Presumed Absent: The BSA does not contain suitable dense scrub habitat for the species. The BSA is highly disturbed and urbanized residential areas with ornamental plant species. The BSA is dominated by residential urban areas, which does not provide suitable foraging habitat for the species. The nearest CNDDB occurrence (2011) is within 5 miles of the BSA within the Yolo Bypass Wildlife Area. The species is presumed absent from the BSA.
Song sparrow (Modesto population)	Melospiza melodia	Fed: CA: CDF W:	 SSC	An endemic bird found exclusively in the north-central portion of the Central Valley, with highest densities in the Butte Sink and Sacramento-San Joaquin River Delta. The species is usually found in open brushy habitats, along the borders of ponds or	A	Presumed Absent: The BSA does contain suitable open brushy areas, willow scrub and mixed trees, including native and non-native oaks. However, there is a lack of emergent freshwater marshes

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
				streams, abandoned pastures, desert washes, thickets, or woodland edges. In addition, there is a strong affinity for emergent freshwater marshes dominated by tules and cattails, riparian willow thickets, and valley oak forests with a blackberry understory. Breeds from March through August. Nest found in base of shrubs or clumps of grass.		or vegetated irrigation canals present. The BSA is a highly disturbed and urbanized area dominated by residential communities. The nearest CNDDB occurrence (2009) is within 3 miles of the southern terminus of the BSA within the Stone Lakes Wildlife Refuge. The species is presumed absent from the BSA.
Swainson's hawk	Buteo swainsoni	Fed: CA: CDF W:	 T 	Inhabits grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, alfalfa or grain fields that support a stable rodent prey base. Breeds March to late August.	Н	Low to Moderate: The BSA does not contain suitable large nesting trees or suitable grassland foraging areas. However, the northern and southern terminus of the Project area are within proximity to the Sacramento River and some riparian areas are present. No raptor nesting trees or Swainson's hawks were observed within the BSA during biological surveys but there are suitable nesting trees adjacent. The nearest CNDDB occurrence is less than 1 mile from the southern terminus of the Project area along the Sacramento River. Due to the close proximity to the Sacramento River riparian habitats, and the local occurrences, the species is considered to have a low to moderate potential to occur.

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
Tricolored blackbird	Agelaius tricolor	Fed: CA: CDF W:	 CE SSC	Inhabits freshwater marsh, swamp and wetland communities, but may utilize agricultural or upland habitats that can support large colonies, often in the Central Valley area. Requires dense nesting habitat that is protected from predators, is within 3-5 miles from a suitable foraging area containing insect prey and is within 0.3 miles of open water. Suitable foraging includes wetland, pastureland, rangeland, at dairy farms, and some irrigated croplands (silage, alfalfa, etc.). Nests mid-March - early August, but may extend until October/November in the Sacramento Valley region.	A	Presumed Absent: The BSA does not contain suitable freshwater marsh, swamp or wetland communities or upland areas suitable for large colonies. The BSA is highly disturbed and urbanized and is not suitable for the species. The nearest CNDDB occurrence approximately 7miles west of the Project area within the Yolo Bypass. The species is presumed absent from the BSA.
Western snowy plover	Charadrius alexandrines nivosus	Fed: CA: CDF W:	T SSC	Inhabits sandy or gravelly beaches along the coast, on estuarine salt ponds, and the shores of large alkali lakes. Species requires sandy, gravelly or friable soil substrate for nesting. Nests are often in proximity to driftwood, rocks, or defoliated bushes. Breeds April- August.	A	Presumed Absent: The BSA does not contain suitable sandy or gravelly beaches or any estuarine areas. There are no CNDDB occurrences within 10 miles of the BSA. The species is considered absent from the BSA.
Western Yellow-billed Cuckoo	Coccyzus americans	Fed: CA: CDF W:	T E 	Species inhabits riparian forests, along broad, lower flood bottoms of larger river systems. Nests in large blocks of riparian jungles often mixed with cottonwoods. Nesting appears to be preferred in riparian forest habitats with a dense understory; requires water near nesting site. Breeds June- August.	A	Presumed Absent: The BSA does not contain suitable large-scale riparian forests. The BSA has very small tracks of riparian woodland at the northern and southern termini of the Project that are highly disturbed. Further, any occurrences within 10 miles of the BSA have been listed as extirpated. The species is

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
						considered absent from the BSA. Low to Moderate: The BSA does not contain suitable large nesting trees or suitable
White-tailed kite	Elanus leucurus	Fed: CA: CDF W:	 FP	Inhabits rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Prefers open grasslands, meadows or marshes for foraging close to isolated, dense- topped trees for nesting and perching. Breeds February- October.	A	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 CNDDB documented occurrences within a 10-mile radius of the BSA. The nearest CNDDB 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.

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
Yellow- headed blackbird	Xanthocephalu s xanthocephalus	Fed: CA: CDF W:	 SSC	Occurs primarily as a migrant and summer resident from April to early October. The species almost exclusively nests in marshes with tall emergent vegetation such as tules (Scirpus sp.) or cattails (Typha sp.), in open areas and edges over water at depths typically ranging from 1-4 feet deep. Frequently breeds within marshes edges of lakes, reservoirs, or larger ponds. Breeds from April- July.	A	Presumed Absent: The BSA does not contain emergent freshwater marshes within open areas. The BSA is a highly disturbed and urbanized area dominated by residential communities. The nearest CNDDB occurrence (2009) is within 1 miles of the southern terminus of the BSA within the Stone Lakes Wildlife Refuge; however, this occurrence is from 1899 and no other occurrences have been listed in the area since. The species is presumed absent from the BSA.
				Fish Species		
Chinook salmon – Central Valley spring run ESU	Oncorhynchus tshawytscha	Fed: CA: CDF W:	Т Т 	Spring-run Chinook enter the Sacramento-San Joaquin River system to spawn, requiring larger gravel particle size and more water flow through their redds than other salmonids. Remaining runs occur in Butte, Mill, Deer, Antelope, and Beegum Creeks, tributaries to the Sacramento River. Known to occur in Siskiyou and Trinity counties.	A	Presumed Absent: The BSA does not contain any water sources that could support the species, nor will the Project have any activities within waters that could support the species. The species is considered absent from the BSA.
Chinook salmon – Sacramento River winter- run ESU	Oncorhynchus tshawytscha	Fed: CA: CDF W:	E E 	Sacramento River winter-run Chinook enter the Sacramento-San Joaquin River system to spawn. In the San Joaquin basin adult migration and spawning occurs from October- December.	A	Presumed Absent: The BSA does not contain any water sources that could support the species, nor will the Project have any activities within waters that could support the species. The species is considered absent from the

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
Delta Smelt	Hypomesus transpacificus	Fed: CA: CDF W:	T E 	Occurs within the Sacramento-San Joaquin Delta and seasonally within the Suisun Bay, Carquinez Strait and San Pablo Bay. Most often occurs in partially saline waters.	A	BSA. Presumed Absent: The BSA does not contain any water sources that could support the species, nor will the Project have any activities within waters that could support the species. The species is considered absent from the BSA.
Longfin smelt	Spirinchus thaleichthys	Fed: CA: CDF W:	C T SSC	Within California, occurs slightly upstream from Rio Vista (on the Sacramento River in the Delta) including the Cache Slough region and Medford Island (on the San Joaquin River in the Delta) through Suisun Bay and Suisun Marsh, the San Pablo Bay, the main San Francisco Bay, South San Francisco Bay, the Gulf of the Farallones, Humboldt Bay, and the Eel river estuary & local coastal areas. Resides in California and are primarily an anadromous estuarine species that can tolerate salinities ranging from freshwater to nearly pure seawater. Prefers temperatures in the range of 16-18°C and salinities ranging from 15-30 ppt. Their spatial distribution within a bay or estuary is seasonally variable. Longfin smelt may also make daily migrations; remaining deep during the day and rising to the surface at night.	A	Presumed Absent: The BSA does not contain any water sources that could support the species, nor will the Project have any activities within waters that could support the species. The species is considered absent from the BSA.

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
Sacramento perch	Archoplites interruptus	Fed: CA: CDF W:	 SSC	Inhabits sloughs, lakes, and slow moving rivers of the Central Valley. Prefers turbid lakes, reservoirs and ponds warmed by summer heat and absent of plants; may occasionally occur in clear water among beds of aquatic vegetation. Species tolerates high temperatures, high salinities, high turbidity, and low water clarity. Young require aquatic and overhanging vegetation for cover. Spawns March-August in water temperatures between 64-84°F	A	Presumed Absent: The BSA does not contain any water sources that could support the species, nor will the Project have any activities within waters that could support the species. The species is considered absent from the BSA.
Steelhead – Central Valley DPS	Oncorhynchus mykiss	Fed: CA: CDF W:	T 	Spawning occurs in small tributaries on coarse gravel beds in riffle areas. Central Valley steelhead are found in the Sacramento River system. The principal remaining wild populations spawn annually in Deer and Mill Creeks in Tehama County, in the lower Yuba River, and a small population in the lower Stanislaus River.	A	Presumed Absent: The BSA does not contain any water sources that could support the species, nor will the Project have any activities within waters that could support the species. The species is considered absent from the BSA.

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
				Invertebrate Species		
Conservancy fairy shrimp	Branchinecta conservatio	Fed: CA: CDF W:	E 	Inhabits relatively large and turbid clay bottomed playa vernal pools. Species requires pools to continuously hold water for a minimum of 19 days and must remain inundated into the summer months. Occupied playa pools typically are 1 to 88 acres in size, but species may utilize smaller, less turbid pools.	A	Presumed Absent: The BSA does not contain vernal pool habitat for the species. The nearest CNDDB documented occurrence of the species is approximately 9 miles to the southwest of the southern terminus of the Project BSa and was recorded in 2008. The species is presumed absent based on lack of required habitat present within the BSA and the lack of local documented occurrences.
Valley elderberry longhorn beetle	Desmocerus californicus dimorphus	Fed: CA: CDF W:	T 	Species requires elderberry shrubs as host plants. Typically occurs in moist valley oak woodlands associated with riparian corridors in the lower Sacramento River and upper San Joaquin River drainages. (Sea level- 3,000 feet).	Ρ	Presumed Present: The BSA does contain host elderberry shrubs for the species and during biological surveys exit holes were observed within the shrubs identified. However, all of the elderberry shrubs are within upland urban habitat. the nearest CNDDB occurrence is approximately 2 miles from the BSA. The species is presumed present within the BSA due to the observations of exit holes, however, this Project is not anticipated to impact the shrubs.
Vernal pool fairy shrimp	Branchinecta lynchi	Fed: CA: CDF W:	T 	In California inhabits portions of Tehama county, south through the Central Valley, and scattered locations in Riverside County and the	A	Presumed Absent: The BSA does not contain vernal pool habitat for the species. The nearest CNDDB occurrence of

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
				Coast Ranges. Species associated with smaller and shallower cool-water vernal pools approximately 6 inches deep and short periods of inundation. Inhabited pools have low to moderate levels of alkalinity and total dissolved solids. The shrimp are temperature sensitive, requiring pools below 50 F to hatch and dying within pools reaching 75 F. Young emerge during cold-weather winter storms.		the species is less than 2 miles from the site. The species is presumed absent based on lack of required habitat within the BSA.
Vernal pool tadpole shrimp	Lepidurus packardi	Fed: CA: CDF W:	E 	Inhabits vernal pools and swales containing clear to highly turbid waters such as pools located in grass bottomed swales of unplowed grasslands, old alluvial soils underlain by hardpan, and mud-bottomed pools with highly turbid water.	A	Presumed Absent: The BSA does not contain suitable vernal pool or grassland swale habitat for vernal pool tadpole shrimp. The nearest CNDDB occurrence is less than 2 miles from the Project area but is located in a habitat conservation bank with suitable vernal pool habitat.
		<u> </u>		Mammal Species		
American badger	Taxidea taxus	Fed: CA: CDF W:	 SSC	Prefers treeless, dry, open stages of most shrub and herbaceous habitats with friable soils and a supply of rodent prey. Species also inhabits forest glades and meadows, marshes, brushy areas, hot deserts, and mountain meadows. Species maintains burrows within home ranges estimated between 338-1,700 acres, dependent on seasonal activity. Burrows are frequently re- used, but new burrows may be created nightly. Young are born in March and April within burrows dug in	A	Presumed Absent: The BSA is highly disturbed and within a high density of residential communities. At such levels of disturbance and residential areas it is unlikely the species would be present. The last known dated occurrence of the species was 1938 and this occurrence was approximately 8 miles south from the BSA. Due to the lack of local occurrences and the high disturbance levels within the

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
				relatively dry, often sandy, soil, usually in areas with sparse overstory cover. Species is somewhat tolerant of human activity, but is sensitive to automobile mortality, trapping, and persistent poisons (up to 12,000 feet).		BSA, the species is presumed absent from the BSA.
Pallid bat	Antrozous pallidus	Fed: CA: CDF W:	 SSC	Inhabits low elevations of deserts, grasslands, shrub lands, woodlands and forests year round. Most common in open, dry habitats with rocky areas for roosting. Forages over open ground within 1-3 miles of day roosts. Prefers caves, crevices, and mines for day roosts, but may utilize hollow trees, bridges and buildings. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites. Maternity colonies form early April and young are born April-July (below 10,000 feet).	A	Presumed Absent: The BSA does not contain the requisite deserts, grasslands, shrub lands, woodlands or forest habitat. No suitable day or night roosting habitat was observed within the BSA during biological surveys. The nearest CNDDB occurrence of the species is more than 10 miles from the BSA.
	•			Reptile Species		
Giant garter snake	Thamnophis gigas	Fed: CA: CDF W:	T T 	Inhabits marsh, swamp, wetland (including agricultural wetlands), sloughs, ponds, rice fields, low gradient streams and irrigation/drainage canals adjacent to uplands. Ideal habitat contains both shallow and deep water with variations in topography. Species requires adequate water during the active season (April-November), emergent, herbaceous wetland vegetation, such as cattails and bulrushes, for escape cover and foraging habitat and mammal burrows	A	Presumed Absent: Wetland, slough, pond or rice field habitat for giant garter snake is not present within the BSA. In addition, the stream/drainage canal is a seasonal water feature and does not provide adequate aquatic habitat during the species' active season. The nearest CNDDB occurrence of the species is approximately 3 miles from the BSA within the Stone Lakes National Wildlife Refuge.

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
				estivation. Requires grassy banks and openings in waterside vegetation for basking and higher elevation uplands for cover and refuge from flood waters during winter dormant season.		
Western pond turtle	Emys marmorata	Fed: CA: CDF W:	 SSC	A fully aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches with aquatic vegetation. Requires basking sites and suitable (sandy banks or grassy open field) upland habitat for reproduction (below 4,700 feet).	A	Presumed Absent: The BSA is highly disturbed and while western pond turtles may inhabit ephemeral streams, the stream/drainage canal is likely too dry to support many of the western pond turtle's primary prey sources including frogs, crayfish, and fish. In addition, the banks of the drainages and canals are partially concrete, asphalt, and rip-rap lined and not suitable upland habitat for western pond turtle. The nearest CNDDB occurrence of the species is approximately 3 miles from the BSA within the Stone Lakes National Wildlife Refuge. Due to lack of suitable upland habitat and lack of habitat for prey species, the western pond turtle is presumed absent from the BSA.
		•		Plant Species		
Alkali milk- vetch	Astagalus tener var. tener	Fed: CA: CNPS :	 1B.2	An annual herb inhabiting low ground and alkaline soils of playas, alkaline flats, vernally moist meadows, vernal pools, and valley and foothill grassland of adobe clay. Flowers March–June (0-197 feet).	A	Presumed Absent: The BSA does not contain alkaline flats or vernal pool habitat suitable for the species. The nearest occurrence of the species is approximately 8 miles west

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
						within the Yolo Bypass. The species is considered absent from the BSA.
Baker's navarretia	Navarretia leucocephala ssp. bakeri	Fed: CA: CNPS :	 1B.1	An annual herb inhabiting mesic soils of vernal pools and swales within cismontane woodland, lower montane coniferous forest, meadows and seeps, valley and foothill grasslands communities. Flowers April-July (16- 5,708 feet).	A	Presumed Absent: The BSA does not contain suitable valley grassland or vernal pool habitat for the species. The nearest occurrence of the species is approximately 10 miles west of the BSA within the Yolo Bypass area. The species is considered absent from the BSA.
Brittlescale	Atriplex depressa	Fed: CA: CNPS :	 1B.2	An annual herb inhabiting alkaline, clay soils of chenopod scrub, meadows and seeps, playas, vernal pools and valley and foothill grassland communities. Flowers June –October (0-1,049 feet).	A	Presumed Absent: The BSA does not contain suitable valley grassland or vernal pool habitat for the species. The nearest occurrence of the species is approximately 13 miles west of the BSA. The species is considered absent from the BSA.
Colusa grass	Neostapfia colusana	Fed: CA: CNPS :	 1B.1	An annual herb inhabiting adobe soils of large or deep vernal pools. Flowers May –August (0-656 feet).	A	Presumed Absent: The BSA does not contain suitable vernal pool habitat for the species. The nearest occurrence of the species is approximately 10 miles west of the BSA within the Yolo Bypass area. The species is considered absent from the BSA.
Crampton's tuctorial	Tuctoria mucronata	Fed: CA: CNPS :	 1B.1	An annual herb inhabiting valley and foothill grasslands and vernal pools. Blooms April-August (16-32 feet).	A	Presumed Absent: The BSA does not contain suitable grassland or vernal pool habitat for the species. The

Common Name	Scientific Name	Status		General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
						nearest occurrence of the species is approximately 10 miles west of the BSA within the Yolo Bypass area. The species is considered absent from the BSA.
Dwarf downingia	Downingia pusilla	Fed: CA: CNPS :	 2B.2	An annual herb inhabiting vernal pools and mesic valley and foothill grassland communities. Flowers March-May (3-1,460 feet).	A	Presumed Absent: The BSA does not contain suitable grassland or vernal pool habitat for the species. The nearest occurrence of the species is approximately 5 miles south of the BSA within the Stone Lakes National Wildlife Refuge area. The species is considered absent from the BSA.
Ferris' milk- vetch	Astagalus tener var. ferrisiae	Fed: CA: CNPS :	 1B.1	An annual herb inhabiting vernally mesic meadows and seeps and subalkaline flats within valley and foothill grassland communities. Known only from six extant occurrences. Flowers April - May (6- 246 feet).	A	Presumed Absent: The BSA does not contain suitable vernally mesic meadows and seeps and subalkaline flats for the species. The nearest occurrence of the species is approximately 6 miles west of the BSA within the Yolo Bypass area. The species is considered absent from the BSA.
Heartscale	Atriplex cordulata var. cordulata	Fed: CA: CNPS :	 1B.2	An annual herb inhabiting saline or alkaline soils of chenopod scrub, meadows and seeps, and sandy valley and foothill grassland communities. Flowers June –July (0- 1837 feet).	A	Presumed Absent: The BSA does not contain suitable meadows or grassland habitat for the species. The nearest occurrence of the species is approximately 12 miles west of the BSA. The species is considered absent from the

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
						BSA.
Heckard's pepper-grass	Lepidium latipes var. heckardii	Fed: CA: CNPS :	 1B.2	An annual herb found in alakine flats within valley or foothill grasslands. Flowers March-May (0 - 660 feet)	A	Presumed Absent: The BSA does not contain suitable grassland habitat for the species. The nearest occurrence of the species is approximately 10 miles west of the BSA within the Yolo Bypass area. The species is considered absent from the BSA.
Jepson's coyote-thistle	Eryngium jepsonii	Fed: CA: CNPS :	 1B.2	A perennial herb inhabiting moist clay soils within valley and foothill grassland and vernal pool communities. Flowers April-August (0- 1,640 feet)	A	Presumed Absent: The BSA does not contain suitable grassland or vernal pool habitat for the species. The nearest occurrence of the species is approximately 10 miles west of the BSA within the Yolo Bypass area. The species is considered absent from the BSA.
Legenere	Legenere limosa	Fed: CA: CNPS :	 1B.1	An annual herb inhabiting wet areas, vernal pools, and ponds. Flowers May-June (0-2,887 feet).	A	Presumed Absent: The BSA does not contain suitable vernal pool habitat for the species. The nearest occurrence of the species is approximately 4 miles south of the BSA within the Stone Lakes National Wildlife Refuge. The species is considered absent from the BSA.
Northern California black walnut	Juglans hindsii	Fed: CA: CNPS :	 1B.1	A deciduous tree inhabiting along streams and slopes within riparian forest and riparian woodland communities. As a result of	A	Presumed Absent: The BSA contains a small area of suitable riparian habitat along the Sacramento River.

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
				widespread agricultural use as rootstock for English walnut, the species now occurs commonly throughout much of California. Jepson (2018) considers 3 sites native for the species and only individuals found at the native locations are consider to be special-status species. Flowers April- May (0-1,444 feet).		According to CNDDB, 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 expatriated special-status population of the species along the Sacramento River, the species is considered absent from the BSA.
Peruvian dodder	Cuscuta obtusiflora var. glandulosa	Fed: CA: CNPS :	 2B.2	An annual parasitic vine inhabiting freshwater marsh communities on herbs such as Alternanthera sp., Dalea sp., Lythrum sp., Polygonum sp., and Xanthium sp. Flowers July - October (49-1,640 feet).	A	Presumed Absent: The BSA does not contain suitable freshwater marsh communities for the species. The nearest occurrence of the species is approximately 4 miles south of the BSA within a freshwater lake. Due to the lack of suitable habitat and lack of local occurrences, the species is considered absent from the BSA.
Saline clover	Trifolium hydrophilum	Fed: CA: CNPS :	 1B.2	An annual herb inhabiting mesic, alkaline soils of salt marsh, marshes and swamps, vernal pools, and valley and foothill grasslands. Flowers April- June (0 - 1,000 feet).	A	Presumed Absent: The BSA does not contain suitable vernal pool or grassland habitat for the species. The nearest occurrence of the species is approximately 4 miles south of the BSA within the Stone Lakes National

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
						Wildlife Refuge. The species is considered absent from the BSA. Presumed Absent: The BSA does not contain suitable
Sanford's arrowhead	Sagittaria sanfordii	Fed: CA: CNPS :	 1B.2	A perennial rhizomatous herb inhabiting freshwater marshes, swamps, ponds and ditches. Flowers May-October (0-2,132 feet).	Ρ	freshwater marsh or pond habitat for the species. However, there are some ditches and irrigation channels within the BSA that could be utilized by the species. While the nearest occurrence of the species is less than 1 mile from the southern terminus of the Project, there is no hydrologic connectivity to the drainages within the BSA. Focused rare plant surveys were conducted in May 2017 during the species blooming season and determined the species does not occupy the drainages with BSA. Therefore, the species is presumed absent from the BSA
San Joaquin spearscale	Extriplex joaquinana	Fed: CA: CNPS :	 1B.2	An annual herb inhabiting alkaline soils of chenopod scrub, meadows and seeps, playas and valley and foothill grassland communities. Flowers April-September (0-2,739 feet).	A	Presumed Absent: The BSA does not contain suitable grassland, meadow, seep, or playa habitat for the species. The nearest occurrence of the species is approximately 10 miles west of the BSA within the Yolo Bypass area. The species is considered absent from the BSA.

Common Name	Scientific Name		Status	General Habitat Description	Habitat Present/ Absent	Potential for Occurrence and Rationale
Suisun Marsh aster	Symphyotrichu m lentum	Fed: CA: CNPS :	 1B.2	A perennial rhizomatous herb inhabiting wetlands, freshwater marsh, and brackish-marsh communities. Flowers May-November (0-984 feet).	A	Presumed Absent: The BSA does not contain suitable fresh or brackish marsh community habitat for the species. The nearest occurrence of the species is approximately 5 miles west of the BSA within the Yolo Bypass area. The species is considered absent from the BSA.
Woolly rose- mallow	Hibiscus Iasiocarpos var. occidentalis	Fed: CA: CNPS :	 1B.2	A perennial rhizomatous herb inhabiting freshwater wetlands, wet banks, and marsh communities. Often found in-between riprap on levees. Flowers June-September (0-394 feet).	A	Presumed Absent: The BSA does not contain suitable freshwater wetlands or marsh habitat for the species. The nearest occurrence of the species is approximately 3 miles south of the BSA within the Stone Lakes National Wildlife Refuge area. The species is considered absent from the BSA.
Federal Designa (FESA, USFWS) E: Federally listed T: Federally listed C: Candidate Other Designatio	d, endangered d, threatened		State Designation (CESA, CDFW) E: State listed, end T: State listed, thre CE: Candidate End C: Candidate FP: Fully Protected	langered eatened dangered		
CDFW_SSC: CDFW Species of Special Concern <u>California Native Plant Society Designations:</u> *Note: according to CNPS (Skinner and Pavlik 1994), plants on Lists 1B and 2 meet definition: Section 1901, Chapter 10 of the CFG Code. This interpretation is inconsistent with other definition 1A: Plants presumed extinct in California. 1B: Plants rare and endangered in California and throughout their range. 2B: Plants are endangered in California					or listing as t	hreatened or endangered und

2: Plants rare, threatened, or endangered in California but more common elsewhere in their range.

3: Plants about which more information is needed; a review list.

Plants 1B, 2, and 3 extension meanings:

_.1 Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 Fairly endangered in California (20-80% occurrences threatened)

.3 Not very endangered in California (<20% of occurrences threatened or no current threats known)

Potential for Occurrence Criteria:

Present: Species was observed on site during a site visit or focused survey.

High: Habitat (including soils and elevation factors) for the species occurs on site and a known occurrence has been recorded within 5 miles of the site.

Low-Moderate: Either low quality habitat (including soils and elevation factors) for the species occurs on site and a known occurrence exists within 5 miles of the site; or suitable habitat strongly associated with the species occurs on site, but no records were found within the database search.

Presumed Absent: Focused surveys were conducted and the species was not found, or species was found within the database search but habitat (including soils and elevation factors) do not exist on site, or the known geographic range of the species does not include the survey area.

Source: (Baldwin 2012), (Bennet 2005), (CaliforniaHerps 2015), (CDFW 2015) (CNDDB 2017), (CNPS 2015), (Miller and Hornaday 1999), (USFWS 2002a, 2002b, 2007, 2010, USFWS 2012) (Wang 2010) (Yoshiyama et. al 1998), (Zeiner 1988)

Sensitive Habitats

Sensitive habitats include sensitive natural plant communities and other habitats designated and/or regulated by CDFW, USFWS, and USACE. Under Section 404 of the CWA, wetlands and other waters of the U.S. are subject to the jurisdiction of USACE. Aquatic habitats may also receive protection under California statutes including Section 1602 of the California Fish and Wildlife Code and the California Porter-Cologne Water Quality Control Act.

Wetlands and Waters

Based on survey results, the USGS *Sacramento West* and *Clarksburg*, *California* 7.5-minute quadrangle topographic maps, Federal Emergency Management Agency (FEMA) flood maps, and the USFWS National Wetlands Inventory (NWI 2017), a total of four aquatic features were found within the BSA.

An above-ground storm drainage feature is located approximately 300 feet south of the intersection of Belleau Wood Lane and Freeport Boulevard and west of Freeport Boulevard, within the BSA. At the southern terminus of the Project area, the Sacramento Drainage Canal is also within the BSA. Further, two freshwater wetland features were identified during the May 2017 jurisdictional water delineations. Wetland Feature 1 is located approximately 700 feet south of Pocket Road and approximately 150 feet west of Freeport Boulevard at a southwest orientation to the Pocket Road and Freeport Boulevard intersection (see Figure 15). Wetland Feature 2 is located approximately 350 feet northeast of the intersection of Farm Dale Way and Branwood Way (see Figure 15). Of the four features identified within the limits of the BSA, only two are considered waters of the U.S. and State (the Sacramento Drainage Canal and an above-ground storm drainage feature). The remaining two aquatic features identified within the BSA are small, non-jurisdictional, depressional wetland features (Wetland 1 and Wetland 2) (see Figure 15).

Drainage Features

The Sacramento Drainage Canal occurs within the southern terminus of the BSA. Within the BSA, the Sacramento Drainage Canal is earthen bottomed with regularly maintained banks. No riparian vegetation is associated with the canal, but in-channel emergent vegetation is present. Flow directionality within the BSA is in the southward direction. This feature is currently isolated from the Sacramento River (a water of the U.S. and State) through a lock system adjacent to a water treatment plant, but would have connectivity to the Sacramento River should those locks be removed; therefore, the Sacramento Drainage Canal is considered a water of the U.S. and State.

The above-ground storm drainage feature collects the stormwater run-off from the adjacent urban environment flowing westward and ultimately drains into the Sacramento Drainage Canal. Within the BSA, the feature transitions from a fully concrete lined drainage channel to an earthen bottomed channel containing in-channel wetland vegetation. Within the area of potential disturbance, the feature is completely concrete lined with no in-channel vegetation. As this feature drains into the Sacramento Drainage Canal, it is considered a jurisdictional water of the U.S. and State. Only a small portion of the channel, located west of Freeport Boulevard and north of 14th Street, contains riparian vegetation. The remainder of the channel is partially lined by ruderal/disturbed grassland and an urban vegetation community (ornamentals and mixed native and non-native oaks).

Depressional Wetland Features

The two depressional wetland features are vegetated with low growing hydrophitic herbs and grasses, but provide minimal aquatic habitat and do not hold adequate water to support a wetland community that could be classified as "emergent". The wetlands are isolated, closed depressional features with no downstream surface connectivity to other jurisdictional water features. These features were assessed using the methods described in the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)* (USACE 2008). As these features were found to be consistent

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with the definition of a wetland, but are completely isolated from waters of the U.S. or State; therefore, they are not considered jurisdictional features.

Vegetation

Botanical surveys were conducted during the May 12, and May 17, 2017 biological surveys. Following the biological surveys, the Project area vegetation was classified using the CDFW *A Guide to Wildlife Habitats of California* (1988). 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).

Moderate to large diameter native oak and non-oak trees species occur within the BSA and the Project alignment. Any trees requiring removal shall meet the City's requirements as a private protected tree pursuant to Sacramento City Ordinance 2016-0026, Chapter 12.56 City and Private Protected Trees.

Regional Species and Habitats of Concern

Of the species identified by the database searches, the Swainson's hawk (*Buteo swainsoni*) has been identified to have a low to moderate potential of occurring within the BSA. In addition, based on the observance of emergence exit holes on elderberry shrubs within the BSA, the valley elderberry longhorn beetle (VELB) (*Desmocerus californicus dimorphus*) is presumed present within the BSA. However, all elderberry shrubs are outside the Project impact area. No critical habitat occurs within or adjacent to the BSA.

Swainson's Hawk

The Swainson's hawk is State-listed as threatened. Swainson's hawk migrates annually from wintering areas in South America to breeding locations in northwestern Canada, the western U.S., and Mexico. In California, Swainson's hawks nest throughout the Sacramento and San Joaquin Valleys in large trees in riparian habitats and in isolated trees in or adjacent to agricultural fields.

No Swainson's hawk or Swainson's hawk nests were observed during the May 12th and May 17th biological surveys. The BSA does not contain suitable large nesting trees or suitable grassland foraging areas. However, the northern and southern termini of the Project area are within proximity to the Sacramento River and some riparian areas are present. The nearest CNDDB occurrence is less than 1 mile from the southern terminus of the Project area along the Sacramento River. Due to the close proximity to the Sacramento River riparian habitats, and the local occurrences, the species is considered to have a low to moderate potential to occur.

White Tailed Kite

White-tailed kite is a fully protected species under Fish and Game Code (FGC) Section 3511. This level of protection dictates that no individuals of this species may be impacted in any way. The species has a restricted distribution in the United States, occurring only in California and western Oregon and along the Texas coast. The species is common in California's Central Valley margins within scattered oaks and river bottomlands. White-tailed kites nest in riparian and oak woodlands and forage in nearby grasslands, pastures, agricultural fields, and wetlands. They use nearby treetops for perching and nesting sites. Voles and mice are common prey species.

No white-tailed kite or white tailed-kite nests were observed during the May 12th and May 17th biological surveys. The BSA does not contain suitable large nesting trees or suitable grassland foraging areas. However, there are suitable nesting trees and suitable foraging habitat adjacent to the southern terminus of the BSA. Additionally,there are several CNDDB documented occurrences within a 10-mile radius of

the BSA. The nearest CNDDB 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.

Valley Elderberry Longhorn Beetle

VELB is a Federal listed threatened species. Critical habitat for the species was designated by the USFWS on August 8, 1980 (45 Federal Register [FR] 52803). Elderberry shrubs are obligate hosts for VELB larvae. Elderberry shrubs are often associated with species common to the riparian forests and adjacent uplands in the Central Valley and foothills the elderberry inhabits, such as, cottonwood (*Populus* spp.), willow, ash (*Fraxinus* spp.), oak (*Quercus* spp.), and walnut (*Juglans* spp.) (Barr 1991). The VELB's range has been reduced and greatly fragmented due to a loss of elderberry inhabited communities, most especially riparian habitat loss. Habitat loss is derived from agricultural development, urbanization, levee maintenance, and pesticide drift where aerial application or fogging of crops occurs near riparian habitats (USFWS 1984 and Barr 1991).

Adult VELB feed on elderberry foliage and are present from March through early June. During this time, the adults mate within the canopy and females lay their eggs, either singularly or in small clusters, in living elderberry bark crevices or at the junction of stem/trunk or leaf petiole/stem (Barr 1991). After eggs hatch, the first instar larvae burrow into the host elderberry stems to feed on pith for one to two years. As the larvae become ready to pupate, it chews outward from the center of the stem through the bark. After the larvae plugs the newly constructed emergent hole with shavings, it returns to the pupal chamber to metamorphose, and will emerge in mid-March through June as adults. Elderberry stems with emergence holes indicate current and/or previous VELB presence. VELB utilize stems greater than 1-inch diameter and produce circular to oval emergent holes 7 to 10 millimeters in diameter with the majority occurring 4 feet or less above the ground (Barr 1991).

Based on the *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle* (USFWS 2017a), adverse impacts to elderberry shrubs can occur either at a habitat scale or at an individual shrub scale. If elderberry shrubs are found on or within 50 meters (165 feet) of the Project site, a habitat assessment is conducted to determine if the Project area is in riparian or non-riparian habitat. If the Project site is non-riparian and contains elderberry shrubs, exit hole surveys are used to evaluate the site for occupancy. Exit hole surveys are not essential in riparian areas but may be conducted in order to assess the level and significance of adverse effects. All shrubs are also evaluated for their distance from riparian habitats. Isolated, non-riparian elderberry clumps are less likely to be occupied or become colonized by VELB and those beyond 800 meters (2,526 feet) from the nearest elderberry clump become increasingly less likely to be occupied. Lastly, a Project site is evaluated on a shrub's proximity to historic riparian corridors because isolated elderberry clumps that were part of a historic riparian community may still support VELB.

Based on USFWS Critical Habitat maps, the Project area is not located within designated critical habitat for VELB; however, the Build Alternative is within the current range of the species. Focused elderberry surveys and habitat assessments, conducted by Dokken Engineering biologists on May 12th and May 17th, noted 17 elderberry shrubs within the BSA. Utilizing the CDFW's *A Guide to Wildlife Habitats of California*, all of the shrubs within the BSA are located within a highly disturbed, urban habitat (upland) (Figure 16 - Elderberry Shrubs within the BSA). An exit hole survey determined that of the 17 elderberry shrubs observed, only 4 contained exit holes. Table 8, below, displays the elderberry shrubs observed within the BSA, the presence/absence of exit holes, the habitat in which the shrubs were found, and the distance to the nearest riparian habitat.

Elderberry Shrub Number	Habitat Type	Exit holes	Distance from Nearest Riparian Habitat
1	Upland, Non-riparian	Absent	6,190 feet
2	Upland, Non-riparian	Absent	6,190 feet
3	Upland, Non-riparian	Absent	6,190 feet
4	Upland, Non-riparian	Absent	6,190 feet
5	Upland, Non-riparian	Absent	6,190 feet
6	Upland, Non-riparian	Absent	6,190 feet
7	Upland, Non-riparian	Absent	1,150 feet
8	Upland, Non-riparian	Absent	1,150 feet
9	Upland, Non-riparian	Present	1,190 feet
10	Upland, Non-riparian	Absent	1,190 feet
11	Upland, Non-riparian	Absent	1,190 feet
12	Upland, Non-riparian	Absent	1,190 feet
13	Upland, Non-riparian	Present	1,190 feet
14	Upland, Non-riparian	Absent	1,190 feet
15	Upland, Non-riparian	Absent	1,190 feet
16	Upland, Non-riparian	Present	1,190 feet
17	Upland, Non-riparian	Present	1,190 feet

Table 8. Elderberry Shrubs located within the BSA

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Migratory Birds

CFG Code Section 3513 prohibits the take or possession of any migratory non-game bird as designated in the MBTA or any part of such migratory non-game bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA. Additionally, CFG Code Section 3503 prohibits the destruction of bird nests and Section 3503.5 prohibits the killing of raptor species and destruction of raptor nests. During the biological surveys, evidence of potentially suitable nesting habitat was observed within the trees and shrubs within the BSA.

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to biological resources. When an impact is determined to be significant, mitigation measures have been identified that would reduce or avoid that impact.

Methodology of Analysis

For the purposes of this environmental document, an impact would be significant if any of the following conditions, or potential thereof, would result with implementation of the Build Alternative:

- Creation of a potential health hazard, or use, production or disposal of materials that would pose a hazard to plant or animal populations in the area affected;
- Substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animal; or,
- Affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands).

For the purposes of this document, "special-status" has been defined to include those species that are:

- Plant and Wildlife species listed, or proposed for listing, as threatened, or endangered under the FESA (50 CFR 17.12 for listed plants, 50 CFR 17.11 for listed animals, and various notices in the Federal Register for proposed species);
- Plant and wildlife species that are listed or proposed for listing by the State as threatened or endangered under the CESA (14 CCR 670.5);
- Plant and wildlife species that meet the definitions of "rare" or "endangered" under CEQA Guidelines, Section 15380;
- Plant and wildlife species that are designated as "special animals" or "those of greatest conservation need", by CDFW through the California Natural Diversity Database (CNDDB);
- Wildlife Species of Special Concern to CDFW;
- Wildlife listed as "Fully Protected" in California under the CDFG Code;
- Plants listed as rare under the State Native Plant Protection Act (NPPA) of 1977 (CDFG Code 1900 et seq.);
- Plants considered by the CNPS to be Rank 1A- "plants presumed extirpated in California and either rare or extinct elsewhere", or Rank 1B- "rare, threatened, or endangered in California and elsewhere";
- Plants considered by CNPS to be a Rank 2A- Plants presumed extirpated in California, but common elsewhere", or Rank 2B- "rare, threatened, or endangered in California and common elsewhere";
- Plants considered by CNPS to be a Rank 3- "plants about which more information is needed" and cannot be yet be excluded from review"; and
- Plants considered by CNPS to be a Rank 4- "plants with limited distribution".

Environmental Impacts

This section analyzes the proposed alternatives potential to result in significant environmental impacts to biological resources. Where an impact finding is determined to be significant, an overview of mitigation measures have been identified that would reduce and/or avoid the potential for impact.

Project Impact Analysis

This section discusses potential impacts associated with the Build Alternative and provides mitigation measures where necessary.

Impact BIO-1: Potential to have a substantial adverse effect, either directly or through habitat modifications, on any species in local or regional plans, policies, or regulations, or regulated by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Build Alternative

The Build Alternative would not result in substantial degradation of the quality of the environment, reduction of the habitat, reduction of population below self-sustaining levels of threatened or endangered species of plant or animals. There is low to moderate potential for Swainson's hawk (*Buteo swainsoni*) and high potential for VELB (*Desmocerus californicus dimorphus*).

Swainson's hawk

Although Swainson's hawk was not observed during the 2017 biological surveys, the species could nest in the Project vicinity. However, the species is unlikely to nest within the Project footprint, as the BSA is predominantly located in an urban habitat with little to no foraging habitat, which minimizes the species' potential for onsite nesting. Considering no trees containing existing Swainson's hawk nests will be removed and with the implementation of avoidance and minimization measure **BIO-9**, no impacts or take of Swainson's hawk are anticipated.

White tailed-kite

Although the white-tailed kite was not observed during the 2017 biological surveys, the species could nest and foraging the Project vicinity. However, the species is unlikely to nest within the Project footprint, as the BSA is predominantly located in an urban habitat with little to no foraging habitat, which minimizes the species' potential for onsite nesting. Considering no trees containing existing white-tailed kite nests will be removed and with the implementation of avoidance and minimization measures **BIO-3** and **BIO-9**, no impacts or take of white-tailed kite are anticipated.

Valley Elderberry Longhorn Beetle

Although VELB exit holes were observed in a small number of elderberry shrubs within the BSA, the shrubs are extremely isolated from other elderberry shrubs or riparian habitat. Considering all shrubs are in upland habitats and no trimming or removal of elderberry shrubs would occur, take of the VELB would not occur. Therefore, based on the *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle*, the Project would have no effect on VELB and further FESA consultation is not required. In addition, no designated Critical Habitat occurs within the Project area; therefore, no FESA consultation for Project effects to Critical Habitat is required. The incorporation of measures **BIO-1**, **BIO-7**, **BIO-9** and **BIO-11** will directly minimize and avoid any potential impacts to the species. Additionally, **BIO-5** and **BIO-8** will indirectly protect VELB within the BSA.

Migratory Birds

Native birds, protected under the MBTA and similar provisions under CFG code, currently nest or have the potential to nest within the BSA and the Project impact area. During the 2017 biological surveys, evidence of potentially suitable nesting habitat was observed within the trees and shrubs within the BSA. Trees will be removed throughout the Project corridor as a result of the Build Alternative; however, nesting bird surveys will take place prior to removal. With the implementation of **BIO-3** and **BIO-4**, no impacts to MBTA birds are expected.

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.

Level of Significance: Less Than Significant Impact with Mitigation Incorporated.

Required Mitigation: BIO-1 through BIO-12.

No Project Alternative

The multi-use trail would not be constructed; therefore, no potential impacts to special status species or habitat would occur.

Level of Significance: No Impact.

Required Mitigation: None.

Impact BIO-2: Potential to have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Build Alternative

Sensitive Natural Communities

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.

Riparian Habitat

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.

Level of Significance: Less Than Significant Impact with Mitigation Incorporated.

Mitigation Required: BIO-13 through BIO-18.

No Project Alternative

The multi-use trail would not be constructed; therefore, no potential impacts to riparian habitat or sensitive natural communities would occur.

Level of Significance: No Impact.

Required Mitigation: None.

Impact BIO-3: Potential to have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

Build Alternative

A jurisdictional delineation was conducted on May 12, and May 17, 2017 by Dokken Engineering biologists Angela Scudiere and Courtney Owens to identify jurisdictional waters of the U.S. and State associated with the Build Alternative. The results of this jurisdictional delineation and field observations were used to delineate jurisdictional features within the BSA.

Survey Results

Based on survey results, four water features were found within the BSA (USGS 2017; FEMA 2017; and NWI 2017). Of the four features identified within the limits of the BSA, only two are considered waters of the U.S. and State (the Sacramento Drainage Canal and an above-ground storm drainage feature). The remaining two aquatic features identified within the BSA are small, non-jurisdictional, depressional wetland features (Wetland 1 and Wetland 2) (see Figure 14: Vegetation Communities and Waters within the BSA).

Drainage Features

The Sacramento Drainage Canal occurs within the southern terminus of the BSA. Within the BSA, the Sacramento Drainage Canal is earthen bottomed with regularly maintained banks. No riparian vegetation is associated with the canal, but in-channel emergent vegetation is present. Flow directionality within the BSA is in the southward direction. This feature is currently isolated from the Sacramento River (a waters of the U.S. and State) through a lock system adjacent to a water treatement plant, but would have connectivity to the Sacramento River should those locks be removed; therefore, the Sacramento Drainage Canal is considered a water of the U.S. and State.

The above-ground storm drainage feature collects the stormwater run-off from the adjacent urban environment. Flows are generated from sump pumps along the drainage facility in a westward direction and ultimately drain into the Sacramento Drainage Canal. Within the BSA, the feature transitions from a fully concrete-lined drainage channel to an earthen bottomed channel containing in-channel wetland vegetation. Within the area of potential disturbance, the feature is completely concrete lined with no in-channel vegetation. As this feature drains into the Sacramento Drainage Canal, it is considered a jurisdictional water of the U.S. and State. Only a small portion of the channel, located west of Freeport Boulevard and north of 14th Street, contains riparian vegetation. The remainder of the channel is partially lined by ruderal/disturbed grassland and an urban vegetation community (ornamentals and mixed native and non-native oaks).

Depressional Wetland Features

The two depressional wetland features are vegetated with low growing hydrophitic herbs and grasses but provide minimal aquatic habitat and do not hold adequate water to support a wetland community that could be classified as "emergent". The wetlands are isolated, closed depressional features with no downstream surface connectivity to other jurisdictional water features. These features were assessed using the methods described in the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0) (USACE 2008). As these features were found to be consistent

with the definition of a wetland but are completely isolated from waters of the U.S. or State; therefore, they are not considered jurisdictional features.

Project Impacts

It is anticipated that a new bridge would be built across the above-ground storm drainage feature. The new bridge is anticipated to clear-span the drainage and no permanent impacts to jurisdictional waters are anticipated at this location. All impact to the above-ground storm drainage feature will be temporary for a total of 0.01 acre of temporary impacts to waters of the U.S. and State (see Figure 15: Project Impacts to Jurisdictional Waters). No impacts to the Sacramento Drainage Canal are anticipated. A summary of impacts to jurisdictional waters is provided in Table 9.

Jurisdictional Water Feature	Waters of the U.S. & State	
	Permanent Impacts	Temporary Impacts
Above Ground Storm Drainage	0	0.01 acre
Sacramento Drainage Canal	0	0
Total	0 acre	0.01 acre

Table 9. Project Impacts to Jurisdictional Waters

Based on the minimal, temporary impacts to waters of the U.S. and State, the Build Alternative currently qualifies for a non-notifying USACE Nationwide 14 permit. In addition, as some temporary impacts to waters are anticipated, a RWQCB Section 401 Water Quality Certification would be obtained prior to the start of construction. During final design, should temporary impacts to the above-ground storm drainage feature be determined to "substantially adversely affect existing fish or wildlife resources" pursuant to the CFG Code 1602, a Section 1602 Streambed Alteration Agreement would also be acquired from the CDFW.

In addition to full implementation of any permit requirements, the incorporation of measures **BIO-18** will further mitigate any potential impacts to the jurisdictional waters within the Project area.

Level of Significance: Less than Significant with Mitigation Incorporated.

Required Mitigation: BIO-18

No Project Alternative

The multi-use trail would not be constructed; therefore, no potential impacts to federally protected wetlands would occur.

Level of Significance: No Impact.

Required Mitigation: None.

Impact BIO-4: Potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

Build Alternative

The Build Alternative is not anticipated to have any effects to the existing habitat connectivity for birds, fish, or small and medium terrestrial wildlife. The minimal footprint of the proposed multi-use trail would retain habitat connectivity for wildlife moving along the Project corridor. No significant loss of habitat connectivity is anticipated; therefore, this impact is less than significant.

Level of Significance: Less Than Significant.

Required Mitigation: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no potential impacts to migratory fish, wildlife species, or migratory wildlife corridors would occur.

Level of Significance: No Impact.

Required Mitigation: None.

Impact BIO-5: Potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy; ordinance conflicting with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan.

Build Alternative

There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans within or adjacent to the Project area; therefore, the Project would have no impact or conflict with any habitat conservation plan. Moderate to large diameter native oak and non-oak trees species occur within the BSA and the Project alignment. The Build Alternative 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 Build Alternative 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. The City would comply with City Code 12.56.040 prior to removal of the protected trees pursuant to Sacramento City Ordinance 2016-0026, Chapter 12.56 City and Private Protected Trees. Pursuant to City Code 12.56.040, there is no threshold of significance established for the removal of City trees for public projects; therefore, this impact is considered less than significant. To further minimize potential impacts to trees, the City would establish a replacement plan prior to removal of the protected 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. See measure AES-1 in Section 2.1.

Level of Significance: Less than Significant.

Mitigation Required: None.

No Project Alternative

The multi-use trail would not be constructed; therefore, no trees would be removed.

Level of Significance: No Impact.

Required Mitigation: None.

Mitigation Measures

BIO-1: Prior to initiating construction, an ESA fence will be installed around any elderberry shrubs with driplines extending within 20 feet, as feasible, of the Project impact area. All areas to be avoided during construction activities will be fenced and/or flagged as close to construction limits as feasible. The ESA will be positioned as far from the shrubs as practicable and will be installed under the direction of the Project biologist.

BIO-2: In accordance with the *Swainson's Hawk Technical Advisory Committee Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* (2000), protocol level surveys will be conducted during the appropriate survey periods immediately prior to construction to determine presence/absence of the species in areas in proximity to the Sacramento River. If Swainson's hawk nests are discovered within 0.5 mile of the Project area, appropriate protective measures will be developed in coordination with CDFW.

BIO-3: If possible, vegetation removal should occur outside the nesting bird season (February 15th – September 1st). 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.

A minimum 100-foot no-disturbance buffer for songbirds and a 250-foot buffer for raptors must be established around any active nests. The contractor must immediately stop work in the nesting area until the appropriate buffer is established and is prohibited from conducting work that could disturb the birds (as determined by the Project biologist and in coordination with wildlife agencies) in the buffer area until a qualified biologist determines the young have fledged.

BIO-4: If construction on the existing bridge is planned to occur during the swallow nesting season, measures will be taken to avoid impacts to migratory swallows. To protect migratory swallows, unoccupied nests must be removed from the existing bridge structure and swallow exclusionary devices installed prior to the nesting season (February 15th – September 1st). During the nesting season, the bridge structure must be maintained through the active removal of partially constructed nests. Swallows can complete nest construction in approximately 3 days. After a nest is completed, it can no longer be removed until an approved biologist has determined that all birds have fledged, and the nest is no longer being used.

BIO-5: Contract specifications will include the following BMPs, where applicable, to reduce erosion during construction:

- Implementation of the Project will require approval of a site-specific Storm Water Pollution Prevention Plan (SWPPP) that would implement effective measures to protect water quality, which may include a hazardous spill prevention plan and additional erosion prevention techniques;
- Existing vegetation will be protected in place where feasible to provide an effective form of erosion and sediment control; and
- As a permanent BMP, slope roughening by equipment tracking will be implemented to create unevenness on bare soil. Surface roughening reduces erosion potential by decreasing runoff velocities, trapping sediment, and increasing water infiltration.

BIO-6: The contractor must dispose of all food-related trash in closed containers and must remove it from the Project area each day during construction. Construction personnel must not feed or attract wildlife to the Project area.

BIO-7: The Project biologist will periodically inspect the construction areas to ensure elderberry shrubs within the ESA limits are not disturbed.

BIO-8: The Project biologist must conduct pre-construction clearance surveys of the areas of disturbance prior to ground disturbance. Should a sensitive species be observed, the Project will mark the area as an ESA and coordinate with the appropriate wildlife agencies.

BIO-9: All construction personnel will attend an environmental awareness training before conducing work in the Project area. The training program will notify construction personnel of the sensitive biological resources occurring within the Project area, including the VELB, their legal status, and penalties for not complying with the conditions of any permits issued for the proposed Project. During the environmental awareness training, construction personnel will also be briefed on the need to avoid damage to the elderberry host plant and the possible penalties for not complying with these requirements.

BIO-10: If any wildlife is encountered during the course of construction, said wildlife must be allowed to leave the construction area unharmed.

BIO-11: No insecticides, herbicides, fertilizers, or other chemicals that might harm the beetle or its host plant will be used within 100 feet of elderberry shrubs.

BIO-12: Plastic mono-filament netting (erosion control matting) or similar material that could trap wildlife must not be used. Acceptable substitutes include jute, coconut coir matting, or tackified hydroseeding compounds.

BIO-13: To conform to water quality requirements, the SWPPP must include the following:

- Vehicle maintenance, staging and storing equipment, materials, fuels, lubricants, solvents, and other possible contaminants must be a minimum of 50 feet from surface waters. Any necessary equipment washing must occur where the water cannot flow into surface waters.
- The Project specifications will require the contractor to operate under an approved spill prevention and clean-up plan;
- Construction equipment will not be operated in flowing water;
- Construction work must be conducted according to site-specific construction plans that minimize the potential for sediment input to surface waters;
- Raw cement, concrete or concrete washings, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to aquatic life must be prevented from contaminating the soil or entering surface waters;
- Equipment used in and around surface waters must be in good working order and free of dripping or leaking contaminants; and
- Any concrete rubble, asphalt, or other debris from construction must be taken to an approved disposal site.

BIO-14: Should a special status plant species be observed within or immediately adjacent to the Project area, ESA fencing (orange construction barrier fencing) will be installed around special status plant populations, where feasible.

BIO-15: Prior to arrival at the Project site and prior to leaving the Project site, construction equipment that may contain invasive plants and/or seeds will be cleaned to reduce the spreading of noxious weeds.

BIO-16: All hydroseed and plant mixes must consist of a biologist-approved plant palette seed mix of native and sterile species.

BIO-17: The contractor must not apply rodenticide or herbicide within the Project area during construction.

BIO-18: Prior to the start of construction activities, the Project limits in proximity to jurisdictional waters must be marked with high visibility Environmentally Sensitive Area (ESA) fencing or staking to ensure construction will not further encroach into jurisdictional waters.

BIO-19: Prior to tree removal, the Project biologist will conduct surveys to determine if "bat habitat trees" exist within the Project footprint. Potential bat habitat trees typically are mature trees with features such as open cavities, crevices, or loose bark. Potential "bat habitat trees" that will be removed as a result of the Project (including utility relocation), must be removed between September 1st and March 31st outside of the maternity season (April 1st –August 31st). Additional specific tree removal procedures (including potential exclusions, removal of bark et.) will be determined on a case-by-case basis by the Project biologist. Potential bat habitat trees not requiring removal will be protected in place with ESA fencing.

2.4 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

This section describes the environmental and regulatory setting for cultural resources and Tribal Cultural Resources (TCRs). It also describes impacts on cultural resources and TCRs that could result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal

National Historic Preservation Act Section 106

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires Federal agencies to take into account the effects of their undertakings on historic properties and to provide the Advisory Council on Historic Preservation (ACHP) with a reasonable opportunity to comment. In addition, Federal agencies are required to consult on the Section 106 process with State Historic Preservation Offices (SHPO), Tribal Historic Preservation Offices (THPO), Indian Tribes (to include Alaska Natives) [Tribes], and Native Hawaiian Organizations (NHO). This Project will be partially funded using Caltrans Active Transportation Program Cycle 2 funds; therefore, Caltrans is the NEPA lead.

Section 106 Programmatic Agreement

Pursuant to the X.B.1 of the January 2014 First Amended Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act (Section 106 PA), as well as under Public Resources Code 5024 and pursuant to the January 2015 Memorandum of Understanding Between the California Department of Transportation Office Regarding Compliance with Public Resources Code Section 5024 and Governor's Executive Order W-26-92 (5024 MOU), the Caltrans District may make a finding of "No Adverse Effect with Standard Conditions" when standard conditions that will avoid adverse effects to historic properties are imposed in accordance with Attachment 5 of the Section 106 PA. The Caltrans District shall submit its finding and supporting documentation to the Caltrans Cultural Services Office (CSO) for review. Should CSO approve the finding, the undertaking shall not be subject to further review under the Section 106 PA.

National Register Criteria for Evaluation of Historic Resources

Criteria for Evaluation

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of significant persons in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded or may be likely to yield, information important in history or prehistory.

Criteria Considerations

Ordinarily cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- B. A building or structure removed from its original location, but which is primarily significant for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- C. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life; or
- D. A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- E. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- F. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- G. A property achieving significance within the past 50 years if it is of exceptional importance.

State

California Environmental Quality Act (CEQA)

CEQA consists of statutory provisions in the PRC and Guidelines promulgated by the Office of Planning and Research. The CEQA requires public agencies to evaluate the implications of their Project(s) on the environment and includes significant historical resources as part of the environment. A Project that causes a substantial adverse change in the significance of an historical resource has a significant effect on the environment CCR 14 Section 15064.5; California PRC Section 21098.1). CEQA defines a substantial adverse change as follows.

• Physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CCR 14 Section 15064.5[b][1]).

The CEQA Guidelines provide that the significance of an historical resource is materially impaired when a Project results in the following:

- Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources (CRHR); or
- Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to PRC Section 5020.1(k) or its identification in an historical resources survey meeting the requirements of PRC Section 5024.1(g), unless the public agency reviewing the effects of the Project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a Lead Agency for purposes of CEQA (CCR 14 Section 15064.5[b][2]).

California Register of Historical Resources: Public Resources Code Section 5024

The term historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of PRC (PRC Section 5020.1[j]).

Historical resources may be designated as such through three different processes:

- 1. Official designation or recognition by a local government pursuant to local ordinance or resolution (PRC Section 5020.1[k]);
- 2. A local survey conducted pursuant to PRC Section 5024.1(g); or
- 3. The property is listed in or eligible for listing in the NRHP (PRC Section 5024.1[d][1]).

The process for identifying historical resources is typically accomplished by applying the criteria for listing in the CRHR, which states that a historical resource must be significant at the local, state, or national level under one or more of the following four criteria.

It is associated with events that have made a significant contribution to the broad patterns of:

- 1. California's history and cultural heritage;
- 2. It is associated with the lives of persons important in our past;
- 3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
- 4. It has yielded, or may be likely to yield, information important in prehistory or history. (CCR 14 Section 4852).

To be considered a historical resource under the CEQA, the resource must also have integrity, which is the authenticity of a resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the criteria under which a resource is eligible for listing in the CRHR (CCR 14 Section 4852[c]).

Assembly Bill 52 (Public Resources Code Section 21084.2)

Effective July 1, 2015, CEQA was revised to include early consultation with California Native American tribes and consideration of TCRs. These changes were enacted through Assembly Bill 52 (AB 52). By including TCRs early in the CEQA process, AB 52 intends to ensure that local and Tribal governments, public agencies, and Project proponents would have information available, early in the Project planning process, to identify and address potential adverse impacts to TCRs. The CEQA now establishes that a "Project with an effect that may cause a substantial adverse change in the significance of a TCR is a Project that may have a significant effect on the environment" (PRC § 21084.2).

To help determine whether a Project may have such an adverse effect, the PRC requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project. The consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or environmental impact report is required for a Project (PRC § 21080.3.1). Consultation must consist of the lead agency providing formal notification, in writing, to the tribes that have requested notification for proposed projects within their traditionally and culturally affiliated area. AB 52 stipulates that the Native American Heritage Commission (NAHC) shall assist the lead agency in identifying the California Native American tribes that are traditionally and culturally affiliated within the Project area. If the tribe wishes to engage in consultation on the Project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification. Once the lead agency receives the tribe's request to consult, the lead agency must then begin the consultation process within 30 days. If a lead agency determines that a Project may cause a substantial adverse change to TCRs, the lead agency must consider measures to mitigate that impact.

Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a TCR, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC § 21080.3.2). Under existing law, environmental documents must not include information about the locations of an archaeological site or sacred lands or any other information that is exempt from public disclosure pursuant to the Public Records act. TCRs are also exempt from disclosure. The term "tribal cultural resource" refers to either of the following:

Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

- Included or determined to be eligible for inclusion in the California Register of Historical Resources
- Included in a local register of historical resources as defined in subdivision (k) of California Public Resources Code (PRC) Section 5020.1
- A resource determined by a California lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of the PRC Section 5024.1.

Discovery of Human Remains

Section 7050.5 of the California Health and Safety Code (CHSC) states the following regarding the discovery of human remains:

- a. Every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor, except as provided in Section 5097.99 of the [PRC]. The provisions of this subdivision shall not apply to any person carrying out an agreement developed pursuant to subdivision (I) of Section 5097.94 of the [PRC] or to any person authorized to implement Section 5097.98 of the [PRC].
- b. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the California Government Code [CGC], that the remains are not subject to the provisions of Section 27491 of the CGC or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or to the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains.
- c. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) (CHSC Section 7050.5).
- d. Of particular note to cultural resources is subsection (c), which requires the coroner to contact the NAHC within 24 hours if discovered human remains are determined to be Native American in origin. After notification, NAHC will follow the procedures outlined in PRC Section 5097.98, which include notification of most likely descendants (MLDs), if possible, and recommendations for treatment of the remains. The MLD will have 24 hours after notification by the NAHC to make their recommendation (PRC Section 5097.98). In addition, knowing or willful possession of Native American human remains or artifacts taken from a grave or cairn is a felony under State law (PRC Section 5097.99).

Local

Old Sacramento State Historic Park General Plan and FEIR (2014)

The Old Sacramento State Historic Park General Plan Final EIR (2014 FEIR) identifies planned recreational uses or facilities for the OSSHP corridor. The approved 2014 FEIR is the current planning document for planned uses of the historic rail corridor. The 2014 FEIR 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).

City of Sacramento 2035 General Plan (2015)

The following City of Sacramento 2035 General Plan, Historic and Cultural Resources (HCR) Element, goals and policies are applicable to cultural resources.

Goal HCR 2.1 Identification and Preservation of Historic and Cultural Resources. Identify and preserve the City's historic and cultural resources to enrich our sense of place and our understanding of the city's prehistory and history.

Policy HCR 2.1.1 Identification. The City shall identify historic and cultural resources including individual properties, districts, and sites (e.g., archaeological sites) to provide adequate protection of these resources.

Policy HCR 2.1.2 Applicable Laws and Regulations. The City shall ensure compliance with City, State, and Federal historic preservation laws, regulations, and codes to protect and assist in the preservation of historic and archaeological resources, including the use of the California Historical Building Code as applicable. Unless listed in the Sacramento, California, or National registers, the City shall require discretionary Projects involving resources 50 years and older to evaluate their eligibility for inclusion on the California or Sacramento registers for compliance with the California Environmental Quality Act.

Policy HCR 2.1.3 Consultation. The City shall consult with appropriate organizations and individuals (e.g., California Historical Resources Information System (CHRIS) Information Centers, the NAHC, the CA Office of Planning and Research (OPR) "Tribal Consultation Guidelines", etc.,) and shall establish a public outreach policy to minimize potential impacts to historic and cultural resources.

Policy HCR 2.1.10 Early Consultation. The City shall minimize potential impacts to historic and cultural resources by consulting with property owners, land developers, and the building industry early in the development review process.

Policy HCR 2.1.11 Compatibility with Historic Context. The City shall review proposed new development, alterations, and rehabilitation/remodels for compatibility with the surrounding historic context. The City shall pay special attention to the scale, massing, and relationship of proposed new development to surrounding historic resources.

Policy HCR 2.1.13. Historic Surveys and Context Statements. Where historic resource surveys may no longer be valid, or for areas that have not been surveyed, the City shall seek funding to prepare new historic context surveys. In these surveys, the potential eligibility of all properties 45 years and older for listing in National, California, or Sacramento registers shall be evaluated.

Policy HCR 2.1.16 Archaeological and Cultural Resources. The City shall develop or ensure compliance with protocols that protect or mitigate impacts to archaeological and cultural resources including prehistoric resources.

Historic Preservation Zoning Ordinance

The City of Sacramento's historic preservation program began in 1975 with the enactment of the City's first Historic Preservation Ordinance. The current Historic Preservation Ordinance (No. 2006-063) was enacted in October 2006. The purpose of the Historic Preservation Ordinance is to do the following: identify,

protect, and encourage the preservation of significant resources; maintain an inventory and ensure the preservation of these resources; encourage maintenance and rehabilitation of the resources; encourage retention, preservation, and re-use of the resources; safeguard city resources; provide consistency with state and federal regulations; protect and enhance the city's attraction to tourists; foster civic pride in the city's resources; and encourage new development to be aesthetically compatible.

Environmental Setting

In accordance with the CEQA, the Project Area Limits (PAL) for the Build Alternative was established in consultation with Caltrans and the City. The PAL is the same as the Project study area which is included in Figure 3.

The horizontal extent of the PAL was established as the area of direct and indirect effects which encompasses an area of approximately 103 acres. The PAL includes the 4.8-mile length of the Walnut Grove Branch Line of the Southern Pacific Railroad between 11th Ave. and 350 feet south of where I-5 crosses over Freeport Blvd. in Sacramento County. The PAL includes all track removal, right-of-way acquisition areas, trail paving, street crossings, landscaping, drainage facilities, culvert and pipe installation, roadway cut and fill limits, buried utility relocation, vegetation/tree removal, equipment and materials staging, temporary construction easements, and construction access (see Figure 3). The anticipated maximum vertical extent of the PAL consists of a section of berm that would be lowered by approximately 10 feet to accommodate ADA compliance. The majority of the Project area has a vertical PAL of 6-12 inches, though some areas could be as high as 5 feet below the existing ground surface (bgs) needed to accommodate ground disturbance related to trail grading, drainage fill placement compaction, and vegetation clearing/grubbing. Any location where the vertical PAL is greater than 6 inches will be located within the human-made railroad grade. The vertical PAL extends 6 inches bgs in the berm, as this is the maximum extent of potential impacts to the berm.

Background research was conducted to identify previous studies and recorded cultural resources within, and adjacent to, the PAL. The background research consisted of a record search, literature and map review, and consultation with the NAHC and Native American groups.

Records Search

Dokken Engineering obtained a records search for the Project area and a ¼-mile radius surrounding the Project area from the North Central Information Center (NCIC) at California State University, Sacramento on June 22, 2017. The records search was conducted by Nathan Hallam from the NCIC. The search examined the Office of Historic Preservation (OHP) Historic Properties Directory, OHP Determinations of Eligibility, and California Inventory of Historical Resources. Dokken Engineering staff reviewed historical literature and maps, Caltrans Bridge Inventory listings, General Land Office (GLO) and/or Rancho Plat Maps, and soil survey maps. The records search conducted at the NCIC identified five prehistoric cultural resources (including one that was mismapped) and five historic-era cultural resources within ¼-mile of the PAL, as well as two historic-era resources adjacent to the PAL, and one historic-era resource within the PAL. The historic-era resource within the PAL is the National Register-eligible Walnut Grove Branch of the Southern Pacific Railroad. The Walnut Grove Branch Line of the Southern Pacific Railroad is a National Register-eligible railway line that has been inactive and abandoned since 1978. The tracks originally ran from Walnut Grove to Sacramento to transport agricultural goods from the Delta Region to Sacramento. The tracks run throughout the entire PAL.

Native American Outreach (AB52)

On June 19, 2017, Dokken Engineering sent a letter and a map depicting the Project vicinity to the NAHC in West Sacramento, asking the commission to review the Sacred Lands File (SLF) for any Native American cultural resources that might be affected by the Build Alternative (see Appendix G). A list of Native American individuals who might have information or concerns about the Project was also requested. On June 21, 2017, Sharaya Souza, Staff Services Analyst for the NAHC, informed Dokken Engineering via email that a review of the SLF was completed and the Project vicinity was culturally

sensitive, and to contact Chairperson Crystal Martinez-Aire of the Ione Band of Miwok Indians and Jason Camp of the United Auburn Indian Community (UAIC).

On July 11, 2017, initial consultation letters were sent to the Native American individuals on the list provided by the NAHC as well as Mr. Camp, who was not included in the NAHC contact list. The letters provided a summary of the Build Alternative and requested information regarding comments or concerns the Native American community might have about the Project (see Appendix G). For those individuals that did not reply to the letter, telephone calls were placed on August 15, 2017 and September 14, 2017. The following discussion presents a summary of consultation efforts for each individual on the list provided by the NAHC.

- Rhonda Morningstar Pope, Chairperson, Buena Vista Rancheria. On July 17, 2017, Mike Despain called and stated that the Project area is fairly disturbed but requested that mitigation measures include reference to CFR 7050.5 regarding human remains. Additionally, if any Native American resources are encountered during construction, Mr. Despain requested that the Buena Vista Rancheria be contacted.
- Crystal Martinez-Aire, Chairperson, Ione Band of Miwok Indians. There was no response to the initial letter. A follow-up phone call was placed on August 15, 2017. The administration assistant stated that Randy Yonemura will be the point of contact for this Project. No further contact with Chairperson Martinez-Aire will occur as part of this Project.
- Randy Yonemura, lone Band of Miwok Indians. There was no response to the initial letter. A follow-up phone call was placed on August 15, 2017. There was no response and a detailed message was left. Mr. Yonemura returned the call on August 23, 2017. Mr. Yonemura stated that the Project vicinity is of concern for the Tribe. He requested copies of the maps and a meeting to discuss these locations. Maps were emailed to Mr. Yonemura that same day. Emails were sent to Mr. Yonemura on August 31, September 6, and September 11, 2017, requesting meeting availability. Mr. Yonemura replied on August 31, 2017, stating that he needed to check his calendar and would send meeting dates the following week. There have been no other emails from Mr. Yonemura.

In a phone conversation with Mr. Yonemura on September 18, 2017, he said that he would call later in the week with possible meeting times. The meeting with Mr. Yonemura occurred on September 21, 2017. During this meeting, the cultural sensitivity of the Project vicinity was discussed. Mr. Yonemura wanted time to examine and markup maps and meet again. Phone calls and emails were sent to Mr. Yonemura on October 2, 10, and 20, 2017, requesting additional meeting times to review the maps; however, no response has been returned, to-date regarding the status of marked maps.

A phone call was placed on November 1, 2017, to Mr. Yonemura explaining that Phase II hazardous waste testing and inviting him to monitor the testing. During this call and a call on November 7, 2017, Mr. Yonemura stated that he will be monitoring the testing on November 10, 2017. An email was received on November 7, 2017, from Roger Aguilar, on behalf of Mr. Yonemura, requesting information regarding rates of pay for the monitoring of hazardous waste testing. Mr. Yonemura and Mr. Aguilar were informed that the City does not reimburse for monitoring of hazardous wasted testing. Mr. Aguilar requested consultation with the Caltrans official in this matter. Caltrans archaeologist, David Price, responded to Mr. Yonemura on November 10, 2017, that Caltrans will not reimburse for monitoring because the testing is minimally invasive and is taking place in a disturbed context.

On November 10, 2017, no Tribal monitor of the lone arrived to monitor the hazardous waste testing. The archaeological monitor, Brian S. Marks, emailed Mr. Yonemura and Mr. Aguilar as to the status and location of the testing throughout the day to keep them apprised of the situation. No cultural material was observed during testing, and there was no email reply. On November 12, 2017, Mr. Aguilar emailed to request information regarding the next phase of the Project, and email reply was sent that same day that he would be kept up to date with the progress of the Project. On November 21, 2017, a digital version of the monitoring results was emailed to Mr. Yonemura and Mr. Aguilar.

- Cosme Valdez, Interim Chief Executive Officer, Nashville-El Dorado Miwok. There was no response to the initial letter. A follow-up phone call was placed on August 15, 2017. There was no answer and detailed message was left on a voice mail. A second follow-up phone call was placed on September 14, 2017. There was no answer and detailed message was left on a voice mail.
- Nicholas Fonseca, Chairperson, Shingle Springs Band of Miwok Indians. An email was received by Kara Perry on behalf of Chairperson Fonseca on July 18, 2017 regarding the proposed Project. Ms. Perry stated that the Project area is of concern to the Tribe. Therefore, the Shingle Springs Band of Miwok Indians requested that they be afforded a tribal monitor during ground-disturbing activities. An email reply was sent that same day to Ms. Perry informing her that the impacts to the levee will be minimal and that the majority of the work will be in the berm of the abandoned railroad. An email was sent on September 19, 2017, inquiring about information of Native American Resources within the PAL. Ms. Perry requested a copy of the maps for the Project that same day, which were sent to her immediately. Ms. Perry replied on September 26, 2017 and requested Tribal monitoring north of Fruitridge Road. An email was sent on November 7, 2017, to invite the Tribe to monitor Phase II hazardous waste testing. She replied inquiring about when they would get the results. An email was sent on November 21, 2017, with a digital copy of the monitoring results.
- Don Ryberg, Chairperson, T'si-Akim Maidu. There was no response to the initial letter A follow-up phone call was placed on August 15, 2017. There was no answer and detailed message was left on a voice mail. A second follow-up phone call was placed on September 14, 2017. There was no answer and detailed message was left on a voice mail.
- *Grayson Coney, Cultural Director, T'si-Akim Maidu.* There was no response to the initial letter. A follow-up phone call was placed on August 15, 2017. There was no answer and detailed message was left on a voice mail. A second follow-up phone call was placed on September 14, 2017. Mr. Coney expressed that the Project area was of concern to the Tribe and requests that all the workers be given cultural awareness training. If anything is found during construction, he requested to be contacted.
- Gene Whitehouse, Chairperson, UAIC. A reply was received via email on July 11, 2017 from Cherilyn Neider as part of AB 52 consultation, on behalf of Chairperson Whitehouse and Marcos Guerrero (UAIC Cultural Resources Manager) and requested to be part of the pedestrian survey. She also requested cultural documentation record search results and GIS files. Ms. Neider accompanied Dokken Engineering archaeologists on the pedestrian survey on July 19, 2017 and surveyed portions of the PAL that were of cultural interest. After the survey, Ms. Neider stated that the UAIC would like to have monitors present on ground-disturbing activities deeper than 6 inches on the Sacramento River Levee at the end of Sutterville Road, at the excavation of the berm near the proposed realignment of Normandy Lane, and the area south of the entrance to the waste treatment facility.

GIS files were provided on July 13, 2017, and records search results were provided that same day. An email was received from Matthew Rippy on July 27, 2017, requesting that the possible isolates they observed during the pedestrian inspection be noted on the map. Mr. Guerrero surveyed the Project area on August 28, 2017 and stated that all ground disturbance is located within a railroad berm and that no Tribal monitoring is necessary for the propose Project. A phone call and an email were sent on September 14, 2017, and another email was sent on September 20, 2017 to Cherilyn Neider requesting the status of Section 106 consultation. She replied on October 5, 2017, stating that the mitigation measures associated with AB 52 be included. These measures request that the UAIC be notified of ground-disturbing activities and that they be afforded the opportunity to investigate ground disturbances. An email was sent on November 7, 2017 to invite the UAIC to monitor Phase II hazardous waste testing with a copy of the testing map. A reply was received that same day inquiring about when they would get the results. An email was sent on November 21, 2017 with a digital copy of the monitoring results.

• Jason Camp, THPO, UAIC. There was no response to the initial letter. Based on a conversation with Cherilyn Neider, Marcos Guerrero would be the point of contact for this Project.

• Raymond Hitchcock, Chairperson, Wilton Rancheria. There was no response to the initial letter. A follow-up phone call was placed on August 15, 2017. The call was transferred to Antonio Ruiz, the cultural resource officer for Wilton Rancheria. There was no answer and detailed message was left on a voice mail. A second follow-up phone call was placed on September 14, 2017. There was no answer and Mr. Ruiz's mail box was full, so a message was left on Ed Silva's mailbox.

Summary of Historical Society Consultation

The Project proponents have conducted several public meetings and have contacted several historical societies, including the Sacramento Historical Society, Preservation Sacramento, Center for Sacramento History, California State Railroad Museum and Foundation Library, Sacramento State University Library, California State Library, California State Archives, and Sacramento River Delta Historical Society. These societies and groups did not reveal any the presence of any archaeological sites; however, they did discuss concern for the Walnut Grove Branch Line Railroad.

Field Methods and Results

Archaeologists Dr. Brian S. Marks and Amy Dunay conducted archaeological field surveys of the PAL on July 19, and 20, 2017, as well as October 12, and 26, 2017. The PAL was surveyed using 15-meter wide transect intervals, oriented roughly parallel with the railroad tracks. Periodic boot scrapes were used in areas of dense vegetation to expose the ground surface. All Project area conditions and cultural resources were fully recorded in the field notes.

In addition to the archaeologists, two members of the UAIC, Cherilyn Neider and Matthew Rippy, participated in the pedestrian survey serving as Native American Monitors during the July 19th survey. They walked between the archaeologists, who were no more than 15 meters apart.

Exposed subsurface cuts, such as ditches, roadway cuts, and bank cuts were visually examined for the presence of archaeological resources, soil color change, and/or staining that could indicate past human activity or buried deposits.

During Phase II testing for hazardous waste on November 10, 2017, an archaeological monitor was present to document if any cultural material was extracted from the testing areas. The testing was conducted with a 3-inch diameter hand augur to a depth of approximately 18 inches below the rock ballast associated with the railroad. A total of 10 tests were performed throughout the Project area (see Figure 17). The material extracted from the tests that was not needed for sampling was screened through 1/8" mesh.

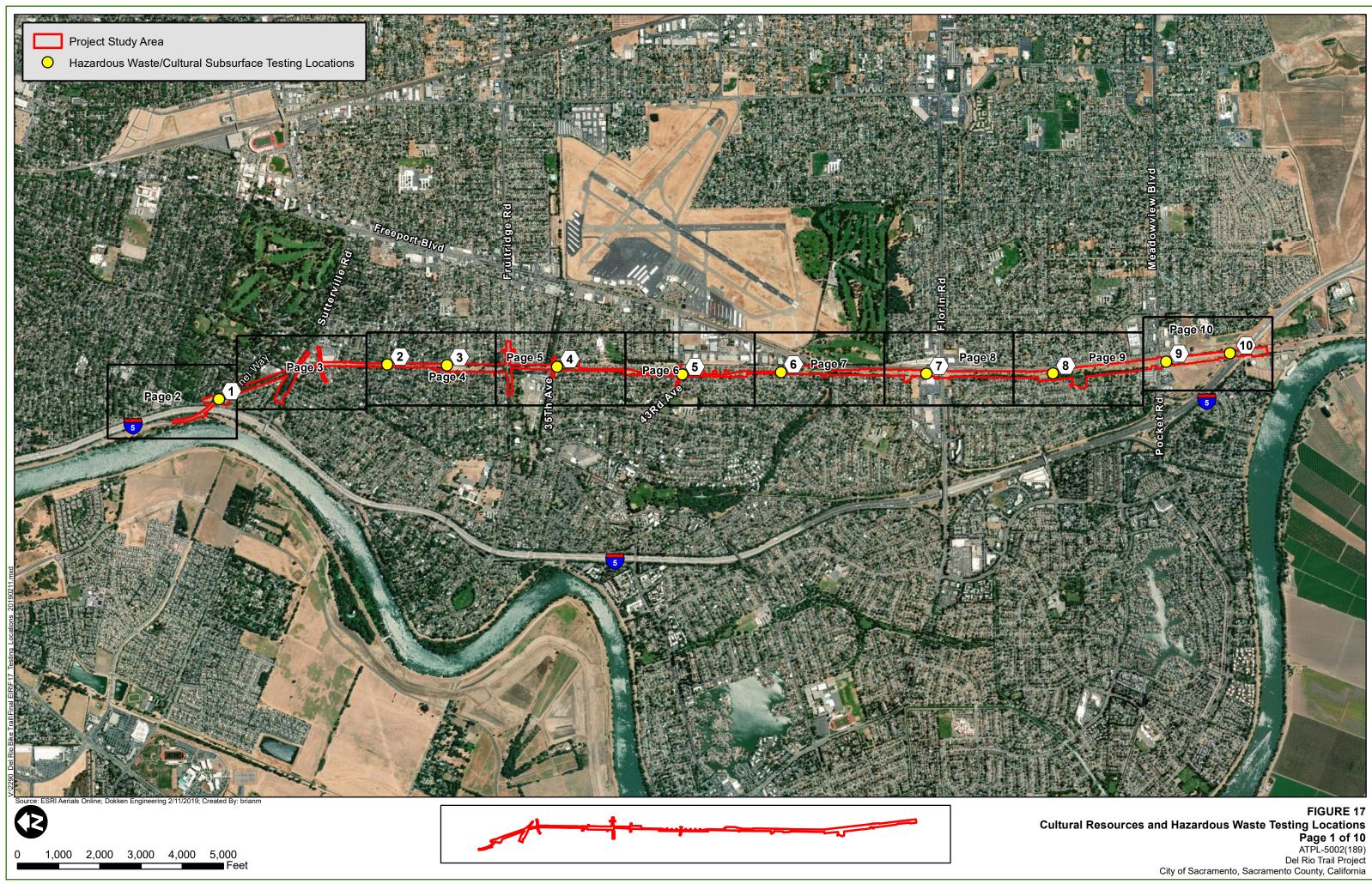
Results

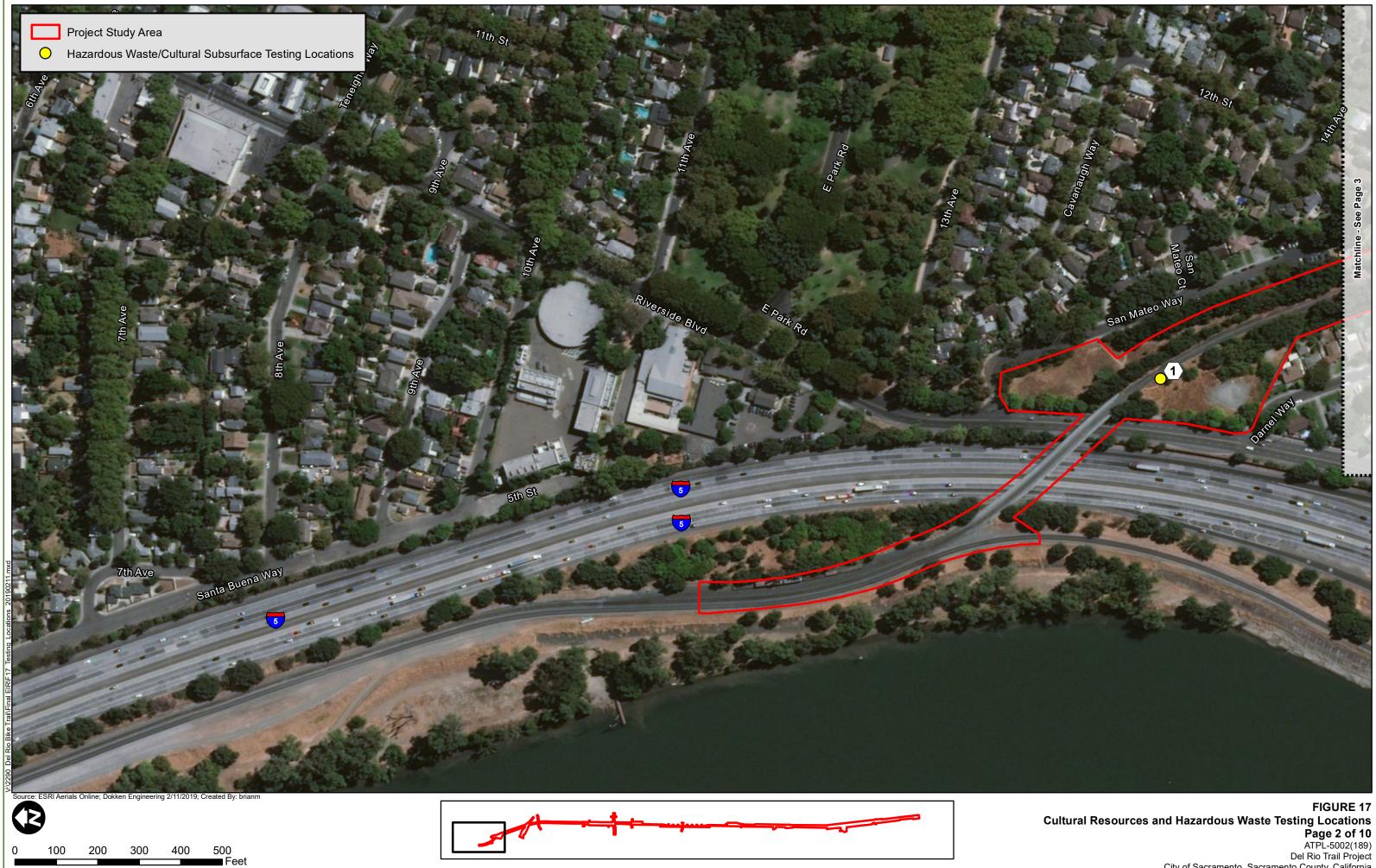
The pedestrian surveys were conducted on July 19, and 20, 2017, as well as October 12, and 26, 2017. Surveyors did not observe any cultural resources within the PAL other than the abandoned railroad track.

The pedestrian survey confirmed that the terrain has been subjected to intense modification during the construction of the railroad. The railroad was atop a grade for the majority of the Project area. The only exception was an 800-foot section in the area roughly between Claremont Way and Birchwood Lane (approximately 900 feet south of South Land Park Drive where the railroad had been cut into a hill that extended to the east.

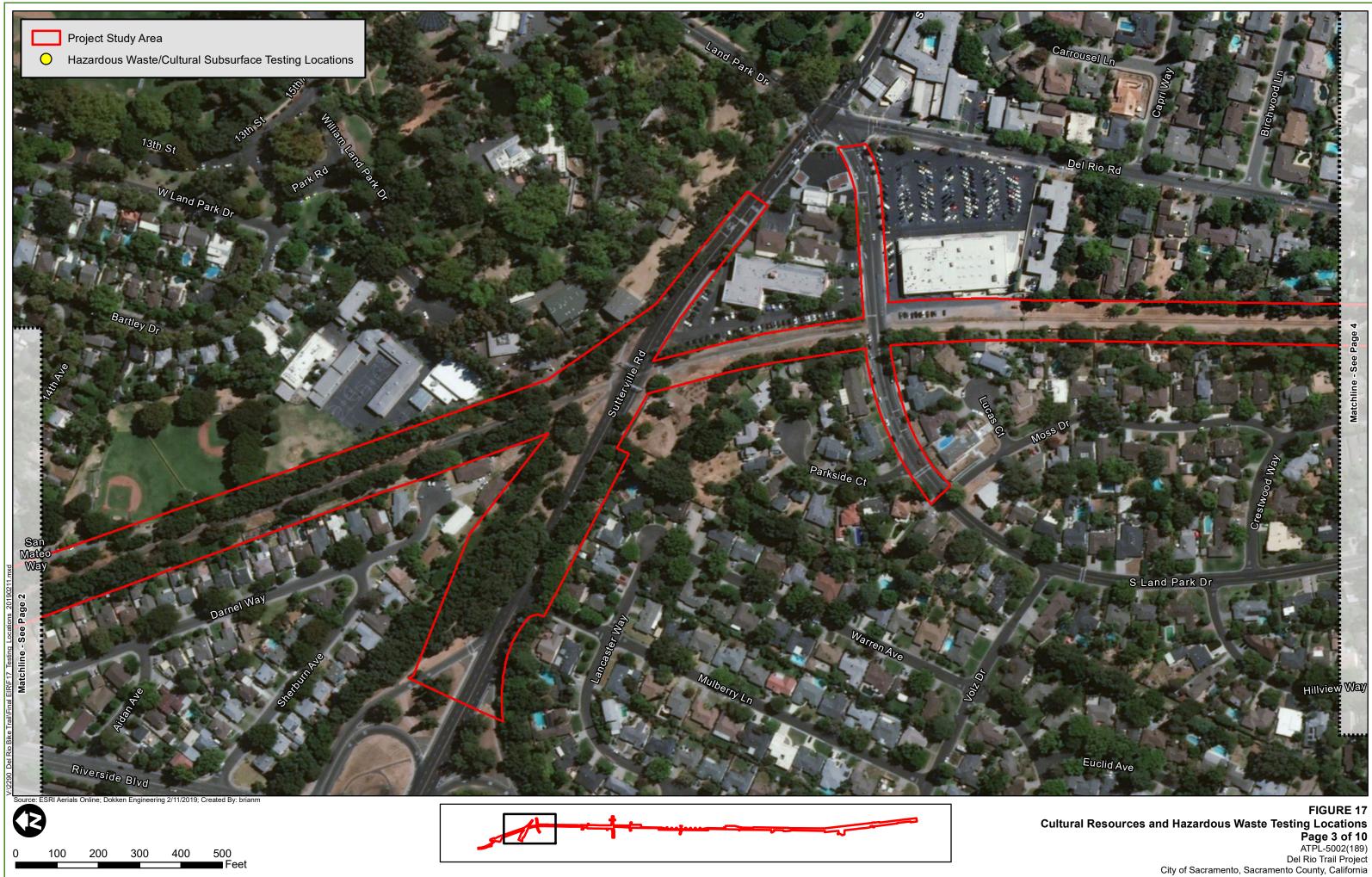
No cultural resources were found within the testing samples. The Native American monitors noted several possible isolated artifacts within the Project corridor. These possible isolated artifacts were separated by as much as 3 miles and were located along the human-made berm and within an excavated drainage, out of context. As per Attachment 4 of the Programmatic Agreement, these possible isolated artifacts are exempt from evaluation. Additionally, during AB 52 consultation, the UAIC determined that these possible isolated artifacts were not connected to TCRs and the UAIC had no concerns with the proposed Project. No other indications of prehistoric habitation were observed.

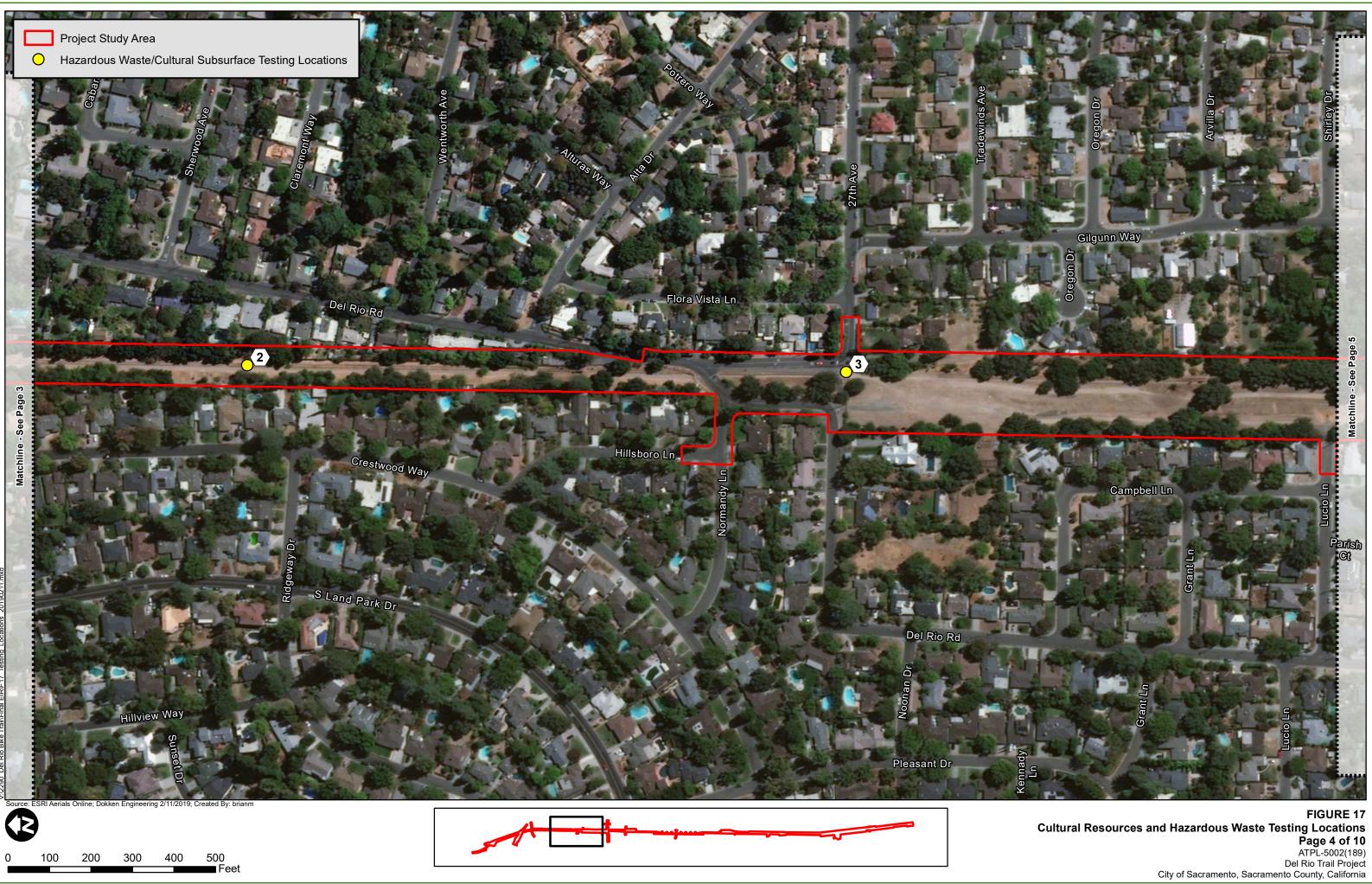
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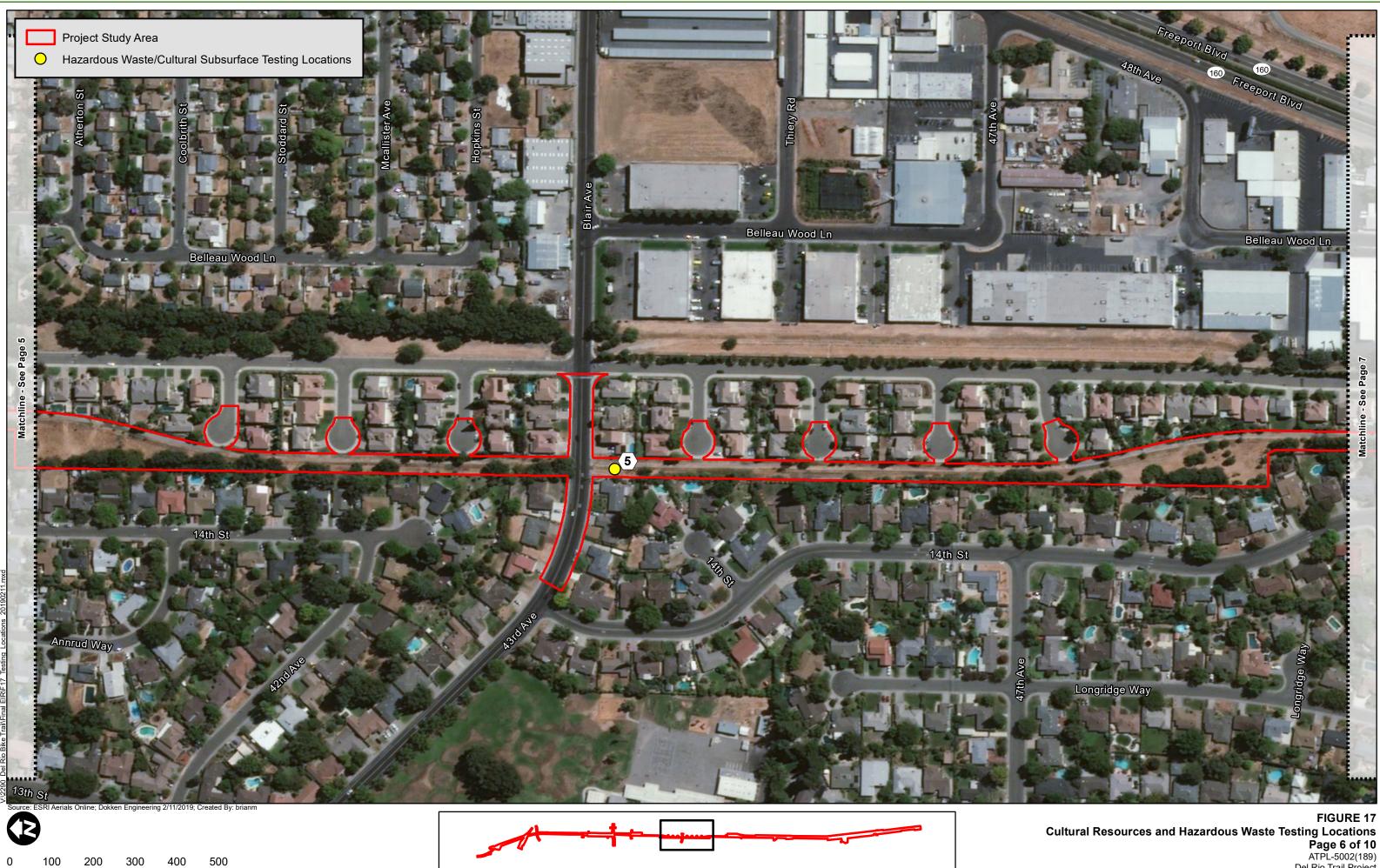
Cultural Resources and Hazardous Waste Testing Locations Page 2 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California







Cultural Resources and Hazardous Waste Testing Locations Page 5 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California



Feet

Cultural Resources and Hazardous Waste Testing Locations Page 6 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

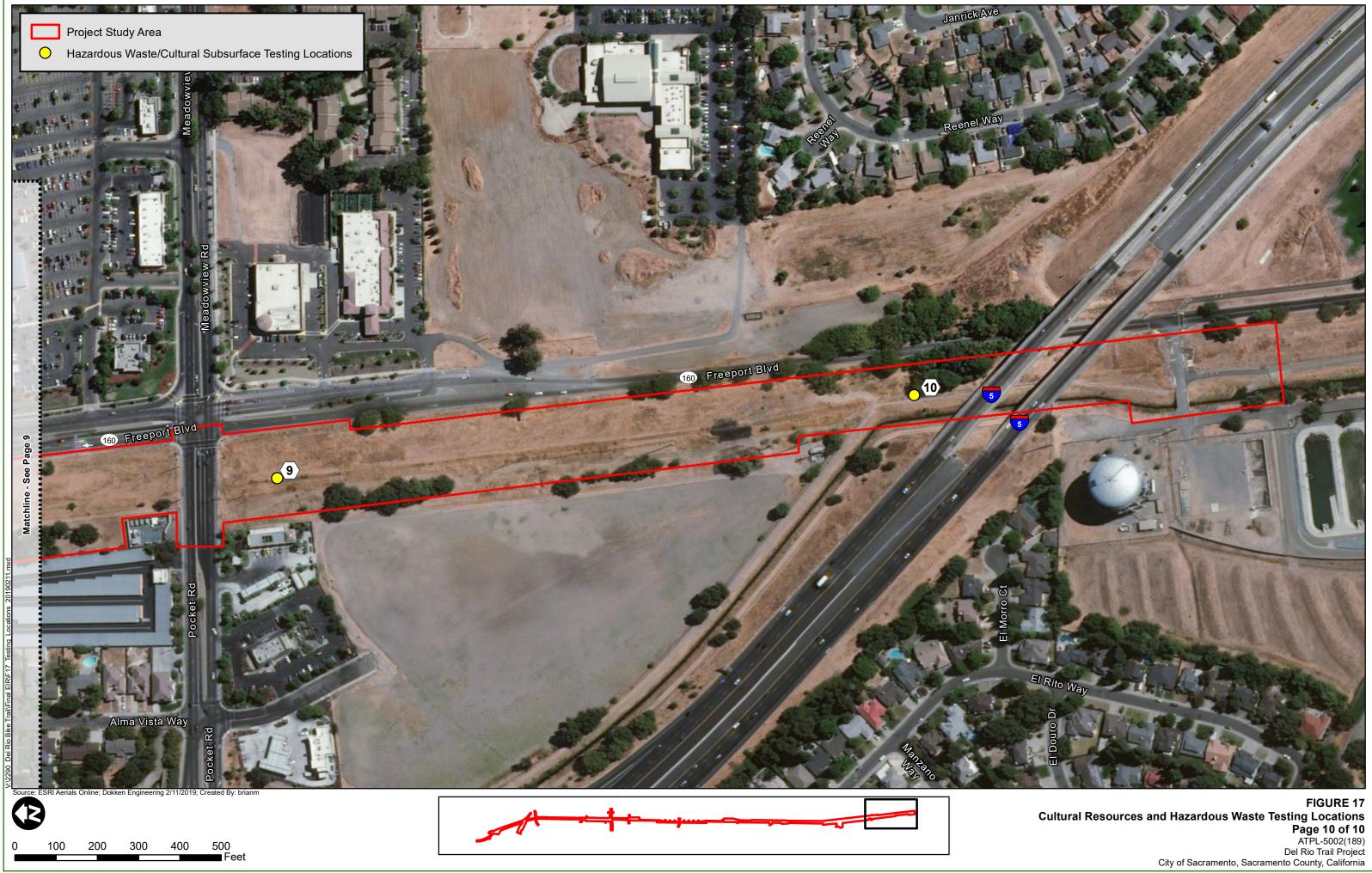


Cultural Resources and Hazardous Waste Testing Locations Page 7 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California



Cultural Resources and Hazardous Waste Testing Locations Page 8 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California





Historic Eligibility of the Walnut Grove Branch Line of the Southern Pacific Railroad

The PAL for the Build Alternative includes a segment of one historic property: the Walnut Grove Branch Line of the Southern Pacific Railroad. GPA Consulting Senior Architectural Historian, Laura O'Neill, prepared a Finding of Effect report in August of 2018 to evaluate the potential impacts of the proposed Project on the historic property.

<u>History</u>

The original extent of the branch line was documented in a National Register nomination in 1991 by Mary L. Maniery of PAR Environmental Services, Inc. as part of the Sacramento Urban Area Flood Control Project. When evaluated within its historic context, a property must be shown to be significant for one or more of the four Criteria for Evaluation - A, B, C, or D (listed earlier in the Federal Regulatory Framework section). The Criteria describe how properties are significant for their association with important events or persons, for their importance in design or construction, or for their information potential. Maniery concluded that the

original extent of the branch line appeared eligible at the local level for its significance under Criteria A and C for its association with the development of the region and for embodying a distinctive construction method of the era. In a letter dated April 24, 1991, SHPO at the time, Kathryn Gualtieri, stated that the consultant was "well justified" in concluding that the Walnut Grove Branch Line should be considered eligible and requested additional documentation of its physical condition. Any follow-ups to that letter are unclear; however, the subsequent SHPO Milford Wayne Donaldson clarified the matter in a letter dated October 23, 2006 regarding the Freeport Regional Water Project in Sacramento and San Joaquin Counties, and concurred that the resource was eligible for the NRHP under Criteria A and C. The status code for the resource is 2S2.

Thus, the segment within the PAL is a historic property for the purposes of complying with Section 106 of the NHPA and is a historical resource for the purposes of complying with the CEQA. The period of significance for the property is 1908 to 1934. The boundaries of the property consist of its original 24.5-mile route.¹ The Walnut Grove Branch Line is a 24.5-mile line that was constructed between Sacramento and Walnut Grove in Sacramento County, California. The northernmost point of the line was at the intersection of I Street and Front Street (near the present-day California State Railroad Museum) and continued generally south on the east side of the Sacramento River before terminating at the north end of Walnut Grove.²

Per the National Register Nomination Form prepared by Ms. Maniery, the branch line was constructed between 1908 and 1912 to link agricultural communities in the Sacramento River Delta to Sacramento and more remote markets. This connection and new shipping capability played an important role in boosting agricultural and economic development in the region, including canning and packing endeavors, as well as the formation of several Sacramento River Delta towns, specifically Locke, Hood, and Freeport. The line was found eligible under Criterion A at the local level for its direct association with the agricultural development of the Delta region.³

Massive dredging equipment was used to construct the line, the majority of which was placed on an elevated embankment. These methods were innovative for the era and embody the distinctive characteristics of a period and method of construction. The line was found eligible under Criterion C for these characteristics.⁴

¹ The line was extended south of Walnut Grove in 1929 and again in 1943, ultimately terminating eight miles south of Walnut Grove at Isleton. In the 1970s, this later addition to the line was compromised by flooding and was no longer present or no longer retained integrity by the time of the 1991 documentation. Maniery, 8.

² Maniery, 6.

³ Maniery, 4.

⁴ Ibid.

The period of significance was established as 1908, the year construction began, to 1934, the year Southern Pacific terminated passenger service and reduced the number of freight trains operating on the line after the region was hit by the Great Depression.⁵

Segment Within the PAL

The segment of the Walnut Grove Branch line present within the PAL is an approximately 4.8-mile portion of the larger resource. The north end of the segment within the PAL crosses over I-5 near the intersection of Riverside Boulevard and 13th Street. The segment continues generally south through a series of residential tracts, crosses the major intersection of Meadowview Road and Freeport Boulevard, and runs under the Freeport Boulevard Overhead before terminating adjacent to the Sacramento Water Tower (see Figure 3). The segment consists of a single track of standard-gauge railway⁶ with wood ties, metal rails, and gravel ballast (see Image 1 through Image 4). The segment is on varied terrain. Some of the segment is elevated on an embankment created at the time of construction; other portions of the segment are level with its surroundings while there are further variations in grade such as a non-original overcrossing at I-5 (see Image 5), and notable slope at 27th Avenue (see Image 6).



Image 1: Walnut Grove Branch Line Railroad, view looking south from Sutterville Road. Source: GPA Consulting, 2017.



Image 2: Walnut Grove Branch Line Railroad, detail view of typical conditions, along 27th Avenue. Source: GPA Consulting, 2017.



Image 3: Walnut Grove Branch Line Railroad, detail view of typical conditions, near 27th Avenue. Source: GPA Consulting, 2017.



Image 4: Walnut Grove Branch Line Railroad, detail view of typical conditions, near Park Village Street. Source: GPA Consulting, 2017.

⁵ Ibid., 13.

⁶ Donald B. Robertson, *Encyclopedia of Western Railroad History Volume IV: California* (Caldwell, Idaho: Caxton Printers, LTD, 1998), 197.



Image 5: Walnut Grove Branch Line Railroad, Land Park UP (Bridge No. 0226), view looking north from Riverside Boulevard. Source: GPA Consulting, 2017.



Image 6: Walnut Grove Branch Line Railroad, view looking northwest from 27th Avenue. Source: GPA Consulting, 2017.

The following features qualify the segment for the National Register. They have been ranked by how strongly they convey the significance of the segment:

- Most Significant:
 - Location and track alignment
 - Elevated embankment (intermittent)
- Significant:
 - Standard gauge rails

Gravel ballast

- $\circ \quad \text{Wood ties} \quad$
- Less Significant:
 - Agricultural setting

Integrity Statement

The segment of the Walnut Grove Branch Line within the PAL was examined by GPA Consulting according to the seven aspects of integrity: location, setting, design, materials, workmanship, feeling, and association.

Location

Research indicates that the integrity of location is generally intact. The majority of the segment's alignment has not been moved since its completion in 1912. A portion of the alignment was altered and elevated over I-5 sometime after 1967, following the completion of the interstate (see Image 7 through Image 10). Another portion was moved slightly west to accommodate a mid-twentieth century housing development. This change took place sometime between 1967 and 1975. Research did not indicate any further changes to the alignment within the PAL, and the integrity of location is otherwise intact. The location of the resource helps to convey a sense of why the railroad branch line was constructed and the subsequent impact it had on the region.

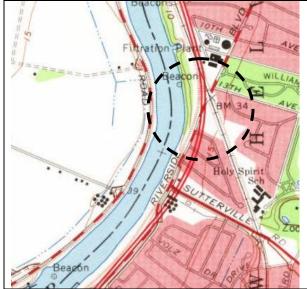


Image 7: Sacramento West Quadrangle, 1967. Minor alignment change circled with dashed line.

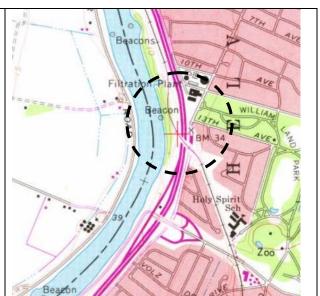
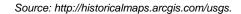


Image 8: Sacramento West Quadrangle, 1967. Photo Revised 1980. Minor alignment change circled with dashed line.



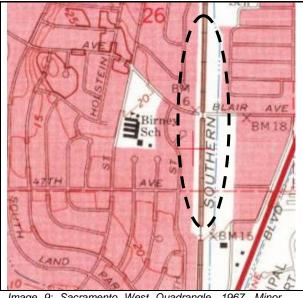


Image 9: Sacramento West Quadrangle, 1967. Minor alignment change circled with dashed line.

Source: http://historicalmaps.arcgis.com/usgs.

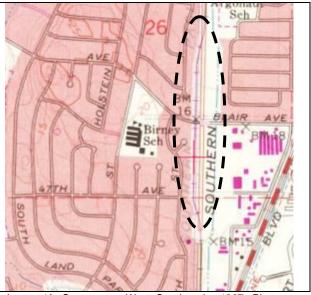


Image 10: Sacramento West Quadrangle, 1967. Photo Revised 1980. Minor alignment change circled with dashed line.

Source: http://historicalmaps.arcgis.com/usgs.

Design

The integrity of design is generally intact. Although original wood overcrossings at Sutterville Road, 35th Avenue, and 43rd Avenue were replaced with a culvert and filled, or lowered to grade in the 1960s⁷ (see Image 11 through Image 14), the combination of the remaining elements, including the alignment, sections of elevated embankment, and the preponderance of steel rails and wood ties are sufficient to convey the resource's historic function and aesthetic.

Source: http://historicalmaps.arcgis.com/usgs.

⁷ Maniery, 7.



Image 11: Walnut Grove Branch Line Railroad, view looking northeast at the Sutterville Road crossing.





Image 13: Walnut Grove Branch Line Railroad, view looking southwest at the 43rd Avenue crossing.

Source: GPA Consulting, 2017.



Image 12: Walnut Grove Branch Line Railroad, view looking northwest at the 35th Avenue crossing.

Source: GPA Consulting, 2017.



Image 14: Detail view of what appear to be wood overcrossing remnants at the 43rd Avenue crossing.

Source: GPA Consulting, 2017.

Setting

The integrity of setting for the subject segment has been diminished due to the ongoing development in the Sacramento area: the segment was originally surrounded by rural agricultural land, but today, the alignment runs through commercial areas and residential subdivisions. The resource does, however, retain a topographical relationship to its setting, including its placement in areas atop an elevated embankment, reflecting its historic function—an elevated embankment would help prevent shipping capabilities from being interrupted by flooding, which would be a legitimate and potentially frequent concern in an agricultural region adjacent to a river delta.

Materials

Some short sections of the track within the segment have been partially dismantled or altered. At road crossings, portions of track have been covered in asphalt. However, the majority of the segment retains steel rails, wood ties, and gravel ballast, as it would have during the period of significance. These were the standard materials for constructing a railroad in the early twentieth century, and the extant rails, ties, and ballast reflect the technology of the era as well as the materials that were plentiful and commonly used when the line was built. Overall, the integrity of materials remains intact.

Workmanship

The integrity of workmanship can be seen in details as minute as the individual bolts holding the rails together, or in features as pronounced as the elevated embankment that was dug using massive dredging equipment. The integrity of workmanship is supported by the integrity of materials and design and, like the materials and design, reflect construction technology of the era.

Feeling

The physical integrity of the resource helps it to convey a sense of time and place and evokes the feeling of an early twentieth century railroad segment.

Association

The feeling of association is intact, as the resource retains sufficient physical integrity to convey its associative significance under Criterion A and Criterion C.

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant environmental impacts to cultural and tribal resources. When an impact is determined to be significant, mitigation measures are identified that would reduce or avoid that impact, if feasible.

Methodology for Analysis

The following Thresholds of Significance are established by CEQA guidelines Section 15065, 15126, and Appendix A. According to these guidelines, a Project would have a significant environmental impact if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5;
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5;
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
- Disturb any human remains, including those interred outside of formal cemeteries;
- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact CUL-1: Potential to cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Build Alternative

According to 36 CFR 800.5(a)(1), an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the

NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Examples of adverse effects on historic properties include, but are not limited to:

- i. Physical destruction of or damage to all or part of the property;
- ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
- iii. Removal of property from its historic location;
- iv. Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- v. Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- vi. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- vii. Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.⁸

The Build Alternative includes the construction of a Class I multi-use trail along the abandoned railway corridor, and repurposing sections of the existing railroad track where feasible. According to example ii, above, to avoid adverse effect, all work must comply with the Secretary of the Interior's Standards. Because the Build Alternative includes adaptive reuse, the appropriate treatment for the historic property is Rehabilitation.

Project Details

The Build Alternative includes limited removal of existing railroad track only where necessary for safety, particularly at major arterial intersections or where the skew of the existing track against the alignment of the proposed multi-use trail will cause a safety hazard. Where it exists, the majority of the track will be retained, including its metal rails, wood ties, and gravel ballast. Some of these portions will be incorporated into the Project through the use of landscaping, such as drought-tolerant and native plantings, as well as park-like fixtures such as benches, and trash receptacles. Overgrown and excess vegetation will also be removed where necessary for safety. Other components of the Build Alternative include providing access points at various locations along the trail, as well as landscape and hardscape improvements.

Analysis of Adverse Effect

This section applies the Criteria of Adverse Effect as outlined in 36 CFR 800.5 to the proposed undertaking. The Build Alternative will not involve the removal of the property from its historic location or neglect of a property which causes its deterioration. The property is not under Federal ownership. While there is limited removal of fabric, introduction of visual elements, and a change in use proposed as part of the Project, each of these aspects of the Project fall within the scope of rehabilitation. As the Secretary of the Interior's Standards for the Treatment of Historic Properties apply to this type of Project, separate

⁸ 36 CFR 800.5(a)(2)(i through vii).

analysis under each criterion of adverse effect is not necessary. To avoid adverse effect, however, the work must comply with the Secretary of the Interior's Standards for Treatment of Historic Properties. Following is an analysis of the Build Alternative for compliance with the Rehabilitation Standards:

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

The property was historically used as a rail line until the route was inactivated and abandoned in the 1970s. Its most significant defining characteristics are its location, horizontal track alignment, and intermittent elevated embankment. The location and horizontal track alignment will not be altered by the Project. The elevated embankment will be retained at all but one location. At the intersection of 27th Avenue/Normandy Lane/Del Rio Road, the existing embankment and ramps do not meet current ADA requirements and must be lowered accordingly in order to meet the Project goals. The vast majority of the property's most significant characteristics will be retained as a part of this Project.

Other defining characteristics of the property include its steel rails, wood ties, and gravel ballast. Track removal is limited to 2 percent of the existing material and is only proposed where necessitated for safety reasons. In certain areas of the Project alignment, park-like features such as drought-tolerant native landscaping and benches will be introduced among the existing tracks and rails in a manner that does not disturb the historic fabric. Lighting will be added at roadway crossings only. If a material, such as ballast, must be removed in order to install a new element, such as irrigation or plantings, the material will be replaced in kind after the work is completed. Two sections of track that require removal for safety or ADA requirements are proposed to be salvaged and reused in adjacent areas where track is already missing, in order to reduce net loss of track resulting from the Project. Other sections of track at certain major intersections will be encased in concrete—leaving the steel rails visible—to increase safety. The tracks have already been altered at these major intersections.

Less significant defining characteristics of the property include its agricultural setting, which has been diminished by continuous development outside the period of significance. The resource's integrity of setting is now primarily represented by the resource's topographical relationship to its site; this will be retained as part of the undertaking, apart from the intersection of 27th Avenue/Normandy Lane/Del Rio Road, as discussed above. The majority of new construction proposed as part of the Project will take place adjacent to the historic structure. The new construction is linear and will be constructed at or below the same height as the historic structure, using asphalt and concrete. These materials already exist in the vicinity of the resource.

The Build Alternative will meet the Project goals while requiring only minimal changes to the property and its environment. Therefore, the undertaking complies with Standard 1.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

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. Two sections of track that require removal for safety or ADA requirements are proposed to be salvaged and reused in adjacent areas where track is already missing, in order to reduce net loss of track resulting from the Project. Other sections of track at certain major intersections will be encased in concrete—leaving the steel rails visible—to increase safety. In certain areas of the Project alignment, park-like features such as drought-tolerant native landscaping and benches will be introduced among the existing tracks and rails in a manner that does not disturb the historic fabric. Lighting will be added at roadway crossings only. If a material, such as ballast, must be removed in order to install a new element, such as irrigation or plantings, the material will be replaced in kind after the work is completed.

Overall, track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessitated for safety reasons and will otherwise be avoided. Therefore, the undertaking complies with Standard 2.

Track removal is limited to the following areas:

- North of Z'Berg park, where the skew of the existing track against the proposed bike path creates a safety hazard
- Roadway approaches, where the skew of the existing track against the proposed bike path creates a safety hazard
- At the intersection of Sutterville Road, to increase safety at the crossing. In addition to increasing safety, track removal at this location will facilitate other Project goals and safety features, including reducing the intersection length and improving the visibility of new signals.
- A wooden trestle bridge that was partially burned in an accidental fire and is now unsafe.

Track will be retained in place and encased in concrete at the following locations:

- South Land Park Drive
- Del Rio Road
- 35th Avenue
- 43rd Avenue

Track will be salvaged and reused in adjacent areas to the following locations:

- The vicinity of the 27th Avenue/Normandy Lane/Del Rio Road intersection
- Across the waterway south of Charlie Jensen Park
- 3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

There is no proposed addition of conjectural features. There are two sections of track that are proposed for removal for safety reasons that are also proposed for salvage and reuse. The material removed from these sections is proposed to be salvaged and reused in adjacent areas where track has already been removed. This is not conjecture, however, as the track materials in adjacent areas would have been identical prior to their removal. Therefore, the undertaking complies with Standard 3.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Alterations to the property have taken place outside the period of significance and have not acquired historic significance in their own right. As such, Standard 4 does not apply to the undertaking. Regardless, the majority of the resource will be retained in place, apart from the approximately 2 percent of track removal where necessitated for safety or accessibility reasons. 5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

As a standard gauge railroad constructed using common materials, the resource does not have any distinctive features or finishes. The resource primarily derives its significance from its location and alignment. It is, however, a distinctive example of the construction technique in which massive dredging equipment was used to create an elevated embankment. This elevated embankment, where it exists, will be retained in place with the exception of one area: At the intersection of 27th Avenue/Normandy Lane/Del Rio Road, the existing embankment and ramps do not meet current ADA requirements and must be lowered accordingly. This small portion is the only area where the grade will be substantially altered; the character-defining feature will still exist in the remainder of the segment and will be sufficient to convey the property's significance. Therefore, the undertaking complies with Standard 5.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

The Build Alternative does not involve the repair or replacement of any historic features. Therefore, Standard 6 does not apply.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

There are no proposed chemical or physical treatments. Therefore, Standard 7 does not apply.

8. Significant archeological resources affected by a Project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

If archaeological resources are found during the construction of the Project, work will be halted and the resources will be handled according to the procedures set forth in the Caltrans Section 106 PA and Caltrans Standard Environmental Reference.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

The majority of new construction proposed as part of the undertaking will take place adjacent to the historic structure. The new construction is linear and will be located along the historic alignment of the Walnut Grove Branch Line. It will be constructed at or below the same height as the historic structure, using asphalt and concrete. These materials already exist in the vicinity of the resource.

Certain areas of the Project require encasing track in concrete or the full removal of track in order to address safety hazards or ADA requirements. However, this work is generally limited to roadway intersections where the resource has typically already been altered and will not further diminish the existing level of integrity.

In certain areas of the Project alignment, park-like features such as drought-tolerant native landscaping and benches will be introduced among the existing tracks and rails in a manner that does not disturb the historic fabric. Lighting will be added at roadway

crossings only. If a material, such as ballast, must be removed in order to install a new element, such as irrigation or plantings, the material will be replaced in kind after the work is completed.

Overall, the undertaking is compatible with the historic resource in its size, scale, and new use. The majority of the work is additive rather than subtractive, and new features of the Project will be differentiated from the historic resource through the use of distinguishable materials that already exist in the immediate surroundings, including concrete and asphalt. The conversion of portions of track into a walking path using DG, or a similar material, is a reversible, non-permanent change that will not damage the integrity of the existing historic fabric. Therefore, the undertaking complies with Standard 9.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The majority of new construction proposed as part of the undertaking will take place adjacent to the historic structure. The most significant distinguishing characteristics of the property are its location and horizontal linear alignment, which constitute its essential form. If the elements of the Project were removed, the essential form of the Walnut Grove Branch Line segment would remain. The resource's integrity of setting has already been diminished by continuous development outside the period of significance. Its integrity of setting is now primarily represented by the resource's topographical relationship to its site; this will be retained as part of the undertaking, apart from the intersection of 27th Avenue/Normandy Lane/Del Rio Road. At this location, the existing embankment and ramps do not meet current ADA requirements and must be lowered accordingly in order to meet the Project goals. All other topographical grade changes will be retained. Therefore, the undertaking complies with Standard 10.

Conditions Proposed

The plans for the undertaking were in the early design stages when the Finding of Effect was prepared. To ensure that it continues to comply with the Rehabilitation Standards as design and construction progress, an Action Plan (Action Plan) was developed. It identifies the specific tasks during each stage of the undertaking that will be required to ensure the work complies with the Rehabilitation Standards, as well as the responsible parties for ensuring that each task is completed. Table 10 provides a summary of the Action Plan.

Stage	Responsible Parties	Task	Date Completed ⁹
Jlage	Responsible Faitles		Date Completed
Plan Development/ Construction Documents	Caltrans Architectural Historian (CAH) ¹⁰ City Staff (CS) Project Manager (PM) Project Engineer (PE)	PM, PE, and CS will provide to CAH for review:	
		 Project plans for trail at 60 percent and 90 percent completion 	
		 Project plans for concrete bridge at 60 percent and 90 percent completion. 	
		 Salvage and reuse plan for portions of existing track. 	
		 Landscape plan at 60 percent and 90 percent completion. 	
		 CAH will review the plans for compliance with the Rehabilitation Standards and work with the PM, PE, and CS to resolve any outstanding issues. 	
		 CAH will provide formal approval in the form of a memo. 	

Table 10. Summary of Action Plan

 ⁹ This column will be completed when each task is complete.
 ¹⁰ Caltrans may elect to have a qualified consultant conduct some its monitoring responsibilities. In this case, Caltrans PQS would review and approve the consultant's work.

Stage	Responsible Parties	Task	Date Completed ⁹
Pre-Construction/ Construction	CAH CS PM PE	All responsible parties will create an on-site monitoring schedule in accordance with the construction schedule prior to the start of construction.	
		• The on-site monitoring schedule will include inspection and approval of the following milestones, at minimum:	
		 ○ A 25-foot long mock- up segment of the Class I Multi-Use Trail 	
		 A 25-foot long mock- up segment of the converted railroad track with DG (or similar material) 	
		 One instance of encasing tracks in concrete at a roadway intersection 	
		 One instance of salvaged materials installed in new adjacent location 	
		 Test plantings along sections of track not proposed for conversion to walking trail 	
		 The monitors will be available on call if additional issues related to historic fabric and setting not listed here arise 	
		during construction.	

Table 10. Summary of Action Plan

Stage	Responsible Parties	Task	Date Completed ⁹
During construction	CAH CS PM PE	CS, PM, and PE will notify CAH in advance when events requiring monitoring will occur.	
		 CAH will be present to monitor required construction events and will prepare monitoring reports summarizing activities and results. 	
Post-construction	CAH CS PM PE	 CS, PM, and PE will notify CAH when construction is complete. CAH will investigate the 	
		 CAH will investigate the finished alignment at regular intervals to ensure that all work was completed according to the plans and that it complies with the Rehabilitation Standards. 	
		 All responsible parties will work together to resolve outstanding issues. 	
		 CAH will provide formal approval in the form of a memo. 	

Table 10. Summary of Action Plan

Caltrans Cultural Services Office (CSO) Consultation

Caltrans applied the Criteria of Adverse Effect to the historic property within the PAL and considered any views concerning such effects which have been provided by consulting parties and the public, as per CFR 800.5(a). The proposed undertaking complies with the Secretary of the Interior's Standards for Rehabilitation. Therefore, Caltrans proposed that a Finding of No Adverse Effect with Standard Conditions through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties would be appropriate. Consultation with the CSO was initiated on October 12, 2018 pursuant to 36 CFR 800.5(c) and Section 106 PA Stipulation X.B(1). On October 23, 2018, the CSO did not object to Caltrans' Finding of No Adverse Effect with Standard Conditions through the use of the Secretary of the Interior's Standards for the Treatment of Historic to Caltrans' Finding of No Adverse Effect with Standard Conditions through the use of the Secretary of the Interior's Standards for the Treatment of Historic to Caltrans' Finding of No Adverse Effect with Standard Conditions through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties. See Appendix H for the CSO concurrence letter.

Level of Significance: Less than Significant With Mitigation Incorporated.

Required Mitigation: CR-1.

No Project Alternative

The multi-use trail would not be constructed; therefore, no direct impacts to the historic rail would occur.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact CUL-2: Potential to cause a substantial adverse change in the significance of an Archaeological resource pursuant to §15064.5.

Build Alternative

In an effort to identify archaeological resources that might be affected by the undertaking, a pedestrian survey, background research, and consultation with individuals and organizations were conducted. A record search conducted at the NCIC identified five prehistoric cultural resources (including one that was mismapped) and five historic-era cultural resources within a one-quarter mile radius of the PAL, as well as two historic-era resources adjacent to the PAL, and one historic-era resource within the PAL. The historic-era resource within the PAL includes the Nationally-Registered Walnut Grove Branch of the Southern Pacific Railroad. The pedestrian survey did not observe any cultural resources within the PAL.

A review of the historic land use indicated that the majority of the Project area has been extensively modified as a result of agriculture followed by the construction of the railroad, and eventually the buildup of housing and commercial development. Such large-scale ground disturbances leave little potential for the presence of buried prehistoric or historic era cultural resources.

Although Native American Monitors noted several possible isolated artifacts within the Project corridor, these isolated artifacts are exempt from evaluation under the existing Programmatic Agreement. Additionally, during AB52 consultation, the United Auburn Indian Community determined that these possible isolated artifacts were not connected to Tribal Cultural Resources and had the United Auburn Indian Community had no concerns with the Project. No other indications of prehistoric habitation were observed.

At this time, no further archaeological study is recommended unless Project plans change to include areas not previously included in the PAL or if additional information is received from other sources or special interest groups. With the findings of the visual survey, record search, and Native American consultation, no impacts are anticipated for the Project related to archaeological resources. With any Project requiring ground disturbance, there is always the possibility that unknown cultural resources may be unearthed during construction. With the implementation of Mitigation Measure CR-2 through CR-7, potential impacts from the Project would be less than significant with mitigation incorporated.

Level of Significance: Less than Significant with Mitigation

Required Mitigation: CR-2 through CR-7.

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur and no potential impacts to archaeological resources would occur.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact CUL-3: Potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Build Alternative

No findings of unique paleontological resources, sites or unique geological features were identified during the record search and pedestrian survey within the Project area; therefore, no impacts are anticipated for the Project related to paleontological resources.

Level of Significance: No Impact.

Required Mitigation: None Required.

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur and no impacts are anticipated to paleontological resources.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact CUL-4: Potential to disturb human remains, including those interred outside of formal cemeteries.

Build Alternative

With any Project requiring ground disturbance, there is always the possibility that unmarked burials may be unearthed during construction. This impact is considered potentially significant. Implementation of Mitigation Measure **CR-6** would reduce this impact to a less-than significant level.

Level of Significance: Less than Significant with Mitigation

Required Mitigation: CR-6.

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur and no potential impacts to disturb human remains would occur.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact CUL-5: Potential to cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or 2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Build Alternative

The Build Alternative is not anticipated to cause a substantial adverse change in the significance of a Tribal Cultural Resource (TRC) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k). The Project is not anticipated to cause a substantial adverse change to a Tribal Cultural Resource (TRC) pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 5024.1. No cultural resources were identified during the visual survey, record search, and Native American consultation. No impacts are anticipated for the Project related to archaeological resource; however, with any Project requiring ground disturbance, there is always the possibility that unmarked cultural resources may be unearthed during construction. This impact would be considered potentially significant.

Implementation of Mitigation Measure CR-2 through CR-7 would reduce this impact to a less-than significant level.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: CR-2 through CR-7.

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur and there would be no potential impacts to tribal cultural resources.

Level of Significance: No Impact.

Required Mitigation: None Required.

Mitigation Measures

CR-1: The City shall implement the Caltrans approved Action Plan during each stage of the undertaking that will be required to ensure the work complies with the Rehabilitation Standards, as well as the responsible parties for ensuring that each task is completed.

CR-2: Additional archaeological survey would be needed if Project limits are extended beyond the present survey limits.

CR-3: The United Auburn Indian Community of Auburn Rancheria and the Ione Band of Miwok Indians shall be notified 7 days in advance of each phase of ground disturbance as part of the Project.

CR-4: A cultural resources awareness training program will be developed which will include relevant information regarding cultural resources; respectful treatment of cultural resources; applicable regulations; consequences of violating regulations; applicable avoidance and minimization measures; and the protocols and notification chain of command/points of contact should a cultural resource be discovered. The program will also underscore the requirement for confidentiality and culturally-appropriate treatment of any cultural. Cultural resource awareness training will be provided to all construction crew working on-site throughout the duration of the Project.

CR-5: If previously unidentified archaeological materials are unearthed during construction, all work shall be halted within 100 feet of the discovery until a qualified archaeologist can assess the significance of the find. Should the archaeological resource be Native American in origin, the United Auburn Indian Community of Auburn Rancheria, the Ione Band of Miwok Indians, the Buena Vista Rancheria, and the T'si-Akim Maidu shall be contacted and consulted on the discovery. Work shall not resume until the archaeologist, Caltrans District 3, the City, and if the resource is Native American in origin, the United Auburn Indian Community of Auburn Rancheria, the Ione Band of Miwok Indians, the Buena Vista Rancheria, and the T'si-Akim Maidu have determined the significance of the resource and appropriate mitigation, if necessary.

CR-6: Section 5097.94 of the Public Resources Code and Section 7050.5 of the California Health and Safety Code protect Native American burials, skeletal remains and grave goods, regardless of age and provide method and means for the appropriate handling of such remains. If human remains are encountered, work should halt in that vicinity and the county coroner should be notified immediately. At the same time, an archaeologist should be contacted to evaluate the situation. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of such identification. CEQA and 43 CFR 10.3 details steps to be taken if human burials are of Native American origin.

CR-7: If previously unidentified Native American cultural resources are unearthed during construction, all work shall be halted within 100 feet of the discovery and the United Auburn Indian Community of Auburn Rancheria (UAIC), shall be contacted and consulted on the discovery to assist the City and the City designated archaeologist on determining the significance of the discovery. Should the resource be determined a TCR, then the UAIC shall provide recommendations for further evaluation and/or treatment, as necessary, within 48 hours. The City will document these recommendations in their records. After review and consultation, the City will determine the most appropriate and respectful action and will document justification for the final action in their files.

2.5 GEOLOGY AND SOILS

This section describes applicable regulations pertaining to geology and soil resources and evaluates the Build Alternative's potential impacts to the established baseline environmental setting using established thresholds of significance. Paleontological resources as they relate to geological features are addressed in Section 3.4, "Cultural Resources and Tribal Cultural Resources."

Regulatory Framework

Federal

Uniform Building Code Chapter 18, Division 1 Section 1803.2 and 1804.5

Uniform Building Code Chapter 18, Division 1 Section 1803.2 and 1804.5 The Uniform Building Code (UBC) 1994, Chapter 18. Division 1 Section 1803.2 mandates that special foundation design consideration be employed if the soil Expansion Index is 20, or greater in accordance with Table 18-1-B below. The methodology and scope for a geotechnical investigation are described in UBC Section 1803, and requires an assessment of a variety of factors, such as slope stability, soil strength, adequacy of load-bearing soils, the presence of compressible or expansive soils, and the potential for liquefaction. The required content of the geotechnical report includes recommendations for foundation type and design criteria. These recommendations can include foundation design provisions that are intended to mitigate the effects of expansive soils, liquefaction, and differential settlement. In general, mitigation can be accomplished through a combination of ground modification techniques (i.e., stone columns, reinforcing nail and anchors, deep soil mixing, etc.), selection of an appropriate foundation type and configuration, and use of appropriate building/foundation structural systems. Section 1804.5 Excavation, Grading, and Fill require the preparation of a geotechnical report where a building will be constructed on compacted fill. (UBC 1994)

TABLE 18-I-B-CLASSIFICATION OF EXPANSIVE SOIL

EXPANSION INDEX	POTENTIAL EXPANSION	
0-20	Very low	
21-50	Low	
51-90	Medium	
91-130	High	
Above 130	Very high	

The International Building Code (IBC) replaced earlier regional building codes (including the Uniform Building Code) in 2000 and established consistent construction guidelines for the nation. In 2006, the IBC was incorporated into the 2007 California Building Code (CBC) (see State regulations below in Section 3.5.1.2), and currently applies to all structures being constructed in California. The national model codes are therefore incorporated by reference into the building codes of local municipalities. The CBC includes building design and construction criteria that take into consideration the State's seismic conditions.

Clean Water Act

The Clean Water Act (CWA, 33 USC 1344) focuses primarily on waters of the United States, and is more thoroughly described in Section 3.3 (Biological Resources). However, the CWA focuses on sediment control in two aspects. First, the United States Army Corp of Engineers (USACE) administers Section 404, which regulates the discharge of fill into waters of the United States. Secondly, the State Water Resources Control Board (SWRCB) administers Section 401 which applies to stormwater discharges, where erosion control is an integral part of achieving permit compliance.

Earthquake Hazards Reduction Act of 1977

The Earthquake Hazards Reduction Act of 1977 established the National Earthquake Hazards Reduction Program (NEHRP) "to reduce the risks of life and property from future earthquakes in the

United States through the establishment and maintenance of an effective earthquake hazards reduction program." The four principal goals of the NEHRP are:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation;
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems;
- Improve earthquake hazards identification and risk assessment methods, and their use; and
- Improve the understanding of earthquakes and their effects.

Many of the tools used to assess, as well as mitigate, earthquake hazards and impacts were developed under the NEHRP.

State

Alquist-Priolo Fault Zoning Act

The Alquist-Priolo Fault Zoning Act (AP Act), administered by the California Geological Survey (CGS), provides a mechanism for reducing losses from surface fault ruptures on a statewide basis. The AP Act requires the mapping of zones around active faults in California, in an effort to prohibit the construction of structures for human occupancy on active faults and minimize damage due to rupture of a fault. Active faults are those that have ruptured within the past 11,000 years. Where the AP Act identifies an Earthquake Fault Zone, a geologic investigation and report is necessary to prevent siting of buildings on active fault traces.

Seismic Hazard Mapping Act

The Seismic Hazard Mapping Act governs the responsibilities of city, county, and state agencies in identifying and mapping seismic hazard zones and mitigation seismic hazards to protect public health and safety in accordance with the provision of the California Public Resources Code, Division 2. Geology, Mines and Mining, Seismic Hazards Mapping – Chapter 7.8. The publication delineates zones where earthquakes could cause hazardous ground shaking and ground failure, including liquefaction and landslides. Currently, zones near the San Andreas Fault in the urban centers of the Greater San Francisco Bay Area and Los Angeles have been delineated. Local cities and counties within these zones regulate construction in order to minimize loss associated with these seismic hazards.

California Standard Building Code

Title 24, Part 2 of the California Building Standards Code of the California Code of Regulations contains specific requirements for construction with respect to earthquakes and seismic hazards intended to be protective of public health. Chapter 16 Section 1613 Earthquake Loads of the 2016 California Building Code (effective January 1, 2017) deals with Structural Design and requires that every structure, and portion thereof, including nonstructural components that are permanently attached to structures and their supports and attachments, shall be designed and constructed to resist the effects of earthquake motions. (California 2016).

Local

City of Sacramento 2035 General Plan (City of Sacramento 2015a)

Goal EC 1.1 Hazards Risk Reduction. Protect lives and property from seismic and geologic hazards and adverse soil conditions.

Policy EC 1.1.1 Review Standards. The City shall regularly review and enforce all seismic and geologic safety standards and require the use of best Management Practices (BMPs) in site design and building construction methods.

Policy EC 1.1.2 Geotechnical Investigations. The City shall require geotechnical investigations to determine the potential for ground rupture, earth shaking, and liquefaction due to seismic events, as well as expansive soils and subsidence problems on sites where these hazards are potentially present.

Policy ER 1.1.7 Construction Site Impacts. The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinances.

City of Sacramento Multi-Hazard Emergency Plan

The Multi-Hazard Emergency Plan addresses the City of Sacramento's planned response to extraordinary emergency situations associated with natural disasters, including flood events, seismic events, technological incidents, and nuclear defense operations. It provides operational concepts related to various emergency situations, identifies components of the local emergency management organization, and describes the City's overall responsibilities for protecting life and property during an emergency. The Emergency Plan also identifies possible sources of outside support (through mutual aid and specific statutory authorities) from other jurisdictions, and the private sector.

Sacramento County Multi-Hazard Mitigation Plan

The Sacramento County Multi-Hazard Mitigation Plan aims to reduce or eliminate long term risk to people or property from natural disasters, including flood and seismic events.

Sacramento City Code

Chapter 15.88 Grading and Erosion and Sediment Control

The City's grading ordinance is enacted for the purpose of regulating grading on property within the City to safeguard life, limb, health, property and the public welfare; to avoid pollution of watercourses with nutrients, sediments, or other materials generated or caused by surface water runoff from construction sites; to comply with the City's National Pollutant Discharge Elimination System (NPDES) Permit issued by the Regional Water Quality Control Board (RWQCB); and to ensure that the graded site within the City limits complies with all applicable City ordinances and regulations. The grading ordinance is intended to control all aspects of grading operations within the City.

Chapter 17.720 Surface Mining and Reclamation

This chapter provides effective and comprehensive surface mining and reclamation policies and regulations to properly carry out the requirements of Surface Mining and Reclamation Act (SMARA), and other applicable regulations to ensure that: adverse environmental and other effects of surface mining operations will be prevented or minimized and that the reclamation of mined lands will provide for the beneficial, sustainable, long-term productive use of the mined and reclaimed lands; and the production and conservation of minerals will be encouraged, while eliminating hazards to public health and safety and avoiding or minimizing adverse effects on the environment.

Department of Utilities

The City of Sacramento Department of Utilities (DOU) maintains policies and guidelines regarding grading, erosion control, stormwater drainage design, inspection, and permitting with responsibility for Grading Permits and Construction Permits.

Building Permit - Site-Specific Geotechnical Investigation

A site-specific geotechnical investigation is required prior to construction. The geotechnical evaluation must provide grading and design recommendations to address slope, channel-wall, and foundation instability; groundwater level and need for dewatering; erosion control; expansive soils; and differential settlement. The investigation must evaluate the soil types, test for shrink-swell potential, and determine preliminary load-bearing and strength characteristics. The geotechnical evaluation must be provided to the City as part of the City's building permit process. The City must review the geotechnical report along with Project design to confirm that the recommendations in the geotechnical report are reflected in Project design.

Environmental Setting

Regional Geology

The Build Alternative site is located within the geomorphic province of the Great Valley of California, which is characterized by a flat alluvial plain that is approximately 50 miles wide and 400 miles long. This region is within the Sacramento Valley which is drained by the Sacramento River and the San Joaquin Valley which is drained by the San Joaquin River. The mountain regions surrounding the Great Valley include the Sierra Nevada to the East, Tehachapi Mountains to the South, the Coastal Range to the West, and Cascade Range to the North. The region is considered to be relatively flat with gradual slopes ranging from sea level to 75 feet amsl (Sacramento 2009).

Local Geology

Project Site Soils

Prior to construction a site-specific geotechnical report would be prepared for the Project area to discuss the basic soil condition of the area in order to identify the specific soil properties of the Project corridor. The results of the Natural Resource Conservation Service (NRCS) Web Soil Survey were therefore used to identify the broader Project area soils that have the potential to occur in the region.

Based on the United States Department of Agriculture's (USDA) NRCS Web Soil Survey for Sacramento, the Project site is composed of a variety of Holocene-age imported fill materials consisting mostly of welldrained coarse-loamy soils that have a low to moderate expansion potential. The Riverbank Formation is present at depths of 60-70 feet or more below the ground surface (Fugro William Lettis & Associates, Inc. 2015).

Ground Failure, Liquefaction, and Landslides

Soil liquefaction occurs when ground shaking from an earthquake causes a sediment layer saturated with groundwater to lose strength and take on the characteristics of a fluid, thus becoming similar to quicksand. Factors determining the liquefaction potential are soil type, the level and duration of seismic ground motions, the type and consistency of soils, and the depth to groundwater. Loose sands and peat deposits, along with recent Holocene age deposits, are more susceptible to liquefaction, while older deposits of clayey silts, silty clays, and clays deposited in freshwater environments are generally stable under the influence of seismic ground shaking. The Project site consists of well drained, coarse-loamy soils that have a low potential for liquefaction or ground failure to occur. However, the relatively shallow groundwater table and ground shaking that could occur from the surrounding earthquakes could increase the liquefaction potential in the Project area. Key design standards would be implemented in order to reduce the liquefaction potential and ensure structure stability.

Landslides occur most frequently during or following large storms or earthquakes. Landslides are most likely to take place in areas where they have previously occurred. According to the CGS Landslide Map, there are no potential areas for landslides or liquefaction within the proposed Project area (CGS 2015).

Seismic Activity

No seismic hazard zones have been recorded in the proposed Project area under the Seismic Hazard Mapping Act. Additionally, there are no known faults that occur within or adjacent to the City of Sacramento. The nearest fault is the Bear Mountains Fault, located approximately 26 miles east of the Project area, and the nearest active fault is the Green Valley Fault located approximately 42 miles south west.

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to geology and soils. When an impact is determined to be potentially significant, mitigation measures have been identified that would reduce or avoid that impact.

Methodology for Analysis

Using the City of Sacramento 2035 General plan, the NRCS Web Soil Survey, CGS regulatory maps, and the CEQA Checklist for guidance, the following thresholds of significance for evaluating potential impacts were established. These thresholds are evaluated in Section 3.5.3.2 based on data reviewed from these sources to determine whether potential geology and soils impacts from the Build Alternative baseline setting (Sections 3.5.1 and 3.5.2) would be significant.

A potential impact would be significant if the Build Alternative would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state geologist for the area or based on other substantial evidence of a known fault or strong seismic ground shaking;
 - Seismic-related ground failure, including liquefaction; or,
 - o Landslides.
- Result in substantial soil erosion or the loss of topsoil;
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;
- Be located on expansive soil, as (previously) defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property; or,
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact GEO-1: Potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

- Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state geologist for the area or based on other substantial evidence of a known fault as defined by the Division of Mines and Geology Special Publication 42;
- Strong seismic ground shaking;
- Seismic-related ground failure, including liquefaction; or,
- Landslides.

Build Alternative

The Project area is located approximately 42 miles northeast of the nearest active fault and is not within an Alquist-Priolo Earthquake Fault Zone. Therefore, the change of fault rupture within the Project area is very low. Since previously identified fault lines are not within or near the Project site, the potential of fault rupture is negligible within the Project site, but in the event of an earthquake on a nearby fault, the Project site could experience ground shaking.

General Plan Goal EC 1.1 and Policies 1.1.1 to 1.1.3 would ensure that lives and property within the Project area protected from seismic hazards. These policies include regular review and enforcement of seismic and geologic safety standards, and geotechnical investigations to determine potential for hazards such as ground rupture, ground shaking, and liquefaction due to seismic events, as well as expansive soils and subsidence problems on sites where these hazards may be present. This impact is within the

scope of the General Plan and was analyzed in the Master EIR. By complying with the General Plan policies and City Code, the Build Alternative would have a less-than-significant impact on exposing life and property to seismic hazards. While the northern portion of the Project adjacent to Darnell Way will encroach on the eastern slope of the levee, the trail will be designed in compliance with Department of Water Resources (DWR) urban levee design criteria and USACE engineering requirements to prevent potential levee failure. Impacts related to the possibility of landslides would be less than significant.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, the potential to expose people to substantial adverse effects due to seismic shaking, liquefaction, or landslides would remain the same as the existing conditions.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact GEO-2: Potential to result in substantial soil erosion or the loss of topsoil.

Build Alternative

Due to the relatively flat nature of the Project area, substantial soil loss from stormwater runoff is not anticipated; however, the Build Alternative would include the excavation and movement of large quantities of soil which could result in the loss of topsoil if not properly handled. Temporary stockpiles of soil have the potential to result in loss of top soil during construction when soils are exposed and being transported, however, all Projects in the City are required to comply with the City's Administrative and Technical Procedures Manual for Grading and Erosion and Sediment Control (City of Sacramento DOU 2013). These procedures include requirements for obtaining a grading permit and general design standards as well as BMPs for construction related grading and drainage activities. **BIO-5** would incorporate the principals outlined in these procedures in an Erosion Control Plan for the City and the Contractor to follow which would minimize the potential erosion and loss of topsoil from the Build Alternative construction activities. The Erosion Control Plan would include requirements from the NPDES Permit related to stormwater, erosion, and sediment control. Therefore, construction related erosion and loss of top soils would be considered less than significant.

Once constructed, all topsoil exposed as a part of the Build Alternative would be revegetated. As such, the potential for substantial erosion would be limited since the site would be revegetated. In addition, and site grading would be designed for adequate drainage which would reduce the potential for water flowing or ponding in unintended areas, thus limiting exposed soils that could be subject to erosion. Therefore, operational impacts from the Build Alternative related to erosion and loss of top soil would be considered less than significant.

Level of Significance: Less than Significant with Mitigation Incorporated

Mitigation Required: BIO-5

No Project Alternative

The multi-use trail would not be constructed; therefore, soil erosion and the loss of topsoil would remain the same as the existing conditions.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact GEO-3: Potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Build Alternative

As discussed above, the potential for ground shaking in the Project area is considered low and it is not expected that soil issues resulting from interaction with groundwater from the groundwater table or seismic related ground failure would occur. The Project area consists mostly of well-drained coarse-loamy soils that have a low to moderate expansion potential not known to be unstable. Therefore, landslides, lateral spreading, subsidence, liquefaction or collapse in the Project area during construction or the operation of the Build Alternative is not expected. Therefore, impacts would be considered less than significant.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, the potential to expose people to substantial adverse effects due to seismic shaking, liquefaction, or landslides would remain the same as the existing conditions.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact GEO-4: Potential to be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property.

Build Alternative

Expansive or collapsible soils are characterized by the ability to undergo significant volume change (shrink and swell) as a result of variation in soil moisture content. Expansive soils are commonly very fine-grained with a high to very high percentage of 2:1 clays (NRCS 1993). Soil moisture content can change due to many factors, including perched groundwater, landscape irrigation, rainfall, and utility leakage. Engineering standards govern expansion potential evaluations and the Expansion Index (UBC Table 18-I-B) is calculated pursuant to the UBC Test Standard 18-1 (ASTM D-4829) in the 1994 UBC. Section 1803.2 of the 1994 Uniform Building Code directs expansive soil tendency be graded by this method. The UBC mandates that "special [foundation] design consideration" be employed if the Expansion Index is 20, or greater (UBC Table 18-I-B).

The Build Alternative is not known to occur in an area with soils that have high clay content. The soils in the Project area consist mostly of well-drained coarse-loamy soils and have a low to moderate expansion potential. A site-specific geotechnical investigation and report to determine soil classification would be conducted during final design. This report would help determine if the site is located on an expansive soil type and the feasibility of constructing the Build Alternative. Therefore, the impact associated with expansive soils in conjuncture with the Build Alternative would be less than significant.

Level of Significance: Less than Significant

Mitigation Required: None

No Project Alternative

The multi-use trail would not be constructed; therefore, no structures would be placed on top of potentially expansive soils.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact GEO-5: Potential to have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater.

Build Alternative

The Build Alternative would construct a multi-use trail along the abandoned railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road. The Project does not consist of additional structures or facilities that would require the use of septic tanks or alternative waste water disposal systems. The Build Alternative is consistent with the General Plan roadway designations and zoning for the Project site and would not create a demand for new utility facilities during construction or operation. No impact would occur to developing septic tanks or alternative wastewater disposal systems.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no impact would occur to developing septic tanks or alternative wastewater disposal systems.

Level of Significance: No Impact.

Required Mitigation: None Required.

Mitigation Measures

See BIO-5 in Section 2.3.

2.6 GREENHOUSE GAS EMISSIONS

This section describes the environmental and regulatory setting for greenhouse gas (GHG) emissions. It also describes impacts on GHG emissions that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal

Over the past decade, a number of applicable federal requirements have been developed. The following are actions regarding the federal government, GHGs, and fuel efficiency.

Greenhouse Gas Endangerment. In Massachusetts v. Environmental Protection Agency (EPA) (Supreme Court Case 05-1120), decided on April 2, 2007, the Supreme Court found that four GHGs, including carbon dioxide (CO2), are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA) and that the Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the EPA Administrator signed two distinct findings regarding GHGs under section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and Projected concentrations of the six key well-mixed greenhouse gases—carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding**: The Administrator finds that the combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to the greenhouse gas pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles, as discussed in the section "Clean Vehicles" below. After a lengthy legal challenge, the U.S. Supreme Court declined to review an Appeals Court ruling that upheld the EPA Administrator findings (EPA 2009b).

Clean Vehicles. Congress first passed the Corporate Average Fuel Economy law in 1975 to increase the fuel economy of cars and light duty trucks. The law has become more stringent over time. On May 19, 2009, President Obama put in motion a new national policy to increase fuel economy for all new cars and trucks sold in the United States. On May 7, 2010, the EPA and the Department of Transportation's National Highway Safety Administration announced a joint final rule establishing a national program that would reduce GHG emissions and improve fuel economy for new cars and trucks sold in the United States. A petition for writ of certiorari to the United States Court of Appeals for the District of Columbia Circuit was denied by the Supreme Court on October 15, 2013.

The first phase of the national program applies to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. They require these vehicles to meet an estimated combined average emissions level of 250 grams of carbon dioxide per mile, equivalent to 35.5 miles per gallon if the automobile industry were to meet this carbon dioxide level solely through fuel economy improvements. Together, these standards would cut carbon dioxide emissions by an estimated 960 million metric tons and 1.8 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2012–2016). The EPA and the National Highway Safety Administration issued final rules on a second-phase joint rulemaking establishing national standards for light-duty vehicles for model years 2017 through 2025 in August 2012 (EPA 2012c). The new standards for model years 2017 through 2025 apply to passenger cars, light-duty trucks, and medium duty passenger vehicles. The final standards are Projected to result in an average industry fleetwide level of 163 grams per mile of CO2 in

model year 2025, which is equivalent to 54.5 miles per gallon (mpg) if achieved exclusively through fuel economy improvements.

The EPA and the U.S. Department of Transportation issued final rules for the first national standards to reduce GHG emissions and improve fuel efficiency of heavy-duty trucks and buses on September 15, 2011, effective November 14, 2011. For combination tractors, the agencies are proposing engine and vehicle standards that begin in the 2014 model year and achieve up to a 20 percent reduction in carbon dioxide emissions and fuel consumption by the 2018 model year. For heavy-duty pickup trucks and vans, the agencies are proposing separate gasoline and diesel truck standards, which phase in starting in the 2014 model year and achieve up to a 10 percent reduction for gasoline vehicles and a 15 percent reduction for diesel vehicles by 2018 model year (12 and 17 percent respectively if accounting for air conditioning leakage). Lastly, for vocational vehicles, the engine and vehicle standards would achieve up to a 10 percent reduction dioxide emissions from the 2014 to 2018 model years.

Mandatory Reporting of Greenhouse Gases. The Consolidated Appropriations Act of 2008, passed in December 2007, requires the establishment of mandatory GHG reporting requirements. On September 22, 2009, the EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule, which became effective January 1, 2010. The rule requires reporting of GHG emissions from large sources and suppliers in the United States, and is intended to collect accurate and timely emissions data to inform future policy decisions. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions are required to submit annual reports to the EPA.

New Source Review. The EPA issued a final rule on May 13, 2010 that establishes thresholds for GHGs that define when permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule "tailors" the requirements of these CAA permitting programs to limit which facilities would be required to obtain Prevention of Significant Deterioration and Title V permits. In the preamble to the revisions to the federal code of regulations, EPA states:

This rulemaking is necessary because without it the Prevention of Significant Deterioration and Title V requirements would apply, as of January 2, 2011, at the 100 or 250 tons per year levels provided small sources, overwhelming the resources of permitting authorities, and severely impairing the functioning of the programs. EPA is relieving these resource burdens by phasing in the applicability of these programs to greenhouse gas sources, starting with the largest greenhouse gas emitters. This rule establishes two initial steps of the phase-in. The rule also commits the agency to take certain actions on future steps addressing smaller sources, but excludes certain smaller sources from Prevention of Significant Deterioration and Title V permitting for greenhouse gas emissions until at least April 30, 2016.

The EPA estimates that facilities responsible for nearly 70 percent of the national GHG emissions from stationary sources would be subject to permitting requirements under this rule. This includes the nation's largest GHG emitters—power plants, refineries, and cement production facilities.

Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units. As required by a settlement agreement, the EPA proposed new performance standards for emissions of carbon dioxide for new affected fossil fuel-fired electric utility generating units on March 27, 2012. New sources greater than 25 megawatts would be required to meet an output-based standard of 1,000 pounds of carbon dioxide per megawatt-hour, based on the performance of widely used natural gas combined cycle technology.

Cap and Trade. Cap and trade refers to a policy tool where emissions are limited to a certain amount and can be traded, or provides flexibility on how the emitter can comply. Successful examples in the United States include the Acid Rain Program and the NOx Budget Trading Program in the northeast. There is no

federal cap and trade program currently; however, some states have joined to create initiatives to provide a mechanism for cap and trade.

State

Legislative Actions to Reduce GHGs

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation such as the landmark AB 32 California Global Warming Solutions Act of 2006 was specifically enacted to address GHG emissions. Other legislation such as Title 24 and Title 20 energy standards were originally adopted for other purposes such as energy and water conservation, but also provide GHG reductions. This section describes the major provisions of the legislation.

Assembly Bill 32. The California State Legislature enacted Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. "Greenhouse gases" as defined under AB 32 include carbon dioxide, methane, NOx, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Since AB 32 was enacted, a seventh chemical, nitrogen trifluoride, has also been added to the list of GHGs. The California Air Resources Board (CARB) is the state agency charged with monitoring and regulating sources of GHGs. AB 32 states the following:

"Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."

The CARB approved the 1990 GHG emissions level of 427 million metric tons of carbon dioxide equivalents (MMT CO2e) on December 6, 2007 (CARB 2008a). Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 MMT CO2e. The CARB approved the 1990 GHG emissions level of 427 million metric tons of carbon dioxide equivalents (MMT CO2e) on December 6, 2007 (CARB 2008a). Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 MMT CO2e. The CARB approved the 1990 GHG emissions level of 427 million metric tons of carbon dioxide equivalents (MMT CO2e) on December 6, 2007 (CARB 2008a). Therefore, emissions generated in California in 2020 are required to be equal to or less than 427 MMT CO2e. Emissions in 2020 in a "Business-as-Usual" (BAU) scenario , which do not account for reductions from AB 32 regulations (CARB 2008a). At that level, a 28 percent reduction was required to achieve the 427 MMT CO2e 1990 inventory. In October 2010, CARB prepared an updated 2020 forecast to account for the recession and slower forecasted growth. The forecasted inventory without the benefits of adopted regulation is now estimated at 545 MMT CO2e. Therefore, under the updated forecast, a 21.7 percent reduction from BAU is required to achieve 1990 levels (CARB 2010).

Progress in Achieving AB 32 Targets and Remaining Reductions Required

The State has made steady progress in implementing AB 32 and achieving targets included in Executive Order S-3-05. The CARB also prepared updated emission inventories for 2000 through 2011 to show progress achieved to date (CARB 2013). Executive Order S-3-05 includes a target for 2010 of reducing GHG emissions to 2000 levels. As shown below, the 2010 emission inventory achieved this target. Also shown are the average reductions needed from all statewide sources (including all existing sources) to reduce GHG emissions back to 1990 levels.

- 1990: 427 MMT CO2e (AB 32 2020 Target)
- 2000: 463 MMT CO2e (an average 8 percent reduction needed to achieve 1990 base)
- 2010: 450 MMT CO2e (an average 5 percent reduction needed to achieve 1990 base)
- 2020: 545 MMT CO2e BAU (an average 21.7 percent reduction from BAU needed to achieve 1990 base)

CARB Scoping Plan. The CARB's Climate Change Scoping Plan (Scoping Plan) contains measures designed to reduce the State's emissions to 1990 levels by the year 2020 to comply with AB 32 (CARB 2008b). The Scoping Plan identifies recommended measures for multiple GHG emission sectors and the associated emission reductions needed to achieve the year 2020 emissions target—each sector has a different emission reduction target. Most of the measures target the transportation and electricity sectors. As stated in the Scoping Plan, the key elements of the strategy for achieving the 2020 GHG target include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewables energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system;
- Establishing targets for transportation-related GHG emissions for regions throughout California and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing State laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State's long-term commitment to AB 32 implementation.

In addition, the Scoping Plan differentiates between "capped" and "uncapped" strategies. Capped strategies are subject to the proposed cap-and-trade program. The Scoping Plan states that the inclusion of these emissions within the cap-and trade program would help ensure that the year 2020 emission targets are met despite some degree of uncertainty in the emission reduction estimates for any individual measure. Implementation of the capped strategies is calculated to achieve a sufficient amount of reductions by 2020 to achieve the emission target contained in AB 32. Uncapped strategies that would not be subject to the cap-and-trade emissions caps and requirements are provided as a margin of safety by accounting for additional GHG emission reductions.

The CARB approved the First Update to the Scoping Plan (Update) on May 22, 2014. The Update identifies the next steps for California's climate change strategy. The Update shows how California continues on its path to meet the near-term 2020 GHG limit, but also sets a path toward long-term, deep GHG emission reductions. The report establishes a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050. The Update identifies progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities Climate for the next several years. The Update does not set new targets for the State, but describes a path that would achieve the long term 2050 goal of Executive Order S-05-03 for emissions to decline to 80 percent below 1990 levels by 2050 (CARB 2014).

The CARB has no legislative mandate to set a target beyond the 2020 target from AB 32 or to adopt additional regulations to achieve a post-2020 target. The Update estimates that reductions averaging 5.2 percent per year would be required after 2020 to achieve the 2050 goal. With no estimate of future reduction commitments from the State, identifying a feasible strategy including plans and measures to be adopted by local agencies is not currently possible.

Senate Bill 32

On September 8, 2016, Senate Bill 32 (SB 32) was signed by Governor Brown, this bill would require the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

Executive Orders Related to GHG Emissions

California's Executive Branch has taken several actions to reduce GHGs through the use of Executive Orders. Although not regulatory, they set the tone for the state and guide the actions of state agencies.

Executive Order S-13-08. Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the order, the 2009 California Climate Adaptation Strategy (California Natural Resources Agency 2009) was adopted, which is the first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States. Objectives include analyzing risks of climate change in California, identifying and exploring strategies to adapt to climate change, and specifying a direction for future research.

Executive Order S-3-05. Former California Governor Arnold Schwarzenegger announced on June 1, 2005, through Executive Order S 3-05, the following reduction targets for GHG emissions:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The 2050 reduction goal represents what some scientists believe is necessary to reach levels that would stabilize the climate. The 2020 goal was established to be a mid-term target. Because this is an executive order, the goals are not legally enforceable for local governments or the private sector.

Executive Order B-30-15s. Governor Jerry Brown signed Executive Order B-30-15s on April 29, 2015. The following are major provisions of the Executive Order:

- 1. A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050.
- 2. All state agencies with jurisdiction over sources of greenhouse gas emissions shall implement measures, pursuant to statutory authority, to achieve reductions of greenhouse gas emissions to meet the 2030 and 2050 greenhouse gas emissions reductions targets.
- 3. The California Air Resources Board shall update the Climate Change Scoping Plan to express the 2030 target in terms of MMT CO2e.

The executive order does not apply directly to cities, counties, and special use districts such as EID, but would lead to the preparation of a new CARB Scoping Plan and the development of regulations to achieve post-2020 reduction targets.

Executive Order S-01-07 - Low Carbon Fuel Standard. The Governor signed Executive Order S 01-07 on January 18, 2007. The order mandates that a statewide goal shall be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. In particular, the executive order established a Low Carbon Fuel Standard and directed the Secretary for Environmental Protection to coordinate the actions of the California Energy Commission, the CARB, the University of California, and other agencies to develop and propose protocols for measuring the "life-cycle carbon intensity" of transportation fuels. This analysis supporting development of the protocols was included in the State Implementation Plan for alternative fuels (State Alternative Fuels Plan adopted by California Energy Commission on December 24, 2007) and was submitted to CARB for consideration as an "early action" item under AB 32. The CARB adopted the Low Carbon Fuel Standard on April 23, 2009. The Low Carbon Fuel Standard was challenged in the United States District Court in Fresno in 2011. The court's ruling issued on December 29, 2011 included a preliminary injunction against CARB's implementation of the rule. The Ninth Circuit Court of Appeals reversed the decision of the District Court in September 2013 and denied a petition to rehear a challenge on January 22, 2014. The Renewable Fuels Association and Growth Energy filed a petition to the US Supreme Court on March 20, 2014 challenging the Court of Appeals decision. On June 30, 2014, the U.S. Supreme Court announced that it would not review the constitutionality of the California Low Carbon Fuel Standard (LCFS).

To address the Court ruling, CARB was required to bring a new LCFS regulation to the Board for consideration in February 2015. The proposed LCFS regulation was required to contain revisions to the

2010 LCFS as well as new provisions designed to foster investments in the production of the low-CI fuels, offer additional flexibility to regulated parties, update critical technical information, simplify and streamline program operations, and enhance enforcement. The public hearing for the new LCFS regulation was held on February 19, 2015. The Final Approval and Office of Administrative Law action was not yet posted as of April 29, 2015 (CARB 2015).

Local

Sacramento Area Council of Governments Sustainable Communities Strategy

In April 2012, Sacramento Area Council of Governments (SACOG), the designated Metropolitan Planning Organization (MPO) for the Sacramento region, adopted a Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) (SACOG 2012). Building on prior plans including the Blueprint Growth Strategy discussed below and the 2008 MTP, the SCS accommodates future growth through a more compact land use pattern largely within the region's current development footprint, emphasizes operational improvements over new roadway capacity Projects, and reflects other factors that have tended to reduce motor vehicle use. The SCS demonstrates that, if implemented, the region will achieve a 9 percent per capita GHG reduction in passenger vehicle emissions in 2020 and a 16 percent reduction in 2035. These reductions meet the targets for SACOG of 7 percent and 16 percent per capita GHG reduction from 2005 for the years 2020 and 2035, respectively, established by CARB. In June 2012, CARB issued an Acceptance of GHG Quantification Determination for the SACOG SCS, indicating that CARB concurs with SACOG's quantification of GHG emission reductions from the final MTP/SCS and its determination that the SCS would achieve the 2020 and 2035 targets established by CARB.

City of Sacramento 2035 General Plan

Policy ER 6.1.5 Community Greenhouse Gas Reductions. The City shall reduce community GHG emissions by 15 percent below 2005 baseline levels by 2020, and strive to reduce community emissions by 49 percent and 83 percent by 2035 and 2050, respectively.

ER 6.1.6 Municipal Greenhouse Gas Reductions. The City shall maintain and implement its Phase 1 Climate Action Plan to reduce municipal GHG emissions by 22 percent below 2005 baseline level by 2020, and strive to reduce municipal emissions by 49 percent and 83 percent by 2035 and 2050, respectively.

Policy ER 6.1.8 Additional GHG Emission Programs. The City shall continue to evaluate the feasibility and effectiveness of new policies, programs, and regulations that contribute to achieving the City's long-term GHG emissions reduction goals.

Policy ER 6.1.9 Climate Change Assessment and Monitoring. The City shall continue to assess and monitor performance of GHG emissions reduction efforts beyond 2020, progress toward meeting long-term GHG emission reduction goals, the effects of climate change, and the levels of risk in order to plan a community that can adapt to changing climate conditions and be resilient to negative changes and impacts.

City of Sacramento Climate Action Plan

In order to directly address the issue of climate change and GHG emissions, the City of Sacramento adopted its Climate Action Plan (CAP) on February 14, 2012. Then as part of the General Plan update process, the CAP was incorporated into the 2035 City of Sacramento General Plan. The City additionally, adopted in 2016, a CAP for Internal Operations for City facilities. The CAP describes GHG emissions from uses and activities within the City and establishes policies, actions, and implementation measures to reduce existing and future GHG emissions. As part of the CAP development process, a baseline GHG emissions inventory for the year 2005 was created that determined the City of Sacramento generated approximately 4.1 MMT CO2e in 2005. The CAP also established a GHG emissions reduction target of 15 percent below 2005 levels by the year 2020 and GHG reduction goals of 38 percent below 2005 levels by the year 2030 and 83 percent below 2005 levels by the year 2050. The CAP to streamline CEQA review for Projects that are determined to be consistent with the CAP, pursuant to Section 15183.5 of the State CEQA Guidelines.

Environmental Setting

GHG and climate change are a cumulative global issue. CARB and the United States Environmental Protection Agency (USEPA) regulate GHG emissions within the State of California and the United States, respectively. While the CARB has the primary regulatory responsibility within California for GHG emissions, local agencies can also adopt policies for GHG emission reduction.

Many chemical compounds found in the Earth's atmosphere act as GHGs, which allow sunlight to enter the atmosphere freely. When sunlight strikes the Earth's surface, some of it is reflected back towards space as infrared radiation (heat). GHGs absorb this infrared radiation and trap the heat in the atmosphere. Over time, the amount of energy sent from the sun to the Earth's surface should be about the same as the amount of energy radiated back into space, leaving the temperature of the Earth's surface roughly constant. Many gases exhibit these "greenhouse" properties. Some of them occur in nature (water vapor, carbon dioxide, methane, and nitrous oxide), while others are exclusively humanmade (like gases used for aerosols).

The principal climate change gases resulting from human activity that enter and accumulate in the atmosphere are listed below:

Carbon Dioxide (CO2): CO2 enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and chemical reactions (e.g., manufacture of cement). CO2 is also removed from the atmosphere (or "sequestered") when it is absorbed by plants as part of the biological carbon cycle.

Methane (CH4): CH4 is emitted during the production and transport of coal, natural gas, and oil. CH4 emissions also result from livestock and agricultural practices and the decay of organic waste in municipal solid waste landfills.

Nitrous Oxide (N2O): N2O is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.

Fluorinated Gases: Hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6) are synthetic, powerful climate-change gases that are emitted from a variety of industrial processes. Fluorinated gases are often used as substitutes for ozone-depleting substances (i.e., chlorofluorocarbons, hydrochloric fluorocarbons, and halons). These gases arc typically emitted in smaller quantities, but because they are potent climate-change gases, they are sometimes referred to as high Global Warming Potential (GWP) gases.

Global Warming Potential

Global Warming Potential (GWP) serves as the quantified measure of the relative effectiveness of a gas to absorb infrared radiation, remain in the atmosphere, and contribute towards global warming. CO2, the most abundant GHG, serves as the reference gas for the GWP, with a GWP of 1.16 The GWPs used by the Bay Area Air Quality Management District (BAAQMD) are shown in Table 11, where CH4 is 21 times more potent at contributing to global warming than CO2, while SF6 is 23,900 time more potent. Thus, CO2 is used as the reference GHG for all GHGs. GHG emissions, which consider all GHGs, can also be presented as CO2 equivalent (CO2e). The CO2e measure takes into consideration all of the GHGs, as measured by the applicable GWP.

Greenhouse Gas	Relative GWP (GWP of CO2=1)
CO2	1
CH4	21
NOx	310
HFCs and PFCs	9,090-11,700
SF6	23,900

1	Table 11. Global Warming	Ро	tential	for	Greenhouse Gases

Source: BAAQMD 2010

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts from GHG emissions. When an impact is determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

Methodology of Analysis

Using the Sacramento Metropolitan Air Quality Management District (SMAQMD) Guide to Air Quality screening thresholds for significance for CO2e (SMAQMD 2009), applicable air quality rules and regulations, and the CEQA Environmental Checklist for guidance, the following thresholds of significance for evaluating potential impacts were established. These thresholds are compared with project-specifc quantifications to determine whether potential air quality impacts from the Build Alternative would be significant. A potential impact would be significant if the Build Alternative would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment;
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.

To quantify the predicted GHG emissions from the Build Alternative, CO2 emissions from construction and operation of a Project were modeled using the Road Construction Emissions Model, Version 8.1.0.

To meet targets established by AB 32, California must reduce current GHG emissions and achieve 1990 emissions levels of 427 MMT CO2e by 2020. The 2020 BAU emissions baseline used in the 2008 Scoping Plan was 596 MMT CO2e. On September 8, 2016, SB 32 was approved by California State Governor Jerry Brown, this bill would require the CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2020.

Due to the global implications of climate change, it is difficult to determine the impacts of a relatively small contribution to GHG emission from an individual project. There is no simple metric that can determine if a project would impact cumulative GHG emission levels or conflict with the goals of AB 32. It is possible to estimate a project's localized GHG emissions, but it is difficult to determine how those emissions would translate into physical impacts to the environment. For this analysis, predicted Build Alternative GHG emissions were compared to AB 32 Scoping plan action measures and the SMAQMD Guidance GHG threshold for land use Projects of 1,100 metric tons CO2e/year (for construction GHG emissions).

The SMAQMD has established GHG emission thresholds for construction phase, operational phase, and stationary source Projects. SMAQMD emissions significance thresholds consider any construction phase of a Project emitting over 1,100 metric tons/year of CO2e would be considered significant (SMAQMD 2009a).

GHG emissions associated with the Build Alternative were estimated using CO2e emissions as a proxy for all GHG emissions. This is consistent with the current reporting protocol of the California Climate

Action Registry (CCAR). According to CalEEMod, all GHGs are reported in CO2e. In order to obtain the CO2e, an individual GHG is multiplied by its GWP. The GWP designates on a pound for pound basis the potency of the GHG compared to CO2. CalEEMod uses GWP from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (SAR). GWPs from the SAR were selected instead of more recent GWPs since it is the basis used in regulations and international protocols at this time (e.g., California and Federal GHG Reporting Programs, The Climate Registry).

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact GHG-1: Potential to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Build Alternative

Short-Term Construction Emissions

During construction of the Build Alternative, GHG emissions would be emitted from the operation of construction equipment and from worker supply vendor vehicles. Road Construction Emissions modeling was conducted to estimate the total CO2 emissions generated by the construction of the Project. The total CO2 emissions would be 8,988.16 pounds per day during the construction of the Project. The results of the modeling for CO2 are in Appendix E.

Long-Term Construction Emissions

Because the Build Alternative consists of constructing a recreational multi-use trail, and does not increase capacity of a roadway, there are no long-term operational activities associated with the Project. The Project would not lead to changes in vehicular operations and associated emissions. While there may be maintenance visits to the Project site, these visits are expected to be infrequent, and occur for emergency repair or for repaving, which occurs after the lifetime of the installed pavement has been reached. Additionally, the Project would provide a long-term benefit by providing additionally trail connectivity throughout the corridor that supports alternative modes of transportation which helps to reduce CO2 emissions. Long term operational emissions are thus expected to be negligible.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no additional greenhouse gas emissions would be generated.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact GHG-2: Potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Build Alternative

The Build Alternative must comply with the 2035 General Plan policies and measures for the reduction of GHGs to comply with the 2035 MTP and AB 32. Because the Build Alternative consists of installing a multi-use trail for recreational purposes, and is not traffic increasing, the Build Alternative would comply with the 2035 MTP. AB 32 requires an approximate 29 percent reduction from existing emissions on a

statewide level in order to achieve the goal of reducing GHG emissions to 1990 levels by 2030. In order for this to occur, the existing and future operations of the City, as well as individual land uses, must reduce their emissions accordingly. The Master EIR for the 2035 General Plan allows for periodic maintenance on recreational facilities, such as the proposed Del Rio Trail Project, therefore the GHG emissions increase that would occur with implementation of the Project has been accounted for in the General Plan. The Project would not impede the City's efforts to comply with AB 32 requirements. Therefore, the Projects cumulative impacts related to construction and operation of the Build Alternative conflicting with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions would be less than significant. The Project would not have any significant additional environmental effects relating to GHG emissions or climate change.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no additional greenhouse gas emissions would be generated.

Level of Significance: No Impact.

Required Mitigation: None Required.

Mitigation Measures

No mitigation required.

2.7 HAZARDS AND HAZARDOUS MATERIALS

This section describes the environmental and regulatory setting for hazards and hazardous materials. It also describes the existing conditions and potential impacts on hazards and hazardous materials that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal

Hazardous Material Management

Resources Conservation and Recovery Act

The Resources Conservation and Recovery Act (RCRA) set up the federal regulatory program for hazardous substances and gives the United States Environmental Protection Agency (USEPA) the authority to regulate the generation, transport, treatment, and disposal of hazardous substances in a "cradle to grave" system. Under the RCRA, USEPA regulates the generation, transportation, treatment, storage, and disposal of hazardous substances. This regulatory system includes tracking all generators of hazardous waste.

1984 Hazardous and Solid Waste Amendment Act

RCRA was amended by the 1984 Hazardous and Solid Waste Amendment Act, which prohibited the use of certain techniques for the disposal of certain hazardous wastes (USEPA 2016a). The Emergency Planning and Community Right-to-Know Act of 1986 imposes safety requirements to protect local communities in the event of accidental release of hazardous substances. The requirements provide measures so that the risks from interaction with hazardous materials, such as handling, storage, and disposal, are mitigated or prevented. This law protects human health and the environment if the unintended release of hazardous materials was to occur (USEPA 2016b). USEPA has delegated fulfillment of many of the RCRA's requirements to the California Department of Toxic Substances Control (DTSC).

Clean Air Act

Regulations under the Clean Air Act (CAA) (42 USC 7401 et seq. as amended) are designed to prevent accidental releases of hazardous materials. The regulations require facilities that store a threshold quantity or greater of listed regulated substances to develop a risk management plan, including hazard assessments and response programs to prevent accidental releases of listed chemicals.

Hazardous Materials Transportation

Hazardous Materials Transportation Act

The transport of hazardous materials is regulated by the United States Department of Transportation (Caltrans) under Hazardous Materials Transportation Act (HMTA). To accomplish this, the Federal Aviation Administration, Federal Motor Carrier Safety Administration, Federal Railway Administration, Pipeline and Hazardous Materials Safety Administration, and the U.S. Coast Guard have been given authority to enforce hazardous material transport regulations.

Worker Safety

Occupational Safety and Health Administration

The Occupational Safety and Health Act of 1970 created the Occupational Safety and Health Administration (OSHA), which is responsible for protecting the health of workers, such as during the handling of hazardous materials. OSHA has created regulation to set federal standards of workplace safety including exposure limits, mandatory workplace training, accident and injury reporting, and safety procedures. These regulations are recorded in the CFR Title 29 (GPO 2016).

State

Hazardous Material Management

Hazards Waste Control Act

The Hazardous Waste Control Act created the State hazardous waste management program. The act is implemented by regulations contained in Title 26 of the CCR, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling treatment, storage and disposal facilities; operation of facilities and staff training; and closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with the DTSC.

California Environmental Protection Agency

The California EPA (CAL EPA) is responsible for creating and enforcing environmental regulations within California. Within CAL EPA is the DTSC, which was formed under the Hazardous Waste Control Act. The DTSC is responsible for regulating hazardous waste, remediating existing contamination, and identifying ways to reduce production of hazardous wastes. DTSC can delegate enforcement responsibilities to local jurisdictions.

Unified Program

The unified hazardous waste and hazardous materials management regulatory program (Unified Program) is a unified hazardous materials management program that was established by California's Secretary for Environmental Protection following Senate Bill 1082 (1993). The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the following programs:

- Hazardous Materials Release Response Plans and Inventories
- California Accidental Release Prevention Program
- Underground Storage Tank Program
- Above Ground Petroleum Storage Act Program
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs
- California Uniform Fire Code: Hazardous Material Management Plans and Hazardous Material Inventory Statements

These six environmental programs are implemented at the local government level by Certified Unified Program Agencies (CUPAs). CUPAs provide a central permitting and regulatory agency for permits, reporting, and compliance enforcement. California Public Resources Code Section 21151.4 sets special requirements for environmental impact reports and negative declarations for Projects that involve the construction or alteration of a facility within one-fourth of a mile of school that creates the following conditions:

- Might reasonably be anticipated to emit hazardous air emissions;
- Would handle an extremely hazardous substance or a mixture containing extremely hazardous substances in a quantity equal to or greater than the state threshold quantity specified in Section 25532(j) of the Health and Safety Code; or
- May pose a health or safety hazard to persons who would attend or would be employed at the school.

As part of the CEQA process, the lead agency preparing the EIR must consult with the appropriate school district regarding the potential impact of the Project on the school and the school district must be notified

about the Project in writing at least 30 days before the proposed certification of the EIR or adoption of the mitigated negative declaration (Public Resources Code section 21151.4; 14 California Code of Regulations Section 15186(b)).

Cortese List Government Code Section 65962

Government Code Section 65962 was enacted in 1985 and was amended in 1992. It is used as a planning document to comply with the CEQA and requires information about locations of hazardous

materials release sites. It states that the through the combined efforts of the DTSC, the Department of Health Service, the State Water Resources Control Board (SWRCB) and local enforcement agencies a list of potential hazardous areas and sites will be compiled and remain up to date (at a minimum annually updated). The list is consolidated by the Secretary for Environmental Protection and is distributed to each city and county which sites on the list are located. The list can be found on the DTSC's data management system known as EnviroStor, which includes information from the SWRCB GeoTracker database.

Worker Safety

Division of Occupational Safety and Health

The Division of Occupational Safety and Health (DOSH), also known as CalOSHA, is responsible for enforcing workplace safety regulations and requirements in California, including hazardous materials requirements recorded under CCR Title 8 (DIR 2016). These regulations include requirements for safety training, availability of safety equipment, accident and illness prevention programs, warnings about hazardous substance exposure (such as asbestos), and preparation of emergency action and fire prevention plans.

The DOSH also enforces hazard-communication program regulations that contain training and information requirements. Such requirements include procedures for identifying and labeling hazardous substances, communicating information about hazardous substances and their handling, and preparing health and safety plans to protect workers and employees at hazardous waste sites. Under the hazard-communication program, employers must make Material Safety Data Sheets available to employees and document employee information and training programs.

Emergency Response

California Emergency Services Act

The California Emergency Services Act provides the basic authority for conducting emergency operations following a proclamation of emergency by the governor and/or appropriate local authorities. Local government and district emergency plans are considered to be extensions of the California Emergency Plan, established in accordance with the Emergency Services Act.

The California Emergency Management Agency (CAL EMA) is the state agency responsible for establishing emergency response and spill notification plans related to hazardous materials accidents. CAL EMA regulates businesses by requiring specific businesses to prepare an inventory of hazardous materials (CCR Title 19). CAL EMA is also the lead state agency for emergency management and is responsible for coordinating the state-level response to emergencies and disasters.

Fire Protection

California state fire safety regulations apply to State Responsibility Areas (SRAs) during the time of year designated as having hazardous fire conditions. California Department of Forestry and Fire Protection (CAL FIRE) has developed a fire hazard severity scale that considers vegetation, climate, and slope to evaluate the level of wildfire hazard in all SRAs. A SRA is defined as the part of the state where CAL FIRE is primarily responsible for providing basic wildland fire protection assistance. Areas under the jurisdiction of other fire protection services are considered to be Local Responsibility Areas or on Federal lands are considered Federal Responsibility Areas.

During the fire hazard season, these regulations include: (a) restrict the use of equipment that may produce a spark, flame, or fire; (b) require the use of spark arrestors on any equipment that has an

internal combustion engine; (c) specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and (d) specify fire suppression equipment that must be provided onsite for various types of work in fire-prone areas. CAL FIRE has primary responsibility for fire protection within SRAs.

Local

Sacramento County Environmental Management Department

The Sacramento County Environmental Management Department (SCEMD) is the CUPA for local implementation of the California Accidental Release Prevention (CAL ARP) and several other hazardous materials and hazardous waste programs. SCEMD is responsible for regulating hazardous materials business plans and chemical inventory, hazardous materials storage, hazardous materials management plans, and risk management plans. The hazardous materials business plan program requires businesses in Sacramento County to prepare business emergency response plans if hazardous materials storage equals or exceeds 55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of gas. The goal of SCEMD is to protect human health and the environment by ensuring that hazardous materials and hazardous waste are properly managed.

The SCEMD distributes the information in the hazardous materials business plans and business emergency response plans to emergency response agencies, such as the Fire Department/Hazardous Materials Response Teams. In accordance with Health and Safety Code Chapter 6.95, Section 25500, the SCEMD prepared the Area Plan for Emergency Response to Hazardous Materials Incidents in Sacramento County (2012). The plan describes the responsibilities of local, state, and federal agencies during hazardous materials incidents.

The SCEMD is certified by California's Department of Resource Recycling and Recovery (CalRecycle) for Sacramento County. SCEMD permits and inspects solid waste facilities and enforces state laws pertaining to the storage, processing, and disposal of solid waste. The SCEMD also issues permits for the development and abandonment of groundwater wells, and with respect to the former 28th Street Landfill, the removal and relocation of the soil gas probes and groundwater monitoring wells.

Sacramento County Multi-Hazard Emergency Plan (2011)

The Sacramento County Multi-Hazard Emergency Plan (2011) plan is designed to be a comprehensive disaster preparedness program. The plan identifies goals, objectives, and measures for hazard mitigation and risk reduction for disasters such as earthquakes, flooding, dam or levee failure, hazardous material spills, epidemics, fires, extreme weather, major transportation accidents, and terrorism.

City of Sacramento 2035 General Plan

Applicable goals and policies of the City of Sacramento 2035 General Plan pertaining to Public Health and Safety (PHS) are presented below.

Goal PHS 2.1 Fire Protection and Emergency Medical Services. Provide coordinated fire protection and emergency medical services that support the needs of Sacramento residents and businesses and maintains a safe and healthy community.

Goal PHS 2.2 Fire Prevention Programs and Suppression. The City shall deliver fire prevention programs that protect the public through education, adequate inspection of existing development, and incorporation of fire safety features in new development.

Goal PHS 3.1 Reduce Exposure to Hazardous Materials and Waste. Protect and maintain the safety of residents, businesses, and visitors by reducing, and where possible, eliminating exposure to hazardous materials and waste.

Policy PHS 3.1.1 Investigate Sites for Contamination. The City shall ensure buildings and sites are investigated for the presence of hazardous materials and/or waste contamination before development for which City discretionary approval is required. The City shall ensure appropriate measures are taken to protect the health and safety of all possible users and adjacent properties.

Policy PHS 3.1.2 Hazardous Material Contamination Management Plan. The City shall require that property owners of known contaminated sites work with Sacramento County, the State, and/or Federal agencies to develop and implement a plan to investigate and manage sites that contain or have the potential to contain hazardous materials contamination that may present an adverse human health or environmental risk.

Policy PHS 3.1.4 Transportation Routes. The City shall restrict transportation of hazardous materials within Sacramento to designated routes.

Policy PHS 3.1.6 Compatibility with Hazardous Materials Facilities. The City shall ensure that future development of treatment, storage, or disposal facilities is consistent with the County's Hazardous Waste Management Plan, and that land users near these facilities, or proposed sites for the storage or use of hazardous materials, are compatible with their operation.

Goal PHS 4.1 Natural and Human-made Disasters. Promote public safety through planning, preparedness, and emergency response to natural and human-made disasters.

City of Sacramento Emergency Operations Plan

The purpose of The City of Sacramento Emergency Operations Plan (EOP) is to provide safeguards to minimize loss of life and property damage during natural disasters and emergencies of national defense. The City of Sacramento EOP establishes an Emergency Management Organization and assigns functions and tasks in accordance with California's Standardized Emergency Management System (SEMS). The EOP provides guidance as to disaster response from the initial onset through the cost recovery process. It includes policies, responsibilities, and procedures necessary to protect human health and safety, public and private property, and the environment from the effects of natural and anthropogenic disasters and emergencies. The EOP outlines the specific emergency-related responsibilities of City agencies. For example, the City of Sacramento Police Department is responsible for implementing emergency evacuations, including traffic control plans, while the City of Sacramento Fire Department is the first responder for hazardous materials incidents (City of Sacramento 2005a).

City of Sacramento Evacuation Plan

The purpose of the City of Sacramento Evacuation Plan (2012) is to provide evacuation-specific strategy and information to support and guide the City's Emergency Managers, Emergency Operations Center staff, and other governmental and non-governmental agencies that would be involved with an evacuation event in the City of Sacramento. Therefore, the Evacuation Plan serves as an amendment to the EOP. Flooding is considered the primary threat that would invoke an evacuation in Sacramento. Therefore, much of the Evacuation Plan is dedicated to procedures to be followed in event of a flood emergency. However, the associated strategy and plan details apply to other hazards as well. The City of Sacramento Police Department has divided the City into six districts with each district further divided into three or four police patrol beat areas. The Evacuation Plan provides evacuation routes and locations of sirens and shelters within each police patrol beat area. The City of Sacramento Fire Department maintains updated records of the emergency response and evacuation routes for the City (County of Sacramento 2012) (City of Sacramento 2008).

Hazardous Materials Response

The City's Hazardous Materials Program (HazMat) provides capability for response to hazardous material emergencies (City of Sacramento 2005b). HazMat contains a minimum of 108 firefighters and trained to the Hazardous Materials Response level and includes three Hazardous Materials Response Teams (HMRTs) and one Decontamination Team. Under contractual agreement, HazMat provides 24-hour first response to hazardous materials incidents within the City of Sacramento.

Sacramento Area Council of Governments

In December of 2013, Sacramento Area Council of Governments (SACOG) adopted the Airport Land Use Compatibility Plan (ALUCP) for the Sacramento International Airport. This plan ensures that land uses in and around the Sacramento International Airport are compatible with airport use. The boundaries for this plan, or the Airport Influence Area (AIA), range from the cities of Woodland and Davies to the west, West

Sacramento to the south, the Sutter-Placer County line in the east, and the town of Nicolaus to the north (SACOG 2013). Central and Eastern Sacramento is not included in the AIA.

Sacramento Metropolitan Air Quality Management District

The Sacramento Metropolitan Air Quality Management District (SMAQMD) is responsible for the management and enforcement of a variety of air quality rules including asbestos within the City of Sacramento. Rule 902 of the SMAQMD outlines specific procedures to follow if asbestos is likely to occur within a Project area. These procedures include, but are not limited to, requirements for surveys to be conducted prior to construction, proper worker safety when handling asbestos containing materials, and proper disposal of any of these materials (SMAQMD 2015).

Project Background

Hazardous Materials and Wastes

For purposes of this section, the term "hazardous materials" refers to both hazardous substances and hazardous wastes. A "hazardous material" is defined in the CFR as "a substance or material that...is capable of posing an unreasonable risk to health, safety, and property when transported in commerce" (49 CFR 171.8). California Health and Safety Code Section 25501 defines a hazardous material as follows:

Hazardous material means any material that, because of its quantity, concentration, or physical, or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

Hazardous wastes are defined in California Health and Safety Code Section 25141(b) as wastes that: Because of their quantity, concentration, or physical, chemical, or infectious characteristics, [may either] cause, or significantly contribute to an increase in mortality or an increase in serious illness [, or] pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Section 25532(j) of the Health and Safety Code defines "regulated substances accident risk" to mean a potential for the accidental release of a regulated substance into the environment that could produce a significant likelihood that persons exposed may suffer acute health effects resulting in significant injury or death.

Section (j) defines "regulated substance" to mean any substance that is either of the following (20 CFR Article 2 § 25532):

- (1) A regulated substance listed in Section 68.130 of Title 40 of the Code of Federal Regulations pursuant to paragraph (3) of subsection (r) of Section 112 of the Clean Air Act (42 U.S.C. Sec. 7412(r)(3)).
- (2) (A) An extremely hazardous substance listed in Appendix A of Part 355 (commencing with Section 355.10) of Subchapter J of Chapter I of Title 40 of the Code of Federal Regulations that is any of the following:
 - I. A gas at standard temperature and pressure.
 - II. A liquid with a vapor pressure at standard temperature and pressure equal to or greater than 10 millimeters mercury.
 - III. A solid that is one of the following:
 - a. In solution or in molten form.
 - b. In powder form with a particle size less than 100 microns.
 - c. Reactive with a National Fire Protection Association rating of 2, 3, or 4.
 - IV. A substance that the office determines may pose a regulated substances accident risk pursuant to subclause (II) of clause (i) of subparagraph (B) or pursuant to Section 25543.3.

Acute Hazardous Wastes

Acute hazardous wastes have been found to be fatal to humans in low doses or, in the absence of data on human toxicity, it has been shown in studies to have an oral LD 50 toxicity (rat) of less than 50 milligrams per kilogram, an inhalation LC 50 toxicity (rat) of less than 2 milligrams per liter, or a dermal LD 50 toxicity (rabbit) of less than 200 milligrams per kilogram or is otherwise capable of causing or significantly contributing to an increase in serious irreversible, or incapacitating reversible, illness (CFR 40 261.11).

Asbestos

Naturally occurring asbestos is found in serpentine soils in the foothills of California and is considered a hazardous material due to exposure related public health concerns. The Naturally Occurring Asbestos Hazard Map was reviewed to determine if the Build Alternative would involve construction in areas of relative likelihood for the presence of natural occurring asbestos. Review of information available through USGS indicated that nearest ultramafic rock formation which may be associated with naturally occurring asbestos is approximately 23 miles northeast of the Project area, along the eastern banks of Folsom Lake (USGS, 2015).

Hazardous Air Pollutants

The USEPA defines hazardous emissions, also known as Hazardous Air Pollutants (HAP), as those pollutants that are known or suspected to cause cancer or other serious health effects (USEPA 2017). These pollutants can come from sources such as gasoline, motor oils, asbestos, and paint strippers and can be inhaled or ingested. Fuels such as diesel and gasoline would be required for the operation of construction equipment and are considered Class three, flammable liquid, hazardous materials which can lead to fires or explosions if handled incorrectly. Additionally, oils and lubricants would also be needed for operation of equipment and the control facilities and are also considered Class three hazardous materials.

<u>Schools</u>

The proposed Project site is within the Sacramento City Unified School District. Six schools (Learning Tree Preschool, Alice Birney Elementary, Pony Express Elementary, New Technology High School, Sutterville Preschool, and Sutterville Elementary School) are located within the proposed study area.

Cortese List Government Code Section 65962

As discussed in the regulatory setting above, the Cortese list, which is compiled pursuant to Government Code Section 65962, is used to comply with CEQA requirements and provides a list about the known locations of hazardous material release sites. A record search using Environmental Data Resources (EDR) was used to determine the proximity of a Project to the nearest hazardous materials site.

Emergency Response and Emergency Evacuation Plans

The proposed Project site is within the City's EOP. The City of Sacramento provides fire protection services to the Project area. The Project would be served by the Fire Department Headquarters located at 5770 Freeport Boulevard and Sacramento Fire Station #11 located at 785 Florin Road. Fire stations are located so as to provide a maximum effective service radius of two miles (SGPU DEIR, M-1). This service radius virtually assures blanket coverage of the City. The Sacramento Police Department provides police protection service for the Project area. It is located approximately 0.30 mile from the center of the Project area at 5770 Freeport Boulevard.

Airports and Airstrips

There are no airport plans within the Project area. As discussed in the regulatory setting above, the ALUCP for the Sacramento International Airport is outside of the Central Sacramento area which is where the Build Alternative would be located. The nearest public airport to the Project site is the Sacramento Executive Airport which is located approximately 0.30 mile east of the Project site. The nearest private airport is the UC Davis Medical Center Life Flight base heliport located 2.8 miles north east of the Project site

Fire Hazards

CAL FIRE maintains fire hazard severity zone maps for local and State responsibility areas. Fire hazard is a way to measure physical fire behavior so that people can predict the damage a fire is likely to cause. The proposed Project is located in a local responsibility area maintained by the City. The general background risk for the Project and its vicinity is expected to be low, due to the surrounding area being urban and they type of vegetation (fuel) in the area.

Environmental Setting

A Hazardous Waste Environmental Site Assessment (ESA) was prepared by Geocon Consultants, Inc. in October 2017 to obtain information regarding the potential for existing hazardous substances and/or petroleum product impacts within the proposed Project area. Environmental Data Resources, Inc. (EDR) searched federal, state, and local environmental databases for Recognized Environmental Condition (REC) listings pertaining to the Project area and properties/facilities within one mile of the Project area. Review of the information available indicated that there are no current or historical clean-up sites or hazardous waste facilities directly within the Project site. The following table shows the databases that list the Site and/or offsite properties/facilities and the total number of listed properties/facilities for each database.

Database Name	Number of Listings
FEDERAL DATABASES	
Resource Conservation and Recovery Act [RCRA] – Large Quantity Generators (RCRA-LQG)	2
RCRA – Small Quantity Generators (RCRA-SQG)	16
RCRA - Conditionally Exempt Small Quantity Generators (RCRA-CESQG)	2
Formerly Used Defense Sites (FUDS)	1
Facility Index System/Facility Registry System (FINDS)	15
STATE, LOCAL, AND TRIBAL DATABASES	
Calsites Database (HIST Cal-Sites)	2
School Property Evaluation Program (SCH)	3
Waste Discharge System (WDS)	2
National Pollutant Discharge Elimination System Permits Listing (NPDES)	3
Hazardous Waste & Substance Site List (HIST CORTESE)	17
Recycler Database (SWRCY)	2
Leaking Underground Storage Tank (LUST)	22
Facility Inventory Database (CA FID UST)	11
California Regional Water Quality Control Board's [RWQCB] Spills, Leaks, Investigations, and Cleanup Program (SLIC)	7
Underground Storage Tank (UST)	8
Historical UST Properties/Facilities (HIST UST)	14
Statewide Environmental Evaluation and Planning System UST Listing (SWEEPS UST)	12
California Hazardous Material Incident Report System (CHMIRS)	4
Aboveground Storage Tank (AST)	10

Table 12. Recognized Environmental Conditions Within One Mile of the Site

Database Name	Number of Listings		
Proposition 65 Records (Notify 65)	6		
Cleaner Facilities (DRYCLEANERS)	2		
Clandestine Drug Labs (CDL)	1		
State Response Sites (RESPONSE)	2		
Facility and Manifest Data (HAZNET)	10		
Emissions Inventory Data (EMI)	2		
Department of Toxic Substances Control [DTSC] Site Mitigation and Brownfields Reuse Program (ENVIROSTOR)	14		
EDR PROPRIETARY RECORDS			
EDR Exclusive Historic Gas Stations (EDR Hist Auto)	15		
EDR Exclusive Historic Dry Cleaners (EDR Hist Cleaner)	2		

Off-Site Properties

Forty-nine properties within 1/8 mile of the Site are listed on various non-release-related databases and therefore are unlikely to have caused an REC at the Site. The following table summarizes information regarding properties less than 1/8 mile from the Site that are listed on one or more release-related databases, the status of their listings, and their potential, if any, to cause (or have caused) an REC at the Site.

Table 13. Recognized Environmental Conditions Less Than 1/8 Mile of the Site

Business	Address	Approximate Distance from the Site	Database	Pertinent Information/Potential to Impact the Site
Freeport Farms Development Company	1301 Florin Road	Adjacent to the west of the central portion (cross-gradient to downgradient)	SLIC, DRYCLEANER S, Sacramento Co. CS, Sacramento Co. ML, FINDS, ECHO, SWRCY, RCRA-SQG, HAZNET	This facility is listed on the SLIC database for a release that affected groundwater and soil vapor with tetrachloroethylene (PCE) and trichloroethylene (TCE). The cleanup case is listed as open as of September 2015 with Central Valley Regional Water Quality Control Board (RWQCB) oversight. Additional information about the release at this facility is provided in Section 4.3.1. The DRYCLEANERS database indicates that this facility is inactive. The Sacramento Co. CS, Sacramento Co. ML, FINDS, and ECHO databases provide no pertinent information. The RCRA-SQG listing is for this facility's generation of hazardous waste. Generated wastes include halogenated solvent wastes. No

Business	Address	Approximate Distance from the Site	Database	Pertinent Information/Potential to Impact the Site
Shell	4000 South Land Park Drive	Adjacent to the north of South Land Park Drive in the northern portion (cross- gradient to upgradient)	LUST, Sacramento Co. CS, FINDS, UST, CA FID UST, HIST CORTESE, ECHO Notify 65, HIST UST, SWEEPS UST, RCRA-SQG, Sacramento Co. ML, HAZNET, EDR Hist Auto	 violations are reported. The HAZNET database reports discharge of various solid wastes, but provides no pertinent information. This gas station is listed on the LUST and Sacramento Co. CS databases for a release that affected groundwater with gasoline. The LUST case was closed by the Sacramento County Environmental Management Department (SCEMD) in March 2014. Additional information about this LUST case is provided in Section 4.3.1. The FINDS, UST, CA FID UST, HIST CORTESE, ECHO, and Notify 65 databases provide no pertinent information. The HIST UST and SWEEPS UST database lists three USTs installed in 1982. The RCRA-SQG listing is for this gas station's generation of hazardous waste. Generated wastes include benzene and ignitable wastes. No violations are reported. The Sacramento Co. ML database indicates that three tanks are present. The HAZNET database reports discharge of various solid and liquid wastes, but provides no pertinent information.
Tooley Oil Co#13	1400 Sutterville Road	100 feet east of the northern portion (cross- gradient to downgradient)	LUST, UST, CA FID UST, HIST CORTESE, Sacramento Co. ML, HIST UST, SWEEPS UST, EDR Hist Auto	This gas station is listed on the LUST database for a release that affected only soil with gasoline. The LUST case was closed by the SCEMD in May 1996. Based on the closure of the case and that only soil was affected, the release is unlikely to have caused an REC at the Site. The UST, CA FID UST, HIST CORTESE, and Sacramento Co. ML

Business	Address	Approximate Distance from the Site	Database	Pertinent Information/Potential to Impact the Site
				databases provide no pertinent information.
				The HIST UST and SWEEPS UST database lists four USTs installed in 1982.
				The EDR Hist Auto database lists gas stations from 1956 through 2014.
Shell – John Small's I-5	1315 Florin Road	480 feet west of the central portion (downgradient)	LUST, UST, CA FID UST, HIST CORTESE, HIST UST, SWEEPS UST, Sacramento Co. CS, Sacramento Co. ML, RCRA- SQG	This gas station is listed on the LUST and Sacramento Co. CS databases for a release that affected groundwater with gasoline. The LUST case was closed by the SCEMD in December 2007. Based on the closure of the case and its downgradient position relative to the Site, the release is unlikely to have caused an REC at the Site. The UST, CA FID UST, HIST CORTESE, HIST UST, and Sacramento Co. ML databases provide no pertinent information. The SWEEPS UST database lists four USTs installed sometime prior 1988.
				The RCRA-SQG listing is for this gas station's generation of hazardous waste. Generated wastes include benzene and ignitable wastes. No violations are reported.
Jensen Field	Southwest of Blair Avenue & Belleau Wood Lane	500 feet east of central portion (upgradient)	SLIC	This facility is listed on the SLIC database with an open inactive case. No other pertinent information is provided. Based on its distance from the Site, if a release occurred at this facility is unlikely to have caused an REC at the Site.
Shell	8900 Pocket Road	550 feet west of the southern portion (upgradient)	LUST, UST, HIST CORTESE, Notify 65, FINDS, ECHO, Sacramento Co. CS, Sacramento Co. ML, RCRA- SQG, HAZNET	This gas station is listed on the LUST and Sacramento Co. CS databases for a release that affected groundwater with gasoline. The LUST case is listed as open as of April 2002 with SCEMD oversight. Additional information about the release at this gas station is provided in Section 4.3.1. The UST, HIST CORTESE, Notify 65, FINDS, and ECHO databases provide no pertinent information.

Business	Address	Approximate Distance from the Site	Database	Pertinent Information/Potential to Impact the Site	
				The Sacramento Co. ML indicates indicates that three tanks are present.	
				The RCRA-SQG listing is for this facility's generation of hazardous waste. Generated wastes include ignitable wastes. No violations are reported.	
				The HAZNET database reports discharge of various solid and liquid wastes, but provides no pertinent information.	
				This facility is listed on the SLIC and ENVIROSTOR databases for a release that affected groundwater with PCE and TCE. The cleanup case is listed as open as of July 2015. Additional information about the release at this facility is provided in Section 4.3.1.	
		650 feet east of	SLIC, ENVIROSTOR, DRYCLEANER	The DRYCLEANERS database indicates that this facility is inactive.	
J & J Cleaners	1381-1385 Florin Road	central portion (upgradient)	central portion	central portion	The Sacramento Co. CS and Sacramento Co. ML databases provide no pertinent information.
			LQG, HAZNET	The RCRA-LQG listing is for this facility's generation of hazardous waste. Generated wastes include halogenated solvent wastes. No violations are reported.	
				The HAZNET database reports discharge of unspecified wastes, but provides no pertinent information.	

Orphan Summary

The Orphan Summary identifies facilities that have incomplete address information and could not be specifically plotted. The Orphan Summary lists 109 properties that are greater than ½ mile from the Project. Based on their distance from the Project, none of these properties are expected to have caused an REC at the site.

Historical Use

The ESA evaluated the historical use of the Project and adjacent properties through review of historical aerial photographs, historical topographic maps, and City directories provided by EDR. Railroad tracks are visible on the Project from as early as 1937. Heavy metals are sometimes associated with railroad ballast materials, embankment fill, and from metals in pesticides used for weed control. Therefore the railroad tracks represent a potential environmental concern for the Project. No other land uses that would

suggest the presence of RECs were visible on the Project or adjacent properties in the aerial photographs.

Site Reconnaissance

Matthew Tidwell, Senior Staff Geologist with Geocon, performed a site reconnaissance on August 18, 2017. Mr. Tidwell performed the site reconnaissance by walking throughout the Project site and along the site perimeter to observe site features and conditions. Mr. Tidwell did not observe any slag in the railroad ballast material. Slag is a by-product that remains after a desired metal has been smelted from its raw ore. It has been used historically as railroad ballast material. We observed various domestic (or household) waste throughout the central and southern portions of the Project including glass and plastic bottles, food containers, blankets, and clothes. No evidence of RECs was observed on the Site; however, The onsite railroad tracks suggest that heavy metals may be present in railroad ballast materials and in the embankment fill and that pesticides may have been used for weed control along the tracks. Therefore, the railroad tracks vas recommended to evaluate whether or not pesticides and metals are present at concentrations that would be a threat to the health of future site users.

Additionally, the release at the former Shell gas station (currently Chevron) at 4000 South Land Park Drive, adjacent to the north of South Land Park Drive in the northern portion of the Project site, the release at the Freeport Farms Development Company property at 1301 Florin Road, adjacent to the west of the central portion of the Site, and the release at the operating Shell gas station at 8900 Pocket Road, approximately 550 feet west of the Project site, may have impacted groundwater with MTBE and TPHg beneath the Site (see Table 13).

Geocon recommended to gather a soil sample adjacent to the Freeport Farms Development property to confirm the absence of PCE and TCE or other volatile organic compounds in shallow soil at this portion of the Site.

Although SCEMD closed the LUST case associated with the former Shell gas station (4000 South Land Park Drive), TPHg and MTBE may still be present in groundwater beneath the Site. However, the excavation work (if any) for the proposed onsite trail is unlikely to encounter groundwater.

The PCE and TCE soil vapor and groundwater impacts from the Freeport Farms Development Company property are being investigated, monitored, and remediated by Freeport Farms Development Company, LLC with RWQCB oversight. The MTBE groundwater impacts from the Shell gas station (8900 Pocket Road) are being investigated, monitored, and remediated by Shell with SCEMD oversight. PCE and TCE from the Freeport Farms Development Company property and MTBE from the Shell gas station may be present in groundwater beneath the central and southern portions of the Site, respectively. However, the excavation work (if any) for the proposed onsite trail is unlikely to encounter groundwater. Geocon recommended continuing to monitor the efforts by Freeport Farms Development Company, LLC and Shell to investigate, monitor, and remediate these impacts.

Limited Soil and Railroad Ballast Investigation Results

A soil and ballast material investigation along the railroad tracks was conducted on November 10, 2017 by Rebecca Silva with Geocon to evaluate whether or not pesticides and metals were present at concentrations that would be a threat to the health of future site users. Testing was conducted at 10 locations throughout the Project site (see Figure 17). No specific evidence of contaminant impacts (i.e. chemical odors, staining, features/equipment) other than the railroad and ballast itself were observed during the Phase I ESA, as stated above; therefore, limited investigation borings were advanced at approximate 1/2 mile intervals along the trail alignment.

With the exception of arsenic, COCs were either not detected in the ballast and soil samples, or were detected at concentrations less than the most conservative Tier I residential ESLs and therefore do not represent a threat to human health for future site users.

The reported arsenic concentrations are within the range of naturally occurring concentrations with the exception of arsenic in the soil sample from location B2 which was slightly elevated at a concentration of 21 mg/kg. Outlier concentrations are not uncommon and do not necessarily suggest a contaminant impact. If stained soil or other evidence of contamination are encountered during construction of the trail, a qualified environmental consultant should observe and collect samples for analysis to determine if further action is warranted.

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to hazards and hazardous materials. When an impact is determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

Methodology of Analysis

Using a desktop analysis and the CEQA Environmental Checklist for guidance, the following thresholds of significance for evaluating potential impacts were established. A potential impact would be significant if the Build Alternative would:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
- For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area? Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan;
- For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area;
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact HAZ-1: Potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Build Alternative

Temporary construction activities associated with the Build Alternative would involve the transport and use of gasoline, diesel fuel, hydraulic fuel, solvents, and oils typically associated with operation of construction equipment and vehicles. These chemicals would be used and stored on the Build Alternative site during construction, as well as transported along public roadways. Federal, state, and local laws governing the handling, storage, and transport of these and other hazardous materials and

spill clean ups are discussed in the Regulatory Setting of this section and would be required for the storage and transport of hazardous material for the Build Alternative. These regulations are established to prevent the improper use of materials and to reduce the risk of exposure to the public. The Standard Specifications required by the City of Sacramento Public Works Department regarding construction include the development of a central hazardous material storage and delivery area within a construction site in order to prevent runoff and to ensure hazards and/or nonhazardous materials are not spilled into the environment. Chemicals present on site or used for the Build Alternative would be handled by the contractor in accordance with these regulations and DOSH requirements ensuring the potential for these hazards to create a hazard to the public or the environment is not significant. Therefore, the potential for impacts related to hazardous materials transport, use, or disposal would be considered less than significant.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no new hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would occur.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HAZ-2: Potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Build Alternative

The use of heavy construction equipment requires the use of small amounts of hazardous materials such as oils, fuels, and other potentially flammable substances that have the potential to be released into the environment if not handled properly. The amount of these materials needed for on-site equipment maintenance would not be enough to cause a significant hazard to the public if released since the quantity of these hazardous materials on-site at any one given time would only amount to a refueling truck and the construction equipment. However, measure HAZ-1 would be implemented to require the contractor to prepare an Accidental-Spill Prevention and Response Plan that would include BMPs to control the accidental release of hazardous materials into the environment ensuring spills are appropriately cleaned up and would not result in a release of hazardous materials into the environment. The use of hazardous materials would be temporary and the Project would not include a permanent use or source of hazardous materials. A Phase II testing report was prepared and soil testing was completed. With the exception of arsenic, Contaminates Of Concern (COCs) were either not detected in the ballast and soil samples, or were detected at concentrations less than the most conservative Tier I residential Environmental Screening Levels (ESLs) and therefore do not represent a threat to human health for future site users. The reported arsenic concentrations in the soil sample from location B2 was slightly elevated at a concentration of 21 mg/kg; therefore, further samples will be collected for arsenic analysis on each side of boring B2 prior to construction in order to located the extent and severity of the arsenic contamination. Measures HAZ-1 and HAZ-2 would reduce any potential impacts to a less than significant level from temporary construction equipment and activities.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: HAZ-1 and HAZ-2

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur. The corridor would remain in its existing condition with no changes to the potential for the release of hazardous materials into the environment.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HAZ-3: Potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Build Alternative

The construction phase of the Build Alternative has the potential to result in emissions of toxic air contaminants/HAPs in the form of diesel particulate matter emissions from the operation of diesel-fueled internal combustion engines. Since there are six schools located within one quarter mile of the Build Alternative site there would be some emissions of diesel particulate matter within one quarter mile of schools. Under Measures AQ-1 and AQ-2 discussed in Section 2.2 above, the City would prepare an Emission and Dust Control Plan, to reduce any potential emissions to a less than significant level. Implementation of BMPs and specific instructions for handling of construction equipment such as limiting idle times to a maximum of five minutes along with frequent maintenance of the equipment which ultimately keeps the equipment running and operating like it should would limit the amount of emissions. Additionally, the construction activities would be temporary and intermittent which would further reduce any potential impact.

Hazardous materials used during construction would be typical of common construction activities and would be handled by the contractor in accordance with applicable federal, state, and local regulation for hazardous substances. Additionally, the amount of these materials needed for on-site equipment maintenance would not be enough to cause a significant hazard to the public, or any nearby schools, if released since the quantity of these hazardous materials on-site at any one given time would only amount to a refueling truck and the construction equipment. Measure **HAZ-1**, **AQ-1**, and **AQ-2** would be implemented to require the contractor to prepare an accidental-spill prevention and response plan which would include BMPs to control for the accidental release of hazardous materials into the environment ensuring spills are appropriately cleaned up and would not result in a release of hazardous materials into the environment.

Operation of the Build Alternative would not involve the use of any hazardous materials or have the potential to emit hazardous emissions and thus, would not impact the five schools within one-quarter mile of the Project site. Therefore, the potential for the Build Alternative to emit hazardous emissions within one-quarter miles of a school during both construction and operation would be less than significant with mitigation incorporated.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: HAZ-1, AQ-1 and AQ-2 in Section 2.2.

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur. The corridor would remain in its existing condition with no changes to the potential for the release of hazardous materials into the environment.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HAZ-4: Potential to be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

Build Alternative

The Build Alternative is not located on the Cortese list database as a potentially hazardous site. Additionally, the hazardous materials that would be used during construction would include oils, fuels, and other potentially flammable substances which would be used in small amounts and for a temporary period of time during construction. Therefore, the Build Alternative does not have the potential to create a significant hazard to the public as a result of the listing or use of substantial amounts of hazardous materials. As such, no impact would occur, and no mitigation measures would be required.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, the corridor would remain in its existing condition. Additionally, there are currently no sites within the corridor located on the Cortese list database as a potentially hazardous site.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HAZ-5: Potential to be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?

Build Alternative

The Build Alternative site is located within 0.30 mile of Sacramento Executive Airport. Although this airport is located within two miles of the Build Alternative site, the Build Alternative would not have the potential to result in a safety hazard because the construction work would be temporary and once constructed, the Build Alternative would be used for recreational purposes. No impact associated with a safety hazard from nearby airports is anticipated to occur and no mitigation measures would be required.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, the corridor would remain in its existing condition.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HAZ-6: Potential to be within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area.

Build Alternative

The UC Davis Medical Center Life Flight base heliport is located more than 2 miles north east of the Project site; therefore, the Project would not result in a safety hazard for people residing or working in the area. Additionally, the heliport located in this area is only used for emergencies which does not include consistent, daily uses, further limiting any potential impacts. Therefore, the Build Alternative would have no impact on safety hazards associated with working in the vicinity of a private airstrip.

Level of Significance: No Impact.

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, the corridor would remain in its existing condition.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HAZ-7: Potential to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Build Alternative

The Build Alternative includes multiple access points. Two parking lots would be constructed for access to the trail from San Mateo Way and Freeport Boulvard. The public can also access the trail from Sutterville Road, S. Land Park Drive, Normandy Lane, Fruitridge Road, 35th Avenue, 43rd Avenue, Florin Road, and Pocket Road. The trail will also be accessible from Z'Berg Park, Charlie Jensen Park, and Belle Cooledge Community Center Park.

The Build Alternative is not anticipated to have any impact to the existing emergency evacuation plan. As discussed further in Section 3.13, a traffic control plan would be incorporated into the Project to limit any potential impacts from construction of the trail through any intersections under Measure **TRA-1**. The traffic control plan would also include a discussion of expected construction schedules and locations, traffic control measures, and coordination with emergency response agencies to ensure that emergency access remains possible at all times. Therefore, the Project would have a less than significant impact with mitigation incorporated on emergency response.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: See TRA-1

No Project Alternative

The multi-use trail would not be constructed; therefore, the corridor would remain in its existing condition. There would be no potential to impair implementation of or physically interfere with an adopted emergency response plan compared to the existing condition.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HAZ-8: Potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Build Alternative

The Build Alternative corridor is not designated as a wildland and the City of Sacramento is not considered to have a high wildland fire danger (City of Sacramento Fire Department 2016). Additionally, the trail would be used for recreational purposes which would limit the exposure of people to risks from wildfires. Further, the new trail would provide maintenance access to the City resulting in regular removal of brush and other wildfire fuel. Therefore, the Build Alternative would have a less than significant impact related to wildland fires.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, the corridor would remain in its existing condition with a low risk of wildfires due to unmaintained brush and vegetation. The City would continue to lack maintenance access which would allow for more regular removal of brush and other wildfire fuel. Therefore, the No Project Alternative would have a less than significant impact related to wildland fires.

Level of Significance: Less Than Significant.

Required Mitigation: None Required.

Mitigation Measures

HAZ-1: The contractor shall prepare a Spill Prevention, Control, and Countermeasure Program (SPCCP) prior to the commencement of construction activities. The SPCP shall include information on the nature of all hazardous materials that shall be used on-site. The SPCP shall also include information regarding proper handling of hazardous materials, and clean-up procedures in the event of an accidental release. The phone number of the agency overseeing hazardous materials and toxic clean-up shall be provided in the SPCCP.

HAZ-2: Additional testing for arsenic on each side of boring B2 shall occur prior to construction. Should arsenic concentrations exceed the range of naturally occurring concentrations, the City and Contractor shall follow the appropriate protocol for soil disposal and handling. If stained soil or other evidence of contamination are encountered during construction of the trail, a qualified environmental consultant should observe and collect samples for analysis to determine if further action is warranted.

2.8 HYDROLOGY AND WATER QUALITY

This section describes the environmental and regulatory setting for hydrology and water quality. It also describes impacts on hydrology and water quality that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal

Federal Clean Water Act

The Clean Water Act (CWA) (33 U.S.C. Section 1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). Section 401 of the CWA regulates surface water quality and a Water Quality Certification is required for federal actions (including construction activities) that may entail impacts to surface water. In California, NPDES permitting authority is delegated to, and administered by, the nine Regional Water Quality Control Boards (RWQCB).

NPDES Construction Permit

The federal CWA prohibits certain discharges of stormwater containing pollutants except in compliance with a NPDES permit. The federal statutes and regulations require discharges to surface waters comprised of storm water associated with construction activity, including demolition, clearing, grading, and excavation, and other land disturbance activities (except operations that result in disturbance of less than one acre of total land area and/or discharges to municipalities with combined stormwater and sewer systems) to obtain coverage under an NPDES permit. The NPDES permit must require implementation of Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to reduce or eliminate pollutants in storm water runoff.

National Flood Insurance Act

The Federal Emergency Management Agency (FEMA) is responsible for managing the National Flood Insurance Program (NFIP), which makes federally-backed flood insurance available for communities that agree to adopt and enforce floodplain management ordinances to reduce future flood damage.

The NFIP, established in 1968 under the National Flood Insurance Act, requires that participating communities adopt certain minimum floodplain management standards, including restrictions on new development in designated floodways, a requirement that new structures in the 100-year flood zone be elevated to or above the 100-year flood level known as base flood elevation. To facilitate identifying areas with flood potential, FEMA has developed Flood Insurance Rate Maps (FIRMs) that can be used for planning purposes, including floodplain management, flood insurance, and enforcement of mandatory flood insurance purchase requirements.

State

Porter Cologne Water Quality Control Act

The State of California established the State Water Resources Control Board (SWRCB), which oversees the nine RWQCBs, through the Porter-Cologne Water Quality Control Act (Porter-Cologne). Through the enforcement of the Porter Cologne Act, the SWRCB determines the beneficial uses of the waters (surface and groundwater) of the State, establishes narrative and/or numerical water quality standards, and initiates policies relating to water quality. The SWRCB and, more specifically, the RWQCB, is authorized to prescribe Waste Discharge Requirements (WDRs) for the discharge of waste, which may impact the waters of the State. Furthermore, the development of water quality control plans, or Basin Plans, are required by Porter-Cologne to protect water quality. The SWRCB issues both General Construction Permits and individual permits under the auspices of the federal NPDES program. Per the SWRCB

General Construction Permit, construction activity that discharges to Combined Sewer Systems is an activity not covered under the general permit and therefore the permit does not apply.

Local

The Sacramento Area Flood Control Agency

The Sacramento Area Flood Control Agency (SAFCA) was formed in 1989 by local agencies anxious to address the deficiencies in Sacramento's flood control system identified by the United States Army Corp of Engineers (USACE) following the flood of 1986. Through a joint exercise of powers agreement, the City of Sacramento, County of Sacramento, the Sacramento County Water Agency, Sutter County, the Sutter County Water Agency, the American River Flood Control District, and Reclamation District 1000 (RD 1000) pooled their common flood-control authorities, established a management structure, and identified a program for improving Sacramento's flood control system. This program has three elements:

- 1. Ensure the structural integrity of the existing levee system;
- 2. Provide at least a 100-year level of flood protection as quickly as possible to the areas within the FEMA 100-year floodplain by, among other actions, increasing the space available for flood control at Folsom Dam and Reservoir (Folsom); and
- 3. Work toward achieving at least a 200-year level of flood protection for the Sacramento area.

SAFCA finances the local share of the cost to improve Sacramento's flood control system by creating assessment districts and levying annual assessments on properties which benefit from the improvements. These assessments are billed on Sacramento County's and Sutter County's annual real property tax bill.

SAFCA has carried out its flood risk management program on a step-by-step basis. It has succeeded in moving flood zone properties in Natomas and North Sacramento from a high- risk status (less than 100-year protection) to a moderate-risk status (greater than 100-year but less than 200-year protection) by raising and strengthening levees around the Natomas basin and along lower Dry and Arcade creeks. When this work is completed, these properties will have greater than a 200-year level of protection and a relatively low risk of flooding. Outside the North Area, steps have been taken to ensure the integrity of the levee system along the Sacramento and American rivers and to secure additional flood storage space at Folsom Reservoir on an interim basis.

The American River Flood Control District

The American River Flood Control District (ARFCD) is the part of SAFCA that provides flood protection for the Project site and surrounding neighborhoods. Formed by an act of the State Legislature in 1927, its mission is to protect the citizenry by maintaining the 40 miles of levees along the American River and portions of Steelhead, Arcade, Dry, and Magpie creeks. The ARFCD's year-round maintenance activities are designed to prevent degradation of the levees' structural stability and to keep the surface of the levees accessible and clearly visible so problems can be detected, and flood emergency equipment can be moved in when needed. In addition to routine operation and maintenance activities, the ARFCD implements Projects along the levee to improve accessibility. For example, in 2008, the ARFCD began working with numerous landowners to remove abandoned encroachments in River Park (such as deteriorating retaining walls, debris, and mounds of dirt), which resulted in a clean levee slope free of obstructions that will no longer compromise levee safety.

City of Sacramento 2035 General Plan

The following City of Sacramento 2035 General Plan goals and policies are applicable to hydrology and water quality.

Environmental Constraints: Flooding Hazards

Goal EC 2.1 Flood Protection. Protect life and property from flooding.

Policy EC 2.1.2 Regional Flood Management Planning Efforts. The City shall participate in the California Department of Water Resources (DWR) Regional Flood Management Planning effort for the Lower Sacramento/Delta North region.

Policy EC 2.1.4 200-year Flood Protection. The City shall work with local, regional, State, and Federal agencies to achieve by 2025 at least 200-year flood protection for all areas of the City.

Policy EC 2.1.12 New Development Design. The City shall require new development located within a special (100-year) flood hazard area to be designed to minimize the risk of damage in the event of a flood.

Environmental Resources: Water Resources

Goal ER 1.1 Water Quality Protection. Protect local watersheds, water bodies and groundwater resources, including creeks, reservoirs, the Sacramento and American rivers, and their shorelines.

Policy ER 1.1.3 Stormwater Quality. The City shall control sources of pollutants and improve and maintain urban runoff water quality through stormwater protection measures consistent with the City's NPDES Permit.

Policy ER 1.1.4 New Development. The City shall require new development to protect the quality of water bodies and natural drainage systems through site design, source controls, stormwater treatment, runoff reduction measures, BMPs and Low Impact Development (LID), and hydromodification strategies consistent with the City's NPDES Permit.

Policy ER 1.1.5 Limit Stormwater Peak Flows. The City shall require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.

Policy ER 1.1.7 Construction Site Impacts. The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

City of Sacramento Stormwater Management and Control Code

The City Stormwater Management and Control Code (Chapter 13.16 of the City Code) is intended to control non-stormwater discharges to the stormwater conveyance system; eliminate discharges to the stormwater conveyance system from spills, dumping, or disposal of materials other than stormwater; and reduce pollutants in urban stormwater discharges to the maximum extent practicable. Non-stormwater discharges are prohibited except where the discharge is regulated under a NPDES permit (See the descriptions of the NPDES in the discussions of federal and state water quality regulations above). Discharges to the stormwater conveyance system of pumped groundwater not subject to a NPDES permit may be permitted upon written approval from the City and in compliance with the City's conditions of approval.

City of Sacramento Grading. Erosion, and Sediment Control Ordinance

The City Grading, Erosion, and Sediment Control Ordinance (Title 15, Chapter 15.88 of the City Code) sets forth rules and regulations to control land disturbances, landfill, soil storage, pollution, and erosion and sedimentation resulting from construction activities. With limited exceptions, grading approval must be received from the City's Department of Utilities (DOU) before construction. All Project applicants, regardless of Project location, are required to prepare and submit separate erosion and sediment control plans applicable to the construction and post-construction periods. The ordinance also specifies other requirements, such as written approval from the City for grading work within the right of way (ROW) of a public road or street, or within a public easement.

City of Sacramento SQIP

The City of Sacramento Stormwater Quality Improvement Program (SQIP) provides a comprehensive plan to direct the Sacramento City Stormwater Management Program and its priorities and activities. Included in the City of Sacramento SQIP is information on the Sacramento City Stormwater Management Program's history and accomplishments as well as a description of specific activities. The City of Sacramento Stormwater Management Program is designed to reduce stormwater pollution to the

maximum extent practicable and eliminate prohibited non-stormwater discharges in accordance with federal and state laws and regulations.

The Construction Element in the SQIP was designed to reduce the discharge of stormwater pollutants to the maximum extent practicable by requiring construction sites to reduce sediment in site runoff and reduce other pollutants such as litter and concrete wastes through good housekeeping procedures and proper waste management. The New Development Element in the SQIP was designed to protect local creeks and rivers by reducing the discharge of stormwater pollutants that could result from new developments to the maximum extent practicable and by mitigating increased flows that could cause erosion and degrade habitat.

City of Sacramento Floodplain Management Ordinance

This Floodplain Management Ordinance is designed to promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas. The Ordinance regulates development which is or might be dangerous to health, safety, and property by requiring at the time of initial development, or substantial improvement, methods of protection against flood damage in areas vulnerable to flooding in order to minimize flood damage. The Ordinance regulates the following developmental impacts: filling, grading, or erosion, alteration of natural flood plains, stream channels or water courses, the imposition of barriers which increase flood hazards, or any other impacts that aggravate or cause flood hazards.

Resolution 93-164

Resolution 93-164, with regard to storm drainage, is intended to prevent street flooding during 10-year return storms and to prevent flooding of structures during 100-year return storms at complete buildout in each drainage basin.

City of Sacramento NPDES Permit

The City of Sacramento NPDES permit (Order No. R5-2016-0040, NPDES No. CAS0085324) requires implementation of programs that establish priorities based on addressing urban pollutants of concern, to reduce the level of pollutants in stormwater discharges from municipal separate storm sewer systems and requires that any change in water quality will not unreasonably affect the present and anticipated beneficial use of receiving waters and will not result in water quality less than that prescribed in SWRCB policies. The SQIP, described earlier, provides a comprehensive plan to direct the City's Stormwater Management Program priorities and activities, including program management, target pollutant reduction strategy, monitoring program, program element implementation (i.e., industrial, municipal, construction, and public education and outreach elements), and program evaluation.

Central Valley Regional Water Quality Control Board Order No. R5-2015-0045

On April 17, 2015, the Central Valley Regional Water Quality Control Board (CVRWQCB) adopted the Waste Discharge Requirements for the City of Sacramento Combined Wastewater Collection and Treatment System (Order No. R5-2015-0045, NPDES No. CA0079111) which describe discharge prohibitions to the Sacramento River unless certain specified conditions have been met or authorizations granted; effluent limitations and discharge specifications for total suspended solids, settleable solids, and chlorine; receiving water limitations to the Sacramento River, monitoring and reporting requirements; and other standard and special provisions.

General Order for Dewatering and Other Low-Threat Discharges to Surface Waters

The CVRWQCB has adopted a general NPDES permit for short-term discharges of small volumes of clean or relatively pollutant- free wastewater from certain construction-related activities that pose little or no threat to water quality. Permit conditions for the discharge of these types of wastewaters to surface water are specified in "General Order for Dewatering and Other Low-Threat Discharges to Surface Waters" (Order No. R5-2013- 0074, NPDES Permit No. CAG995001). Discharges may be covered by the permit provided they are either (1) four months or less in duration or (2) the average dry weather discharge does not exceed 0.25 mgd. Construction dewatering, well development water, pump/well testing, and miscellaneous dewatering/low-threat discharges are among the types of discharges that may

be covered by the permit. The general permit also specifies standards for testing, monitoring, and reporting, receiving water limitations, and discharge prohibitions.

Environmental Setting

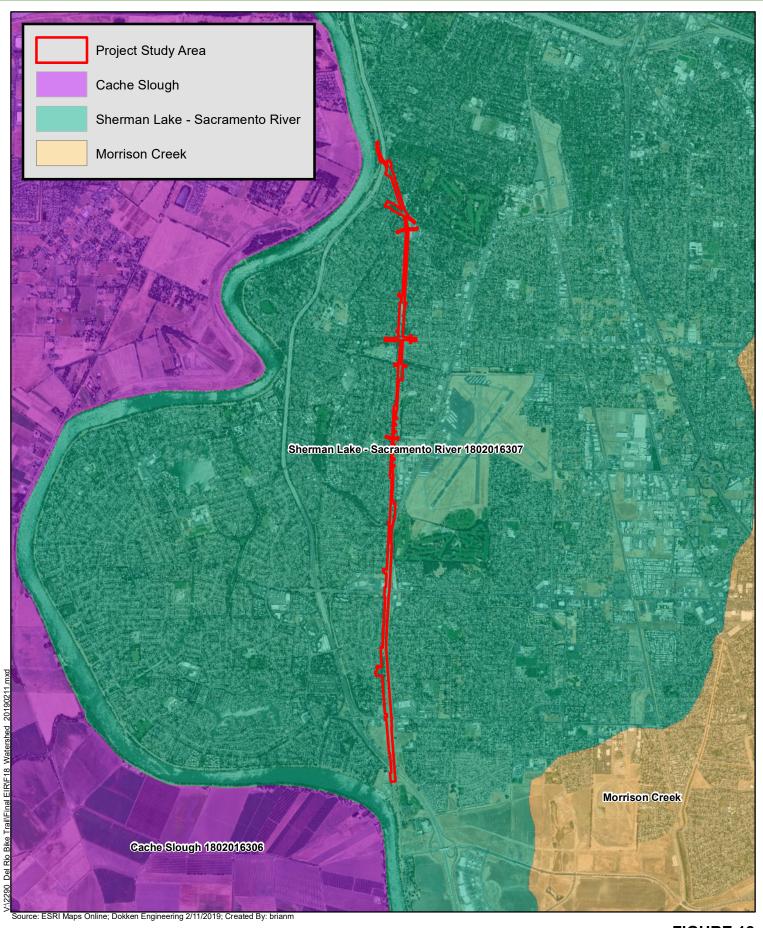
The Project area is located within the Sacramento River Hydrologic Region which encompasses an area of approximately 17.4 million acres (27,200 square miles) and contains all or large portions of Modoc, Siskiyou, Lassen, Shasta, Tehama, Glenn, Plumas, Butte, Colusa, Sutter, Yuba, Sierra, Nevada, Placer, Sacramento, El Dorado, Yolo, Solano, Lake, and Napa Counties (California Department of Water Resources, 2003). Most of northern California is located in the Sacramento River Hydrologic Region, which encompasses several watersheds of various sizes. Major watersheds in the Sacramento River Hydrologic Region and the Project area include the American River, Cosumnes River, and Sacramento River. Ultimately, these watersheds drain to the Sacramento–San Joaquin River Delta. Figure 18 shows the local watersheds surrounding the Project area.

Based on survey results, the USGS Sacramento West and Clarksburg 7½ minute quadrangle topographic maps, Federal Emergency Management Agency (FEMA) flood maps, and the USFWS National Wetlands Inventory (NWI 2017), a total of 4 aquatic features were found within the BSA. Of the four features identified, only two of the features identified within the limits of the BSA are considered waters of the U.S. and State (the Sacramento Drainage Canal and an above ground storm drainage feature). The remaining two aquatic features identified within the BSA are small, non-jurisdictional depressional wetland features (Wetland 1 and Wetland 2). Figure 15 in Section 2.3 shows the locations of surface waters in the Project area.

The first feature located within the BSA is an above ground storm drainage located approximately 300 feet south of the intersection of Belleau Wood Lane and Freeport Boulevard, and west of Freeport Boulevard. The second feature is the Sacramento Drainage canal located at the southern terminus of the Project. The remaining two freshwater wetland features were identified during the May 2017 jurisdictional delineations. Wetland feature 1 is located approximately 700 feet south of Pocket Road and approximately 150 feet west of Freeport Boulevard at a southwest orientation to the Pocket Road and Freeport Boulevard intersection. Wetland feature 2 is located approximately 350 feet northeast of the intersection of Farm Dale Way and Branwood Way.

Water quality is most affected by land development, agriculture, grazing, and urban runoff. Constituents found in urban runoff vary during a storm event, from event to event within a given area, and from area to area within a given watershed. Variances can be the result of differences in rainfall intensity and occurrence, geographic features, and the land use of the area, as well as vehicle traffic and the percentage of impervious surface. Furthermore, sediment runoff from construction sites without adequate erosion control measures can contribute sediments, pesticides, fertilizers, and other pollutants to receiving waters.

As required by the Porter-Cologne Act, the Central Valley RWQCB has developed water quality objectives for waters within their jurisdiction to protect the beneficial uses of those waters and published them in their Basin Plan. The Basin Plan also establishes implementation programs to achieve these water quality objectives and requires monitoring to evaluate the effectiveness of these programs. Water quality objectives must comply with the state antidegradation policy (State Water Board Resolution No. 68-16), which generally restricts the reduction of water quality of surface or ground waters even though such a reduction in water quality might still allow the protection of the beneficial uses associated with the water prior to the quality reduction. The Central Valley Regional Water Quality Control Board intends to maintain this quality with enforcement of the water quality objectives summarized in Table 14 (CRWQCB, 2011).



3

Miles

2

FIGURE 18 Watersheds ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

1

Constituent	Water Quality Objective
Bacteria	In waters designated REC-1, the fecal coliform concentration based on a minimum of not less than five samples for any 30- day period shall not exceed a geometric mean of 200/100 mL, nor shall more than 10 percent of the total number of samples taken during any 30-day period exceed 400/100 mL.
Biostimulatory Substances	Water shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.
Chemical Constituents	Waters shall not contain chemical constituents in concentrations that adversely affect beneficial uses. At a minimum, water designated MUN shall not contain concentrations of chemical constituents in excess of the maximum contaminant levels specified in the following provisions of Title 22 of the California Code of Regulations, which are incorporated by reference into this plan: Tables 64431-A (Inorganic Chemicals) and 64431-B (Fluoride) of Section 64431, Table 64444-A (Organic Chemicals) of Section (Fluoride) of Section 64431, Table 64444-A (Organic Chemicals) of Section Consumer Acceptance Limits) and 64449-B (Secondary Maximum Contaminant Levels-Ranges) of Section 64449. At a minimum, water designated for use as domestic or municipal supply (MUN) shall not contain lead in excess of 0.015 mg/l. (See below for specific chemical constituent objectives for specific water bodies.
Color	Water shall be free of discoloration that causes nuisance or adversely affects beneficial uses.
Dissolved Oxygen	For surface water bodies outside the legal boundaries of the Delta, the monthly median of the mean daily dissolved oxygen (DO) concentration shall not fall below 85 percent of saturation in the main water mass, and the 95 percentile concentration shall not fall below 75 percent of saturation. The dissolved oxygen concentrations shall not be reduced below the following minimum levels at any time: • Waters designated WARM 5.0 mg/l • Waters designated COLD 7.0 mg/l • Waters designated SPWN 7.0 mg/l
Floating Material	Water shall not contain floating material in amounts that cause nuisance or adversely affect beneficial uses.
Oil and Greases	Waters shall not contain oils, greases, waxes, or other materials in concentrations that cause nuisance, result in a visible film or coating on the surface of the water or on objects in the water, or otherwise adversely affect beneficial uses.
рН	The pH shall not be depressed below 6.5 nor raised above 8.5.

Table 14. Central Valley RWQCB Water Quality Objectives for Inland Surface Waters

Constituent	Water Quality Objective
Pesticides	 No individual pesticide or combination of pesticides shall be present in concentrations that adversely affect beneficial uses. Discharges shall not result in pesticide concentrations in bottom sediments or aquatic life that adversely affect beneficial uses. Total identifiable persistent chlorinated hydrocarbon pesticides shall not be present in the water column at concentrations detectable within the accuracy of analytical methods approved by the Environmental Protection Agency or the Executive Officer. Pesticide concentrations shall not exceed those allowable by applicable antidegradation policies (see State Water Resources Control Board Resolution No. 68-16 and 40 C.F.R. Section 131.12.). Pesticide concentrations shall not exceed the lowest levels technically and economically achievable. Waters designated for use as domestic or municipal supply (MUN) shall not contain concentrations of pesticides in excess of the Maximum Contaminant Levels set forth in California Code of Regulations, Title 22, Division 4, Chapter 15. Waters designated for use as domestic or municipal supply (MUN) shall not contain concentrations of thiobencarb in excess of 1.0 µg/l. For the purposes of this objective, the term pesticide shall include: (1) any substance, or mixture of substances which is intended to be used for defoliating plants, regulating plant growth, or for preventing, destroying, repelling, or mitigating any pest, which may infest or be detrimental to vegetation, man, animals, or households, or be present in any agricultural or nonagricultural environment whatsoever, or (2) any spray adjuvant, or (3) any breakdown products of these materials that threaten beneficial uses. Note that discharges of "inert" ingredients included in pesticide formulations must comply with
Radioactivity	all applicable water quality objectives. Radionuclides shall not be present in concentrations that are deleterious to human, plant, animal, or aquatic life, nor which result in the accumulation of radionuclides in the food web to an extent that presents a hazard to human, plant, animal, or aquatic life. At a minimum, waters designated MUN shall not contain concentrations of radionuclides in excess of the maximum contaminant levels specified in Table 4 (MCL Radioactivity) of Section 64443 of Title 22, California Code of Regulations.
Salinity	Electrical Conductivity (at 25°C) shall not exceed 150 micromhos/cm (90 percentile) in well-mixed waters of the Feather River.
Sediment	The suspended sediment load and suspended sediment discharge rate of waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses.
Settleable Material	Waters shall not contain substances in concentrations that result in the deposition of material that causes nuisance or adversely

Constituent	Water Quality Objective
	ffects beneficial uses.
	Vaters shall not contain suspended material in concentrations nat cause nuisance or adversely affect beneficial uses.
Tastes and Odors	Vaters shall not contain taste- or odor-producing substances in oncentrations that cause nuisance, adversely affect beneficial uses, or impart undesirable tastes or odors to fish flesh or other adible products of aquatic origin or to domestic or municipal vater supplies.
w de Temperature V aj	Elevated temperature wastes shall not cause the temperature of vaters designated COLD or WARM to increase by more than 5 egrees Fahrenheit above natural receiving water temperature. In determining compliance with the above limits, the Central valley Regional Water Quality Control Board may prescribe ppropriate averaging periods provided that beneficial uses will the fully protected.
Toxicity G G G G G G G G G G G G G G G G G G G	All waters shall be maintained free of toxic substances in oncentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life. This objective applies egardless of whether the toxicity is caused by a single ubstance or the interactive effect of multiple substances. Compliance with this objective will be determined by analyses of indicator organisms, species diversity, population density, rowth anomalies, biotoxicity tests of appropriate duration, or ther methods as specified by the Central Valley Regional Water Quality Control Board.
W ori at th W U tu W	 Vaters shall be free of changes in turbidity that cause nuisance in adversely affect beneficial uses. Increases in turbidity ttributable to controllable water quality factors shall not exceed the following limits: Where natural turbidity is less than 1 Nephelometric Turbidity Jnit (NTU), controllable factors shall not cause downstream urbidity to exceed 2 Where natural turbidity is between 1 and 5 NTUs, increases hall not exceed 1 NTU. Where natural turbidity is between 5 and 50 NTUs, increases shall not exceed 20 percent. Where natural turbidity is equal to or between 50 and 100 NTUs, increases shall not exceed 10 NTUs. Where natural turbidity is greater than 100 NTUs, increases shall not exceed 10 percent.
a	n determining compliance with the above limits, appropriate veraging periods may be applied provided that beneficial uses vill be fully protected.

Under the Porter-Cologne Water Quality Control Act, the Regional board is required to consider beneficial uses when instituting water quality objectives and described these beneficial uses as follows:

"Beneficial uses of the waters of the State that may be protected against quality degradation include, but are not necessarily limited to, domestic, municipal, agricultural, and industrial supply; power generation; recreation; aesthetic enjoyment; navigation; and preservation and enhancement of fish, wildlife, and other aquatic resources or preserves."

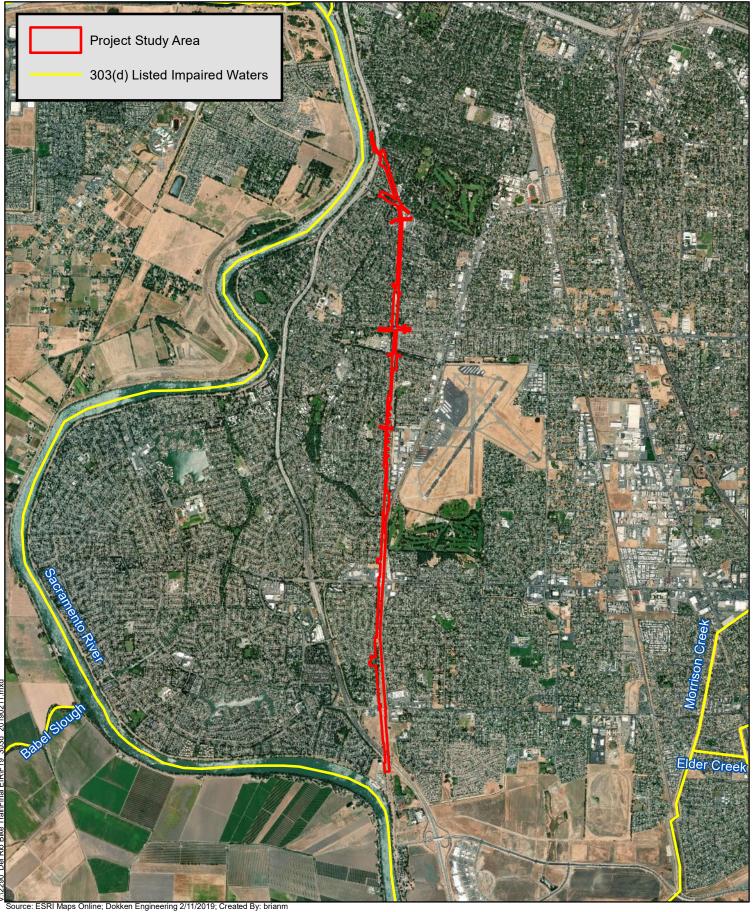
The Regional Board assigns beneficial uses for tributary streams based on the uses assigned to the named waterbody that the tributary connects with. Table 15 below defines these beneficial uses for the Sacramento River, a waterway near the vicinity of the Project. In addition, Table 15 also includes the ground water beneficial uses for the Sacramento River. Existing beneficial uses of surface waters within the Sacramento River (Hydro Unit Number 526) include municipal and domestic supply (MUN), agricultural supply (AGR), hydropower generation (POW), contact water recreation (REC-1), non-contact water recreation (REC-2), cold freshwater habitat (COLD), warm and cold spawning (SPWN), and wildlife habitat (WILD) (CRWQCB 2014).

	Category	5. Beneficial Uses Definition
MUN	Municipal and Domestic Supply	Uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.
AGR	Agriculture Supply	Uses of water for farming, horticulture, or ranching including irrigation or support of vegetation for range grazing.
IND	Service Supply	Uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well repressurization.
POW	Hydropower Generation	Uses of water for hydropower generation.
REC I	Water Contact Recreation	Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, and use of natural hot springs.
REC II	Non-Contact Water Recreation	Uses of water for recreational activities involving proximity to water, but not normally involving contact with water where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tide-pool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
WARM	Warm Freshwater Habitat	Uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
COLD	Cold Freshwater Habitat	Uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
MIGR	Migration of Aquatic Organisms	Uses of water that support habitats necessary for migration or other temporary activities by aquatic organisms, such as anadromous fish.
SPWN	Spawning, Reproduction, and/or Early Development (Warm & Cold)	Uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish.
WILD	Wildlife Habitat	Uses of water that support terrestrial ecosystems including, but not limited to, the preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.

Table 15. Beneficial Uses

303(d) listed waters are a State's list of impaired and threatened waters (e.g. stream/river segments, lakes). States are required to submit their list for Environmental Protection Agency (EPA) approval every

two years. For each water on the list, the State identifies the pollutant causing the impairment, when known. In addition, the state assigns a priority for development of Total Maximum Daily Loads (TMDL) based on the severity of the pollution and the sensitivity of the uses to be made of the waters. There are no 303(d) listed water bodies within the immediate Project study area. However, 303(d) listed waterways near the Project area have been identified. The closest of these is the Sacramento River (northern portion of the Delta Waterway), which the State has determined to primarily be impaired for pesticides and heavy metals. Figure 19 shows 303(d) listed impaired water bodies within the vicinity of the Project area. Table 16 (below) lists pollutants that have contributed to water quality exceedances, their sources, and the TMDL status (both required and approved) for the 303(d) listed water bodies identified.



3 ∎Miles

2

FIGURE 19 303(d) Listed Waters ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

1

	Pollutant	Source	Size	Status
Delta Waterways (Northern Portion)	Chlordane	Source Unknown	6795 Acres	TMDL required
Delta Waterways (Northern Portion)	Chlorpyrifos	Source Unknown	6795 Acres	Being addressed with USEPA approved TMDL
Delta Waterways (Northern Portion)	DDT (dichlorodiphenyltrichloroethane)	Source Unknown	6795 Acres	TMDL required
Delta Waterways (Northern Portion)	Diazinon	Source Unknown	6795 Acres	Being addressed with USEPA approved TMDL
Delta Waterways (Northern Portion)	Dieldrin	Source Unknown	6795 Acres	TMDL required
Delta Waterways (Northern Portion)	Group A Pesticides	Source Unknown	6795 Acres	TMDL required
Delta Waterways (Northern Portion)	Invasive Species	Source Unknown	6795 Acres	TMDL required
Delta Waterways (Northern Portion)	Mercury	Source Unknown	6795 Acres	TMDL required
Delta Waterways (Northern Portion)	PCBs (Polychlorinated biphenyls)	Source Unknown	6795 Acres	TMDL required
Delta Waterways (Northern Portion)	Unknown Toxicity	Source Unknown	6795 Acres	TMDL required
Morrison Creek	Diazinon	Agriculture	26 Miles	Being addressed with USEPA approved TMDL
Morrison Creek	Pentachlorophenol (PCP)	Source Unknown	26 Miles	TMDL required
Morrison Creek	Pyrethroids	Source Unknown	26 Miles	TMDL required
Morrison Creek	Sediment Toxicity	Source Unknown	26 Miles	TMDL required
Elder Creek	Chlorpyrifos	Storm sewers	11.07 miles	Being addressed with USEPA approved TMDL
Elder Creek	Diazinon	Source Unknown	11.07 miles	Being addressed with USEPA approved TMDL
Elder Creek	Pyrethroids	Source Unknown	11.07 miles	TMDL required
Elder Creek	Sediment Toxicity	Source Unknown	11.07 miles	TMDL required

Table 16. TMDLs Within the Project Vicinity

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to hydrology and water quality. When an impact is determined to be significant, mitigation measures have been identified that would reduce or avoid that impact.

Methodology of Analysis

Using data published by the CVRWQCB, the DWR, and agencies releasing or diverting flow from the City's Combined Sewer System in conjuncture with CEQA Environmental Checklist for guidance, the following thresholds of significance were established and were analyzed and evaluated to determine whether impacts to hydrology and water quality would be significant. Specifically, the analysis considered that there could be a potentially significant adverse effect if the Build Alternative would:

- Violate any water quality standards or waste discharge requirements;
- Substantially deplete groundwater supplies or interfere substantially with groundwater
 recharge such that there would be a net deficit in aquifer volume or a lowering of the local
 groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to
 a level which would not support existing land uses or planned uses for which permits have
 been granted);
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;
- Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows; or,
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam;
- Cause inundation by seiche, tsunami, or mudflow.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact HYD-1: Potential to violate any water quality standards or waste discharge requirements.

Build Alternative

Project activities such as construction of the multi-use trail would create new impervious surfaces. This would result in an incremental reduction in the amount of natural soil surfaces available for infiltration of rainfall and runoff, potentially generating additional sediment runoff during storm events which could degrade the quality of receiving waters. During storm events, sediment is transported via runoff to stormwater drainage systems. Absent controls, contaminated runoff waters could flow into the stormwater drainage systems that discharge into rivers, agricultural ditches, sloughs, and channels and ultimately could degrade the water quality of any of these water bodies.

The Project would result in an increase of approximately 9.5 acres of paved surface area, which would contribute to an increase in the volume of storm water runoff from the multi-use trail surface that could enter the drainage system and eventually the waterways within the Project area. Impacts to water quality may result from sediment-laden storm water discharged into these waterways. Although the Project would potentially increase storm water runoff, the Build Alternative would adhere to all applicable Phase I MS4 NPDES requirements. With the inclusion of permanent treatment control BMPs, as specified by Avoidance and Minimization Measure WQ-1, long-term Project impacts to water quality are anticipated to be minimal.

Although none of the waterways within the Project study area are included in the RWQCB's list of impaired waters, there is the potential for a negligible increase in drainage discharge into the Sacramento River, which is 303(d) listed for pesticides and heavy metals, due to increased impervious surfaces from the multi-use trail. Avoidance and Minimization Measures WQ-1 through WQ-5 would be implemented to minimize potential impacts to water quality.

Lastly, construction of the Project would necessitate temporary impacts of 0.01 acres of jurisdictional waters of the State to facilitate the installation of the multi-use trail bridge over an unnamed waterway. No permanent impacts to aquatic habitats are anticipated. The Project anticipates acquiring a non-notifying USACE Nationwide 14 permit and a RWQCB Section 401 Water Quality Certification prior to the start of construction. During final design, should temporary impacts to the open channel storm drainage feature be determined to "substantially adversely affect existing fish or wildlife resources" pursuant to the CFG Code 1602, a Section 1602 Streambed Alteration Agreement would also be acquired from the CDFW.

Short-Term Impacts During Construction

Construction-related earth-disturbing activities of the Build Alternative would introduce the potential for increased erosion and sedimentation, with subsequent effects on water quality. During site grading, trenching, and other construction activities, areas of bare soil would be exposed to erosive forces during rainfall events. Bare soils are much more likely to erode than vegetated areas because bare areas lack dispersion, infiltration, and retention properties covering vegetation provides. Absent actions to minimize erosion, the extent of the impacts would be dependent on soil erosion potential, type of construction practice, extent of disturbed area, timing of precipitation events, and topography and proximity to drainage channels. In addition, construction equipment and activities would have the potential to leak hazardous materials, such as oil and gasoline, and potentially affect surface water or groundwater quality. Improper use or accidental spills of fuels, oils, and other construction-related hazardous materials, such as pipe sealant, solvents, and paints, could also pose a threat to the water quality of local water bodies. These potential leaks or spills, if not contained, would be considered a potentially significant impact on ground and surface water quality. Without precautions to contain or capture sediments or accidental hazardous spills, construction activities could produce substantial pollutants in stormwater runoff and result in a significant impact on the existing surface water quality. The Build Alternative would implement WQ-1 through WQ-3 to minimize construction-related impacts.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: WQ-1 through WQ-3

No Project Alternative

The multi-use trail would not be constructed; therefore, no increase of paved surfaces would occur resulting in additional runoff. No ground disturbance would occur that would introduce the potential for increased erosion and sedimentation. The corridor would remain in its existing condition.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HYD-2: Potential to substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

Build Alternative

Due to the shallow depth of Project-related excavation, the Build Alternative is not expected to encounter groundwater; therefore, dewatering is not anticipated. No groundwater wells would be used for operation of the Build Alternative. Therefore, impacts related to groundwater supply would be less than significant.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur. The corridor would remain in its existing condition and there would be no impact to ground water.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HYD-3: Potential to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on-or off-site.

Build Alternative

Implementation of the Build Alternative will involve grading that has the potential to alter the existing topography of the Project site. However, the proposed grading and associated drainage facilities will be designed such that the existing drainage patterns are maintained and storm water runoff will continue to drain where it does now. The project will not alter the course of a stream or a river.

The Project would result in an increase of approximately 9.5 acres of paved surface area, which would contribute to an increase in the volume of storm water runoff from the multi-use trail surface. Storm water runoff from the project will be directed to infiltration and/or detention facilities as well as the City's storm drain system via new drainage facilities such as ditches and culverts. The proposed drainage facilities throughout the trail that would direct the water in such a way as to prevent flooding during storm events. Additionally, **WQ-1** through **WQ-3** would also be implemented to further control construction impacts due to additional runoff by incorporating and implementing the City's standards related to erosion control and grading activities.

Although the construction activities may have the potential to temporarily alter existing site drainage patterns within and immediately around the proposed trail corridor, these construction activities would be temporary, and the site would be regraded to appropriately drain stormwater. Mitigation measures **WQ-1** through **WQ-3** would also be implemented to further control construction impacts to erosion and runoff by incorporating and implementing the City's standards related to erosion control and grading activities. Therefore, the potential for the Build Alternative to substantially alter the existing drainage pattern or cause flooding of the site during construction is considered less than significant with mitigation.

Therefore, the overall potential for the Build Alternative to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would

result in substantial erosion or siltation or flooding on- or off-site during construction or operation would be considered less than significant with mitigation incorporated.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: WQ-1 through WQ-3

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur. The corridor would remain in its existing condition and there would be no impact to the existing drainage pattern of the corridor.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HYD-4: Potential to create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Build Alternative

The proposed multi-use trail would 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 City Bikeway Master Plan shows a continuous non-motorized trail system along the abandoned railway corridor. The Build Alternative would be not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff other than what was planned for in the General Plan and the City Bikeway Master Plan.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no additional runoff water would be generated other than what occurs in the existing environment.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HYD-5: Potential to otherwise substantially degrade water quality.

Build Alternative

Improper storage of hazardous materials on-site during construction could pose a risk of release of hazardous materials, thus contributing to the degradation of water quality. Section 2.7, Hazards and Hazardous Materials, provides further discussion on the hazardous materials that could be used during construction of the Build Alternative. In order to reduce the potential of hazards materials release, standard BMPs would be implemented which includes the development of a Spill Prevention and Contingency Plan. This Plan involves specific actions and procedures the contractor must implement in the event of a spill. This measure would reduce the potential for contamination of water supplies through runoff or ground water infiltration.

Additionally, inadvertent erosion that results in increased sediment in streams, or discharge of other materials into waterbodies, as a result of Project construction activities could result in adverse impacts to water quality. Mitigation measure **WQ-1** through **WQ-3** would be implemented during the construction phase to avoid and minimize potential adverse impacts to water quality from erosion and sedimentation.

Operation of the Build Alternative would not involve actions that could degrade water quality.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: WQ-1 through WQ-3

No Project Alternative

The multi-use trail would not be constructed; therefore, no ground disturbance would occur. The corridor would remain in its existing condition and no additional impacts to water quality would occur.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HYD-6: Potential to place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

Build Alternative

The Build Alternative would not entail construction of housing, and thus would not involve the placement of housing within the mapped 100-year flood hazard area. The Build Alternative would have a less than significant impact to the existing 100-year floodplain.

Level of Significance: Less Than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no potential impacts to 100-year flood hazard areas would occur.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HYD-7: Potential to place within a 100-year flood hazard area structures which would impede or redirect flood flows.

Build Alternative

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) show that the Project area is located primarily in Zone X, which is defined as an area of 0.2 percent chance of annual flood, areas of 1 percent annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 1 percent annual chance flood. The FIRMs for the Project area are shown in Appendix I. A CVFPB floodplain encroachment permit will be obtained prior to construction for activities that occur within the designated floodway. Consultation with SAFCA and Department of Water Resources will also occur throughout final design to coordinate the

timing of construction of the multi-use trail to occur after the planned levee improvements. The Build Alternative would replace an existing bridge over the open channel drainage feature south of Charlie Jensen Park; however, this bridge would be located in Zone X of the FEMA Flood Insurance Rate Maps and would not impede or redirect flood flows.

Level of Significance: Less Than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no potential impacts to 100-year flood hazard areas would occur.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HYD-8: Potential to expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

Build Alternative

Although the Project would replace an existing bridge over the open channel drainage feature south of Charlie Jensen Park, the bridge is located within Zone X of the FEMA Flood Insurance Rate Maps and thus would not expose people or structures to a significant risk of loss, injury, or death involving flooding. The Build Alternative area is located within an area that is protected from 100-year flows by levees, which means that if one of the levees or dams within the area were to fail, the Build Alternative could potentially be affected. However, the risk for the Build Alternative to expose people to risk involving flooding would be minimal, because the Build Alternative is a multi-use trail and would not be intended for permanent human habitation. Therefore, the potential for the Build Alternative to expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam is considered less than significant.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, there would be no potential to expose people or structures to flood events.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact HYD-9: Potential to cause inundation by seiche, tsunami, or mudflow.

Build Alternative

The Build Alternative's inland location negates the risk of a tsunami. According to the National Oceanic and Atmospheric Administration (NOAA), seiche's "occur in semi- or fully-enclosed bod(ies) of water [and] are typically caused when strong winds and rapid changes in atmospheric pressure push water from one end of a body of water to the other" (NOAA 2017). There are no large bodies of water capable of tsunamis or seiches located near the Build Alternative site. The Project site is approximately 80 miles

from a coastal region. Additionally, due to the relatively flat nature of the Build Alternative area, the likelihood of mudflow accruing in the area is unlikely. Therefore, there would be no potential for the Build Alternative to cause an inundation by seiche, tsunami, or mudflow.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, there would be no potential to expose people or structures to seiche, tsunami, or mudflow. Additionally, there are no large bodies of water capable of tsunamis or seiches located near the corridor.

Level of Significance: No Impact.

Required Mitigation: None Required.

Mitigation Measures

WQ-1: The Build Alternative will implement all feasible Low Impact Development (LID) BMPs and follow the Central Valley Region Phase I MS4 NPDES Permit (R5-2016-0040) for long-term, post-construction stormwater runoff.

WQ-2: The Build Alternative will require a National Pollution Discharge Elimination System (NPDES) General Construction Permit for discharges of storm water associated with construction activities (Construction General Permit 2012-0006-DWQ). As part of this permit requirement, a SWPPP shall be prepared prior to construction consistent with the requirements of the RWQCB. This SWPPP will incorporate all applicable BMPs to ensure that adequate measures are taken during construction to minimize impacts to water quality.

WQ-3: The SWPPP must include the following:

- Vehicle maintenance, staging and storing equipment, materials, fuels, lubricants, solvents, and other possible contaminants must be a minimum of 50 feet from surface waters. Any necessary equipment washing must occur where the water cannot flow into surface waters.
- The Project specifications will require the contractor to operate under an approved spill prevention and clean-up plan;
- Construction equipment will not be operated in flowing water;
- Construction work must be conducted according to site-specific construction plans that minimize the potential for sediment input to surface waters;
- Raw cement, concrete or concrete washings, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to aquatic life must be prevented from contaminating the soil or entering surface waters;
- Equipment used in and around surface waters must be in good working order and free of dripping or leaking contaminants; and,
- Any concrete rubble, asphalt, or other debris from construction must be taken to an approved disposal site.

2.9 LAND USE AND PLANNING

This section describes the regulatory and environmental setting for land use and planning. It also describes impacts to land use and planning that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal and State

There are no Federal or State requirements related to land use and planning that are applicable to the Build Alternative.

Local

City of Sacramento 2035 General Plan

The City of Sacramento 2035 General Plan updated in 2015 includes goals and policies that seek to promote sustainable growth and development practices, including pursuing opportunities to promote walking and biking in existing suburban neighborhoods through improvements such as introducing new pedestrian and bicycle connections. Other goals and policies focus on the creation of diverse neighborhoods that promote alternative modes of transportation and create a sense of place while integrating mixed uses and housing types for all socioeconomic levels. The 2035 General Plan seeks to create visually stimulating neighborhoods and corridors that center around pedestrian activity and promote socioeconomic growth identified in the 2035 General Plan.

The following goals and policies from the Land Use and Urban Design Element of the 2035 General Plan are applicable to the Project.

Goal LU 1.1 Growth and Change. Support sustainable growth and change through orderly and wellplanned development that provides for the needs of existing and future residents and businesses, ensures the effective and equitable provision of public services, and makes efficient use of land and infrastructure.

Policy LU 1.1.5 Infill Development. The City shall promote and provide incentives (e.g., focused infill planning, zoning/rezoning, revised regulations, provision of infrastructure) for infill development, redevelopment, mining reuse, and growth in existing urbanized areas to enhance community character, optimize City investments in infrastructure and community facilities, support increased transit use, promote pedestrian- and bicycle-friendly neighborhoods, increase housing diversity, ensure integrity of historic districts, and enhance retail viability.

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

Policy LU 2.6.1 Sustainable Development Patterns. The City shall promote compact development patterns, mixed use, and higher-development intensities that use land efficiently; reduce pollution and automobile dependence and the expenditure of energy and other resources; and facilitate walking, bicycling, and transit use. (RDR)

Goal LU 4.2 Suburban Neighborhoods. Encourage the creation of more complete and well-designed suburban neighborhoods that provide a variety of housing choices and mix of uses that encourage walking and biking.

Policy LU 4.2.1 Enhanced Walking and Biking. The City shall pursue opportunities to promote walking and biking in existing suburban neighborhoods through improvements such as:

- Introducing new pedestrian and bicycle connections.
- Adding bike lanes and designating and signing bike routes.
- Narrowing streets where they are overly wide.
- Introducing planting strips and street trees between the curb and sidewalk.
- Introducing traffic circles, speed humps, traffic tables, and other appropriate traffic-calming improvements.

Goal LU 5.3 Traditional Centers. Promote traditional centers where people can shop and socialize within walking distance of surrounding neighborhoods.

Policy LU 5.4.3 Connectivity to Regional Centers. The City shall require greater pedestrian and bicycle connections between mixed-use regional commercial centers and surrounding neighborhoods.

Goal LU 6.1 Corridors. Support the development of major circulation corridors that balance their vehicular function with a vibrant mix of uses that contribute to meeting local and citywide needs for retail, services, and housing and provide pedestrian-friendly environments that serve as gathering places for adjacent neighborhoods

Policy LU 6.1.8 Corridor Transit. The City shall require design and development along mixed-use corridors that promotes the use of public transit and pedestrian and bicycle travel and maximizes personal safety through development features such as: ■ Safe and convenient access for pedestrians between buildings and transit stops, parking areas, and other buildings and facilities ■ Roads designed for automobile use, efficient transit service as well as pedestrian and bicycle travel.

Goal LU 9.1 Open Space, Parks, and Recreation. Protect open space for its recreational, agricultural, safety, and environmental value and provide adequate parks and open space areas throughout the city.

Policy LU 9.1.1 Open Space Preservation. The City shall place a high priority on acquiring and preserving open space lands for recreation, habitat protection and enhancement, flood hazard management, public safety, water and agricultural resources protection, and overall community benefit.

City of Sacramento Bicycle Master Plan (2018)

The purpose of the Sacramento City Bicycle Master Plan is to establish bicycle-related investments, policies, programs and strategies to establish a complete bicycle system. This will encourage more bicycling by the citizens of Sacramento for both transportation and recreation, thereby allowing the City of Sacramento to meet General Plan emission targets. The Bicycle Master Plan was updated in 2018 to further engage under-represented neighborhoods, evaluate the equity related to bicycle infrastructure, and identify best practice bikeway designs to better connect the City's Low-stress bikeway network. The proposed Project is included within the 2018 Master Plan (see Figure 22).

Old Sacramento State Historic Park General Plan and FEIR (2014)

The Old Sacramento State Historic Park General Plan (OSSHP) Final EIR identifies planned recreational uses or facilities for the OSSHP corridor. The General Plan and 2014 FEIR specifically exclude the segment between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21); therefore, there are no planned recreational uses or facilities within the proposed Project area.

Environmental Setting

The following provides existing land uses on the Project site as well as the surrounding land use designations and zoning.

The Project site has been designated as Parks and Recreation, Public/Quasi Public, Suburban Center, Suburban Corridor, Suburban Neighborhood High Density, Suburban Neighborhood Low Density, Suburban Neighborhood Medium Density, and Traditional Neighborhood Low Density in the 2035 General Plan. The Project site is zoned A for Agricultural, C-1 Limited Commercial, C-2 General

Commercial, F Flood, M-1 Industrial, OB Office Building, R-1 Standard Single Family, R-2 Two-Family, R-3 Multi-Family, SC Shopping Center, and TC Transportation Corridor (see Figures 4 and 5).

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to land use. When an impact is determined to be significant, mitigation measures have been identified that would reduce or avoid that impact

Methodology for Analysis

According to the CEQA Environmental Checklist, the following thresholds of significance were established and were analyzed and evaluated to determine whether impacts to land use would be significant. Would the Build Alternative:

- Physically divide an established community;
- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives; however, the nature of the Project is a public infrastructure Project and once completed would not result in a change in the land use or zoning of the site.

Impact LAND-1: Potential to physically divide an established community.

Build Alternative

The Build Alternative consists of constructing 4.8 miles of Class 1 multi-use trail along the abandoned railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road. The existing adjacent communities would remain intact and as such, would not be divided. No acquisition of private property would occur as a result of the Build Alternative. Acquisition and temporary easements for construction of the trail would be obtained by the City prior to Project implementation.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, there would be no potential to physically divide an established community compared to the existing condition.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact LAND-2: Potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Build Alternative

The Project site is located in an urbanized portion of the community. The Build Alternative area for the multi-use trail is classified as Parks and Recreation in the City of Sacramento 2035 General Plan and zoning code. The Build Alternative is consistent with the City of Sacramento General Plan as the Build Alternative will be zoned for Parks and Recreation, and the Project would not change the zoning designation of adjacent areas. Because the Project does not create new connections to undeveloped land, no impacts to growth, economics, or affordable housing would occur. Development of the site as proposed would alter the existing landscape, but the Project site has been designated for recreation in the 2035 General Plan and the proposed development is consistent with these planning designations.

The intent of this trail is to provide north-south multi-modal connectivity for local and regional users. The new trail will also 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 City of Sacramento General Plan describes a transportation goal that states: "Create and maintain a safe, comprehensive, and integrated bicycle system and support facilities throughout the City that encourage bicycling that is accessible to all." Further the 2035 General Plan calls to "convert underused rights-of-way along travel lanes, drainage canals, and railroad corridors to bikeways wherever possible and desirable." The Build Alternative would meet the goals of the City of Sacramento General Plan and the City Bikeway Master Plan. Since the Build Alternative does not have the potential to conflict with land use plans as described above there would be no impact.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, the No Project Alternative would conflict with the 2018 City of Sacramento Bicycle Master Plan that includes a Class I bicycle facilities or pedestrian pathways within the Del Rio corridor.

Level of Significance: Less than significant.

Required Mitigation: None Required.

Impact LAND-3: Potential to conflict with any applicable habitat conservation plan or natural community conservation plan.

Build Alternative

The Build Alternative does not fall within the boundaries of any Habitat Conservation Plan as discussed in the Biological Resources Section 2.3. Additionally, there are no special status species or other species covered under a habitat conservation plan present within the Project area and the Build Alternative would not have a significant impact to biological resources (as discussed within Section 2.3). Therefore, the Build Alternative would not conflict with any habitat conservation plans in the region.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, the project corridor would remain in its existing condition. Additionally, there are no Habitat Conservation Plans within or adjacent to the corridor.

Level of Significance: Less than significant.

Required Mitigation: None Required.

Mitigation Measures

No mitigation required.

2.10 NOISE AND VIBRATION

This section describes the environmental and regulatory setting for noise. It also describes impacts on noise that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

This section discusses the local regulations, policies and objectives for noise and vibration. Particularly, the City of Sacramento 2035 General Plan policies that govern noise and vibrations are discussed below and are applicable to the Build Alternative.

Local

City of Sacramento 2035 General Plan

Construction noise is regulated by the City of Sacramento. Chapter 8.68 of the City of Sacramento Municipal Code contains application noise regulations within City limits:

Section 8.68.060 – Exterior Noise Standards

- a. The noise standards that apply to all agricultural and residential properties are:
 - 1. From seven a.m. to ten p.m. the exterior noise standard shall be fifty-five (55) dBA.
 - 2. From ten p.m. to seven a.m. the exterior noise standard shall be fifty (50) dBA.

Construction noise for the proposed Project is exempt under City Code Section 8.68.080 as long as there is compliance with the noise code requirements. Construction activity that occurs outside the exempt hours of the day (7am to 6pm from Monday through Saturday, and 9am to 6pm on Sundays) could result in noise that exceeds the 55-dBA daytime standard or 50-dBA nighttime standard. The contractor would be required to comply with the noise ordinance during construction activities. However, if construction activities generate noise in violation of the timeframes described above, the contractor will be required to obtain the proper variances as outlined in Sections 8.68.250 and 8.68.260.

Goal EC 3.1 Noise Reduction. Minimize noise impacts on human activity to ensure the health and safety of the community.

Policy EC 3.1.1 Exterior Noise Standards. The City shall require noise mitigation for all development where the Projected exterior noise levels exceed those shown in Table 17 below, to the extent feasible.

Table 17. Exterior Noise Compatibility Standards for Various Land Uses

Land Use Type	Highest Level of Noise Exposure That is Regarded as "Normally Acceptable"	
Residential- Low Density Single Family, Duplex, Mobile Homes	60 dBA	
Residential- Multi-family	65 dBA	
Transient Lodging- Motels, Hotels	65 dBA	
Schools, Libraries, Churches, Hospitals, Nursing Homes	70 dBA	
Auditoriums, Concert Halls, Amphitheaters	Mitigation Based on site-specific study	
Sports Arena, Outdoor Spectator Sports	Mitigation based on site-specific study	
Playgrounds, Neighborhood Parks	70 dBA	

Land Use Type	Highest Level of Noise Exposure That is Regarded as "Normally Acceptable"
Golf Courses, Riding stables, Water Recreation, Cemeteries	75 dBA
Office Buildings- Businesses, Commercial and Professional	70 dBA
Industrial, Manufacturing, Utilities, Agriculture	75 dBA

Table 17. Exterior Noise Compatibility Standards for Various Land Uses (Continued)

Source: (City of Sacramento 2009b)

Policy EC 3.1.2 Exterior Incremental Noise Standards. The City shall require noise mitigation for all development that increases existing noise levels by more than the allowable increment shown in Table 18, to the extent feasible.

	Residences and Buildings where people normally sleep		Institutional land uses with primarily daytime and evening uses	
Existing (Ldn)	Allowable Noise Increment	Existing Peak hour (Leq)	Allowable Noise Increment	
45	8	45	12	
50	5	50	9	
55	3	55	6	
60	2	60	5	
65	1	65	3	
70	1	70	3	
75	0	75	1	
80	0	80	0	

Table 18. Exterior Incremental Noise Impact Standards for Noise-Sensitive Uses (dBA)

Source: (City of Sacramento 2009b)

Policy EC 3.1.3 Interior Noise Standards. The City shall require new development to include noise mitigation to assure acceptable interior noise levels appropriate to the land use type: 45 dBA Ldn (Ldn = Day/Night Average Sound Level) for residential, transient lodgings, hospitals, nursing homes, and other uses where people normally sleep; and 45 dBA Leq (peak hour) for office buildings and similar uses.

Policy EC 3.1.4 Interior Noise Review for Multiple, Loud Short-Term Events. In cases where new development is proposed in areas subject to frequent, high-noise events, (such as aircraft overflights, or train and truck pass-bys), the City shall evaluate noise impacts on any sensitive receptors from such events when considering whether to approve the development proposal, taking into account potential for sleep disturbance, undue annoyance, and interruption in conversation, to ensure that the proposed development is compatible within the context of its surroundings.

Policy EC 3.1.5 Interior Vibration Standards. The City shall require construction Projects anticipated to generate a significant amount of vibration to ensure acceptable interior vibration levels at nearby residential and commercial uses based on the current City or Federal Transit Administration (FTA) criteria.

Policy EC 3.1.7 Vibration. The City shall require an assessment of the damage potential of vibrationinduced construction activities, highways, and rail lines in close proximity to historic buildings and archaeological sites and require all feasible mitigation measures be implemented to ensure no damage would occur.

Policy EC 3.1.9 Compatibility with Park and Recreation Uses. The City shall limit the hours of operation of parks and active recreation areas in residential areas to minimize disturbance to residences.

Policy EC 3.1.10 Construction Noise. The City shall require development Projects subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.

Environmental Setting

Noise is defined as unwanted sound. Sound levels usually are measured and expressed in decibels (dB), with 0 dB being the lowest threshold of hearing. Decibel levels range from 0 to 140: 50 dB for light traffic is considered a low decibel level, whereas 120 dB for a jet takeoff at 200 feet is considered a high decibel level.

Noise sources that contribute to ambient noise levels in and adjacent to the Project site include traffic from intersecting roadways and low amounts of noise from adjacent residential and recreational activities. Table 19 summarizes typical ambient noise levels based on population density.

Population Density	dBA, Ldn
Rural Suburban	40–50
Quiet suburban residential or small town	45–50
Normal suburban residential urban	50–55
Normal urban residential	60
Noisy urban residential	65
Very noisy urban residential	70
Downtown, major metropolis	75–80
Under flight path at major airport, 0.5 to 1 mile from runway	78–85
Adjoining freeway or near a major airport	80–90
Sources: Cowan 1984, Hoover and Keith 1996	

Table 19. Population Density and Associated Ambient Noise Levels

The vicinity of the Project area is most similar to that of "Normal suburban residential urban". Normal suburban residential uban areas have a typical noise level of 50-55 dBA. The Technical Noise Supplement (Caltrans, 2009) defines a noise receiver or receptor as "any natural or artificial sensor that can perceive, register or be affected by sound, such as a human ear, or a microphone."

Code of Federal Regulations (CFR) 23 CFR 772.5(h) defines a Type 1 Project as; "construction on new location or the physical alteration of an existing highway, which significantly changes either the horizontal or vertical alignment or increases the number of through-traffic lanes." The Build Alternative is a segment of 4.8-mile multiple-use trail that would provide connectivity between existing trails. As a result, the Project is not a Type 1 Project. Under the Caltrans Traffic Noise Analysis Protocol (CaTNAP), published in August 2006, Projects that are not Type 1 only require an evaluation of predicted construction noise. Therefore, only construction noise impacts are discussed.

The Project would take place within areas designated by the City of Sacramento General Plan for Parks and Recreation, Suburban Low and Medium Density, and Public land use. In general, noise sensitive land-uses include residences, schools, hospitals, churches, and parks. The Project would take place primarily near residences in suburbs, and construction activities would potentially occur within 50 feet from these residences.

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to noise. When an impact is determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

Methodology for Analysis

Available documentation related to the existing noise environment and sensitive receptors applicable in the Build Alternative area, including previous environmental documents prepared for projects in the area, were reviewed to evaluate potential noise impacts. Further, regulatory information, including general plans of local agencies, was reviewed to address site-specific concerns about these impacts from the Build Alternative.

Using the CEQA Environmental Checklist for guidance the following thresholds of significance for evaluating potential impacts were established. These thresholds are evaluated in in the following sections to determine whether potential public service impacts from the Build Alternative on the baseline setting would be significant.

A potential impact would be significant if the Build Alternative would:

- Expose persons to or generation of sustained noise levels above ambient noise conditions that could result in interference with speech or sleep;
- Expose persons to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project;
- A substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project;
- For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip, a Project that would expose people residing or working in the Project area to excessive noise levels.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact NOS-1: Potential to expose persons to or generation of sustained noise levels above ambient noise conditions that could result in interference with speech or sleep.

Build Alternative

To measure construction noise it is necessary to consider both the context of construction activities and the kinds of construction equipment anticipated to be used. A wide variety of activities would occur during construction of the Project, including the following:

- 1) Grading/Earthwork Preparation (Dump Truck, Excavator, Compactor, Front End Loader, Grader)
- 2) Paving (Dump Truck, Paver, Roller, Tractor)

Table 20 summarizes noise levels typically produced by construction equipment commonly used on roadway construction Projects.

	Impact	Acoustical Use Factor		Actual Measured	No. of Actual Data
Equipment Description	Device ?			(dBA, slow)	(Count)
		(,,,)			
All Other Equipment > 5 HP	No	50	85 (S	amples average N/A	0
	No	20	85		36
Auger Drill Rig				84 78	
Backhoe	No	40	80	78 N/ A	372
Bar Bender	No	20	80	N/A	0
Blasting	Yes	N/A	94	N/A	0
Boring Jack Power Unit	No	50	80	83	1
Chain Saw	No	20	85	84	46
Clam Shovel (dropping)	Yes	20	93	87	4
Compactor (ground)	No	20	80	83	57
Compressor (air)	No	40	80	78	18
Concrete Batch Plant	No	15	83	N/A	0
Concrete Mixer Truck	No	40	85	79	40
Concrete Pump Truck	No	20	82	81	30
Concrete Saw	No	$\frac{1}{20}$	90	90	55
Crane	No	16	85	81	405
Dozer	No	40	85	82	55
Drill Rig Truck	No	20	83 84	82 79	22
Drum Mixer	No	50	80	80	1
Dump Truck	No	40	84	76	31
Excavator	No	40	85	81	170
Flat Bed Truck	No	40	84	74	4
Front End Loader	No	40	80	79	96
Generator	No	50	82	81	19
Generator (<25KVA, VMS	No	50	70	73	74
Gradall	No	40	85	83	70
Grader	No	40	85	N/A	0
Grapple (on backhoe)	No	40	85	87	1
Horizontal Boring Hvdr. Jack	No	25	80	82	6
Hydra Break Ram	Yes	10	90	N/A	ŏ
Impact Pile Driver	Yes	20	95	101	11
Jackhammer	Yes	20	85	89	133
Man Lift	No	20	85	75	23
Mounted Impact Hammer (hoe	Yes	20	90	90	212
Pavement Scarafier	No	20	85	90	2
Paver	No	50	85	77	9
Pickup Truck	No	40	55	75	1
Pneumatic Tools	No	50	85	85	90
Pumps	No	50	77	81	17
Refrigerator Unit	No	100	82	73	3
Rivit Buster/chipping gun	Yes	20	85	79	19
Rock Drill	No	20	85	81	3
Roller	No	20	85	80	16
Sand Blasting (Single Nozzle)	No	20	85	96	9
Scraper	No	$\frac{20}{40}$	85	84	12
Shears (on backhoe)	No	40	85	96	5
	No	100	83 78	90 78	1
Slurry Plant					
Slurry Trenching Machine	No	50	82	80 NI/A	75
Soil Mix Drill Rig	No	50	80	N/A	0
Fractor	No	40	84	N/A	0
Vacuum Excavator (Vac-truck)	No	40	85	85	149
Vacuum Street Sweeper	No	10	80	82	19
Ventilation Fan	No	100	85	79	13
Vibrating Hopper	No	50	85	87	1
	No	20	80	80	-

Table 20. Construction Equipment Noise Emissions and Acoustical Usage Factors Database

Taken from Roadway Construction Noise Model User's Guide (FHWA 2006b)

Construction equipment is expected to generate noise levels ranging from 50 to 85 dB at a distance of 50 feet and noise produced by construction equipment would be reduced over distance at a rate of about 6 dB per doubling of distance. Construction noise would be intermittent, and noise levels would vary depending on the type of construction activity. The loudest construction activities would include engine noise from construction vehicles, and excavation. For this Project, the lowest construction equipment-related noise levels would be 50 dBA at a distance of 50 feet for sound from a pick-up truck. The highest noise levels would be up to 85 dBA (at a distance of 50 feet) from operation of the excavator or dozer.

The nearest sensitive receptors that would be most affected by construction noise impacts are singlefamily residences located within 50 feet of the Project footprint; however, construction noise impacts to sensitive receptors would be minimal, short term, intermittent, and would occur during daytime construction hours pursuant to the City of Sacramento Noise Ordinance. No pile driving or other more intensive noise generation is expected to occur. It is not anticipated that construction work would need to occur outside of established daytime hours; however, should the City determine that night work is necessary, a variance would be obtained and adjacent property owners would be notified. These impacts would be reduced with the inclusion of best management practices and measure NOI-1.

Level of Significance: Less than Significant With Mitigation Incorporated

Mitigation Required: NOI-1

No Project Alternative

No construction; therefore, people would not be exposed to sustained noise levels other that what occurs within the existing environment.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact NOS-2: Potential to expose persons to or generate excessive groundborne vibration or groundborne noise levels.

Build Alternative

Construction activities associated with the Build Alternative may also result in ground vibration. Table 21 shows examples of the amount of vibration generated from the types of construction equipment close to a sensitive receptor in terms of Peak Particle Velocity (PPV) at a range of 25 feet.

Equipment	PPV at 50 ft (in/sec)
Vibratory Roller	0.08
Hoe Ram	0.031
Large Bulldozer	0.031
Caisson drilling	0.031
Loaded trucks	0.027
Jackhammer	0.012
Small bulldozer	0.003

Source: Federal Transit Administration, 2006. See also:

http://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook09.cfm

Vibration can impact sensitive receptors by causing damage to a structure or by causing annoyance based on human perception. The threshold at which there is a risk of damage to older buildings is 0.3 PPV (in/sec) (Caltrans, 2013). As shown in Table 21 above, none of the activities that would take place

during construction have the potential to reach 0.3 PPV (in/sec) to the nearest residence 50 feet away; therefore, no potential for damage would occur.

Construction activities that would take place at least 50 feet from the sensitive receptor would range from Barely Perceptible to Distinctly Perceptible, depending on the distance and intensity of vibration generation. Table 22 outlines the amount of PPV that would potentially cause annoyance to human perception. Vibration from construction activity is typically below the threshold of perception when the activity is more than about 50 feet from the receiver. Considering the low intensity of vibration and the short-term nature of the construction activities near affected sensitive receptors, this impact is not considered substantial and would not require additional minimization measures beyond those outlined below.

	Maximum PPV (in/sec)		
Human Response	Transient Sources	Continuous/Frequent	
		intermittent Sources	
Barely Perceptible	0.04	0.01	
Distinctly Perceptible	0.25	0.04	
Strongly Perceptible	0.9	0.10	
Severe	2.0	0.40	

Table 22. Guideline Vibration Annoyance Potential Criteria

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans Transportation- and Construction-Induced Vibration Guidance Manual (Caltrans 2004)

Significance: Less than Significant With Mitigation

Mitigation Required: NOI-1

No Project Alternative

The multi-use trail would not be constructed; therefore, people would not be exposed to groundbourne vibration from construction equipment.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact NOS-3: Potential to cause a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Build Alternative

Operation of the Build Alternative may introduce noise associated with the multi-use trail generated from recreational activities and pedestrians. The closest sensitive receptors that would be potentially exposed to operational noise from the Build Alternative are residential uses approximately 50 feet away. Trail-related noise impacts experienced by adjacent residences would not be considered a substantial increase in noise levels. Therefore, the Project would not generate a significant increase in long-term operational noise within the Project area.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, ambient noise levels would remain the same as the existing condition.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact NOS-4: Potential to cause a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Build Alternative

To measure construction noise it is necessary to consider both the context of construction activities and the kinds of construction equipment forecast to be used. A wide variety of construction activities would occur during the Project improvement process and would include the following:

- 3) Grading/Earthwork Preparation (Dump Truck, Excavator, Compactor, Front End Loader, Grader)
- 4) Paving (Dump Truck, Paver, Roller, Tractor)

Table 20 shown in Impact NOS-1 summarizes noise levels typically produced by construction equipment commonly used on roadway construction Projects. Construction equipment is expected to generate noise levels ranging from 50 to 85 dB at a distance of 50 feet, and noise produced by construction equipment would be reduced over distance at a rate of about 6 dB per doubling of distance. Construction noise would be intermittent, and noise levels would vary depending on the type of construction activity. The loudest construction activities would include engine noise from construction vehicles, and excavation. For this Project, the lowest construction equipment-related noise levels would be 50 dBA at a distance of 50 feet for sound from a pick-up truck. The highest noise levels would be up to 85 dBA (at a distance of 50 feet) from operation of the excavator or dozer.

The nearest sensitive receptors that would be most affected by construction noise impacts are singlefamily residences located within 50 feet of the Project footprint. Activities would be generally less intensive noise generating activities. No pile driving or other more intensive noise generation is expected to occur.

Construction noise impacts to sensitive receptors would be minimal, short term, intermittent, and would occur during daytime construction hours pursuant to the City of Sacramento Noise Ordinance. It is not anticipated that construction work would need to occur outside of established daytime hours; however, should the City determine that night work is necessary, a variance would be obtained. These impacts would be reduced with the inclusion of best management practices and the minimization measure **NOI-1**.

Level of Significance: Less than Significant With Mitigation

Mitigation Required: NOI-1

No Project Alternative

The multi-use trail would not be constructed; therefore, ambient noise levels would remain the same as the existing condition.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact NOS-5: Potential for a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip would the Project expose people residing or working in the Project area to excessive noise levels.

Build Alternative

The proposed trail is located approximately 0.30 mile west of Sacramento Executive Airport; however, the Build Alternative is a multi-use trail and would not be intended for permanent human habitation. Therefore, the potential for the Build Alternative to expose people to a new source of permanent noise is considered less than significant.

Level of Significance: Less Than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, ambient noise levels would remain the same as the existing condition.

Level of Significance: No impact.

Required Mitigation: None Required.

Mitigation Measures

NOI-1: The following noise control measures will be incorporated into the contract documents for construction of the Project:

- Construction activity that occurs outside the exempt hours of the day (7am to 6pm from Monday through Saturday, and 9am to 6pm on Sundays) that exceeds the 50-dBA daytime standard or 45-dBA nighttime standard must obtain the proper variances as outlined in Sections 8.68.250 and 8.68.260 of the City of Sacramento Noise Ordinance.
- Construction equipment and vehicles should be equipped with properly operating mufflers according to the manufacturers' recommendations. Air compressors and pneumatic equipment should be equipped with the manufacturer-recommended muffler, and tools should be equipped with shrouds or shields. An internal combustion engine will not be operated on the job site without the appropriate muffler.
- The use of loud sound signals shall be avoided in favor of light warnings except those required by safety laws for the protection of personnel.

2.11 POPULATION AND HOUSING

This section describes the regulatory and environmental setting for population and housing. It also describes impacts that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

CEQA requires the analysis of a Project's potential to induce growth. CEQA guidelines, Section 15126.2(d), require that environmental documents "...discuss the ways in which the Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment..."

Additionally, Federal and state laws (the URA, also known as the Uniform Relocation Act or just Uniform Act, and California Government Code, Chapter 16, Section 7260, et seq.) require that relocation assistance be provided to any person, business, farm, or nonprofit operation relocated because of the acquisition of real property by a public entity for public use.

City of Sacramento 2035 General Plan

The following goals and policies from the City of Sacramento 2035 General Plan Land Use and Economic Development element are applicable to the Build Alternative.

Goal ED 1.1 Maintain a supportive business climate that increases the City's ability to retain and expand existing businesses and attract businesses

Policy ED 1.1.1 Economic Development Strategy. The City shall maintain and implement the Economic Development Strategy to identify priorities, support prosperity, and improve long-term fiscal competitiveness.

Policy ED 1.1.2 City Image. The City shall continue to promote Sacramento among its citizens and the wider business community as a livable community and an excellent place to do business.

Goal LU 1.1 Growth and Change. Support sustainable growth and change through orderly and wellplanned development that provides for the needs of existing and future residents and businesses, ensures the effective and equitable provision of public services, and makes efficient use of land and infrastructure.

Policy LU 1.1.9 New Growth. The City shall continue to plan for future expansion and new growth in Special Study Areas to ensure that regional growth is adequately accommodated and served by the City, particularly when it cannot be absorbed in infill areas.

Goal ERC 2.1 Integrated Parks and Recreation System. Provide an integrated system of parks, open space areas, and recreational facilities that are safe and connect the diverse communities of Sacramento.

Policy ERC 2.1.1 Complete System. The City shall develop and maintain a complete system of parks and open space areas throughout Sacramento that provide opportunities for both passive and active recreation.

Policy ERC 2.1.2 Connected Network. The City shall connect all parts of Sacramento through integration of recreation and community facilities with other public spaces and rights-of-way (e.g., buffers, medians, bikeways, sidewalks, trails, bridges, and transit routes) that are easily accessible by alternative modes of transportation.

Goal ERC 2.2 Parks, Community and Recreation Facilities and Services. Plan and develop parks, community and recreation facilities, and services that enhance community livability; improve public health

and safety; are equitably distributed throughout the city; and are responsive to the needs and interests of residents, employees, and visitors.

Policy ERC 2.2.2 Timing of Services. The City shall ensure that the development of parks and community and recreation facilities and services keeps pace with development and growth within the city.

Environmental Impacts

This section analyzes the proposed alternatives potential to result in significant impacts to population and housing. When an impact is determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

Methodology for Analysis

Using the CEQA Environmental Checklist for guidance the following thresholds of significance for evaluating potential impacts were established. These thresholds are evaluated in the following sections to determine whether potential population and housing impacts from the Build Alternative on the baseline setting would be significant. A potential impact would be significant if the Build Alternative would:

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; or
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact POP-1: Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

Build Alternative

The Project would not create new connections to undeveloped land; therefore, no impacts to growth, economics, or affordable housing are anticipated to occur. 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. The Project would result in improved accessibility for surrounding communities. Development of the site as proposed would alter the existing landscape, but the Project site would continue to be consistent with the planning designations in the 2035 General Plan.

Level of Significance: No impact.

Mitigation Required: None Required.

No Project Alternative

The multi-use trail would not be constructed; therefore, there is no potential to induce substantial population growth in the area other than what is anticipated in the City of Sacramento General Plan.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact POP-2: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.

Build Alternative

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.

APN	OWNER
017-0010-051-0000	CITY OF SACRAMENTO
017-0020-006-0000	CITY OF SACRAMENTO
017-0020-012-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
031-0200-010-0000	STATE OF CALIFORNIA
017-0010-019-0000	CITY OF SACRAMENTO
017-0020-005-0000	CITY OF SACRAMENTO
035-0010-010-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
035-0010-045-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
031-0010-006-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
031-0010-009-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
017-0010-034-0000	CITY OF SACRAMENTO
017-0010-049-0000	CITY OF SACRAMENTO
017-0020-018-0000	SOUTHERN PACIFIC TRANSPORTATION
017-0010-025-0000	CITY OF SACRAMENTO
017-0010-028-0000	CITY OF SACRAMENTO
017-0020-007-0000	CITY OF SACRAMENTO
017-0020-010-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
017-0020-016-0000	CITY OF SACRAMENTO
017-0020-015-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
017-0020-013-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
017-0020-014-0000	CITY OF SACRAMENTO
035-0380-015-0000	CITY OF SACRAMENTO
035-0010-053-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT
035-0010-055-0000	CITY OF SACRAMENTO
031-0010-007-0000	SACRAMENTO REGIONAL TRANSIT DISTRICT

Table 23. Potential Project Right of Way

031-0010-004-0000	CITY OF SACRAMENTO
031-0010-010-0000	STATE OF CALIFORNIA
031-0010-003-0000	CITY OF SACRAMENTO
035-0010-054-0000	CITY OF SACRAMENTO
017-0010-031-0000	CITY OF SACRAMENTO

Source: ParcelQuest. *Data in this table is based on preliminary review of the ROW impacts for the Build Alternative. This information will be updated upon final design.

No acquisition of private property would occur as a result of the Build Alternative. Acquisition and temporary easements for construction of the trail would be obtained by the City prior to Project implementation.

Level of Significance: No Impact.

Mitigation Required: None Required.

No Project Alternative

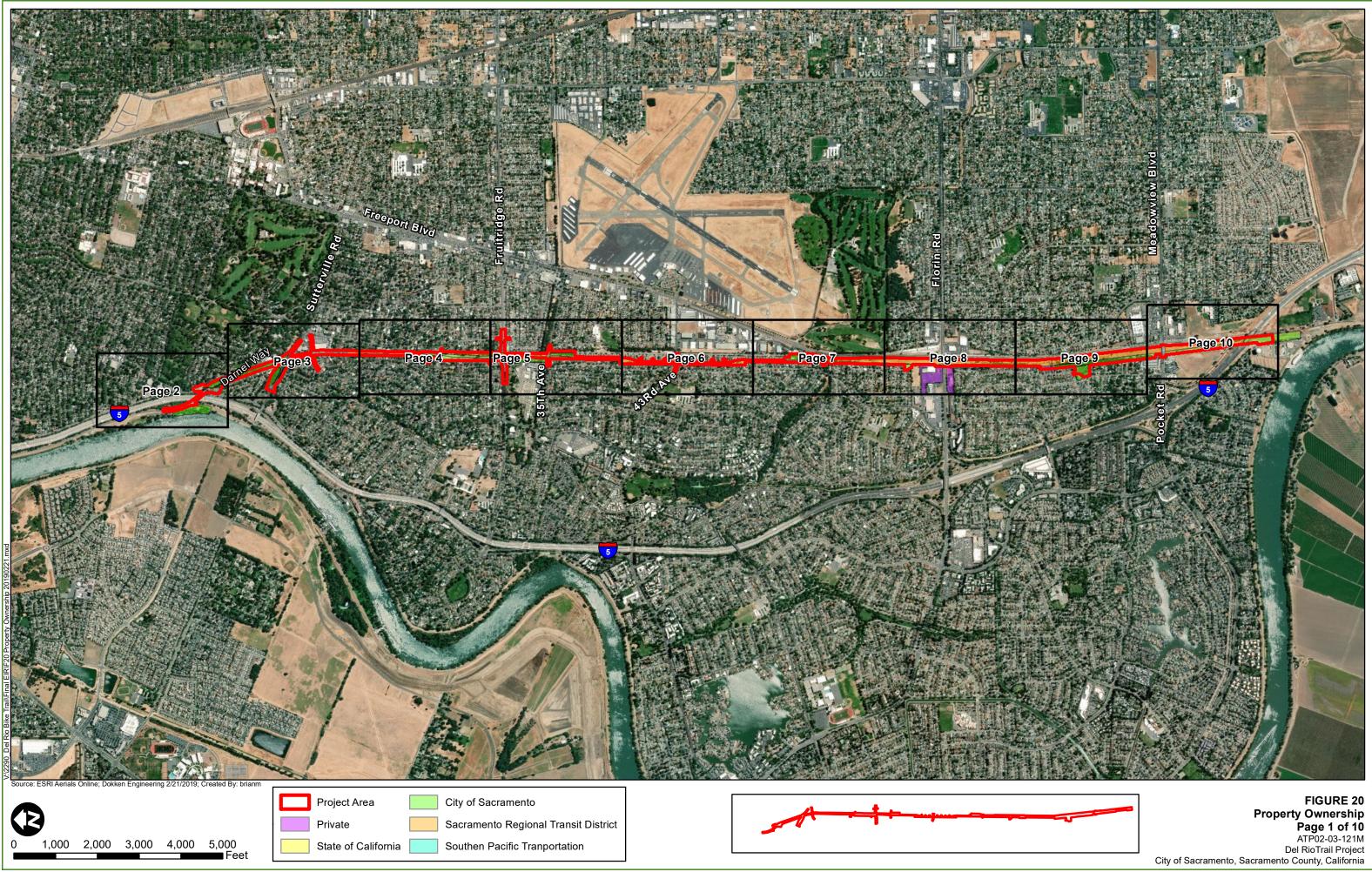
The multi-use trail would not be constructed; therefore, there is no potential to displace existing housing.

Level of Significance: No impact.

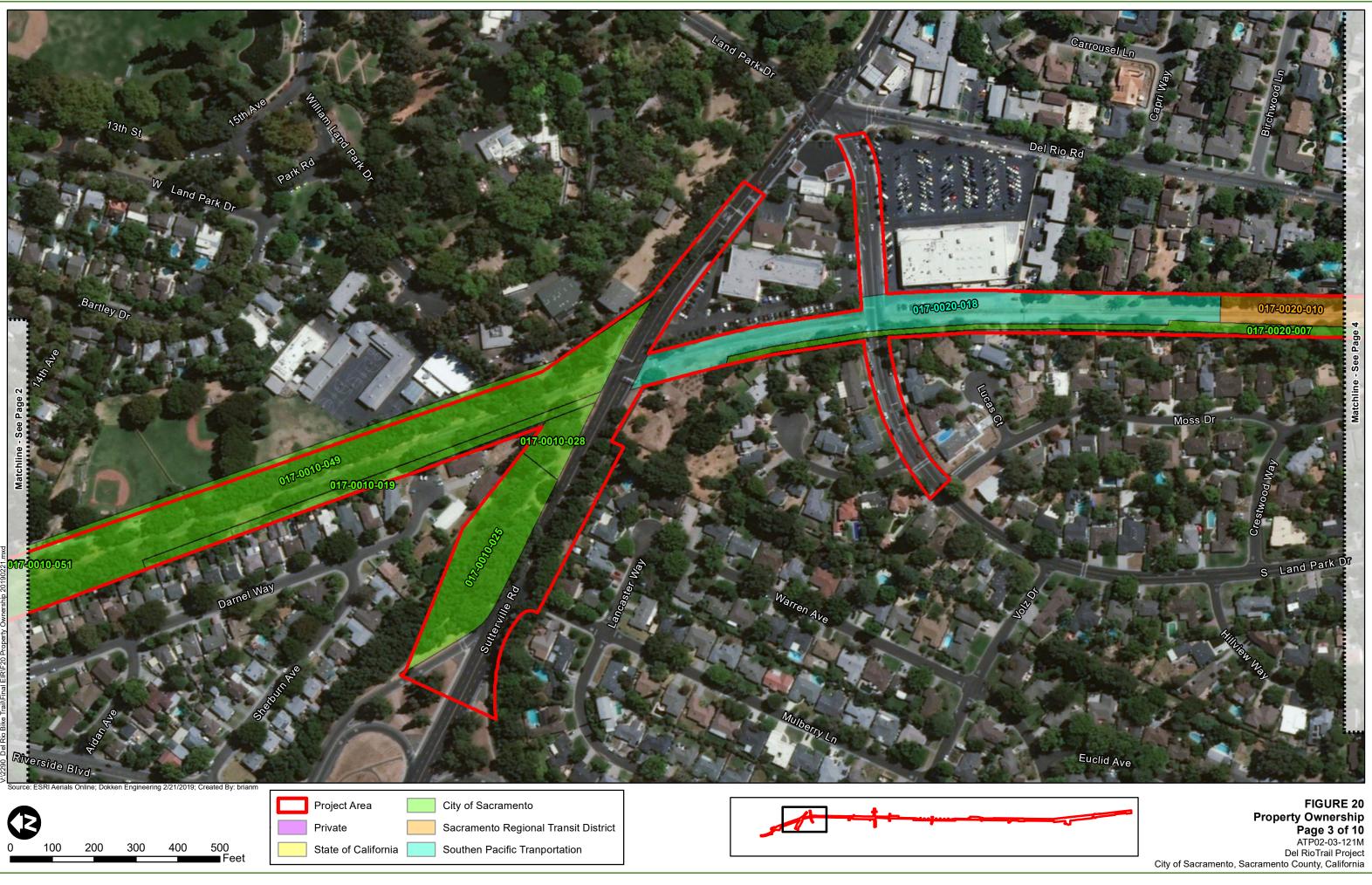
Required Mitigation: None Required.

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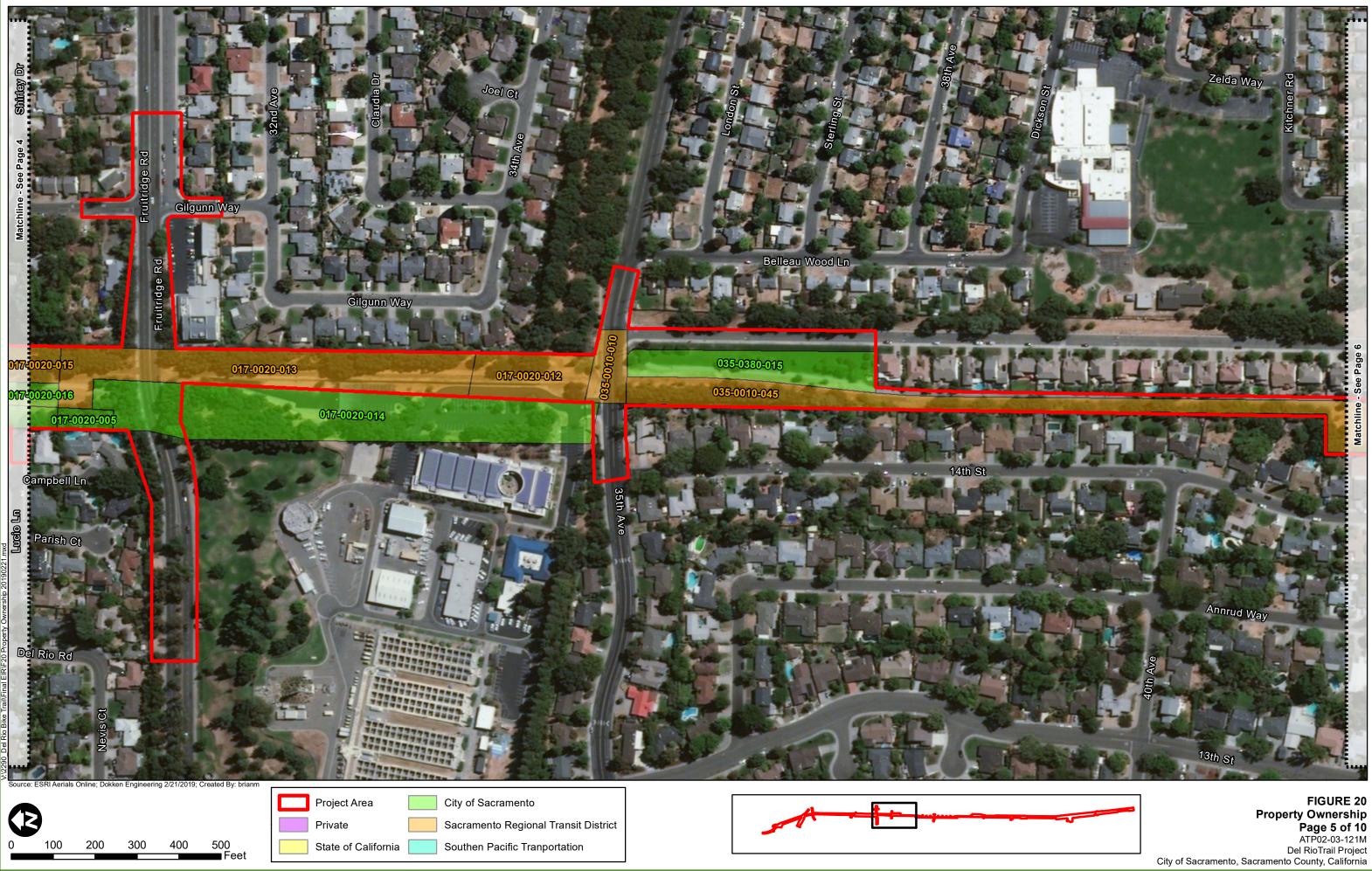


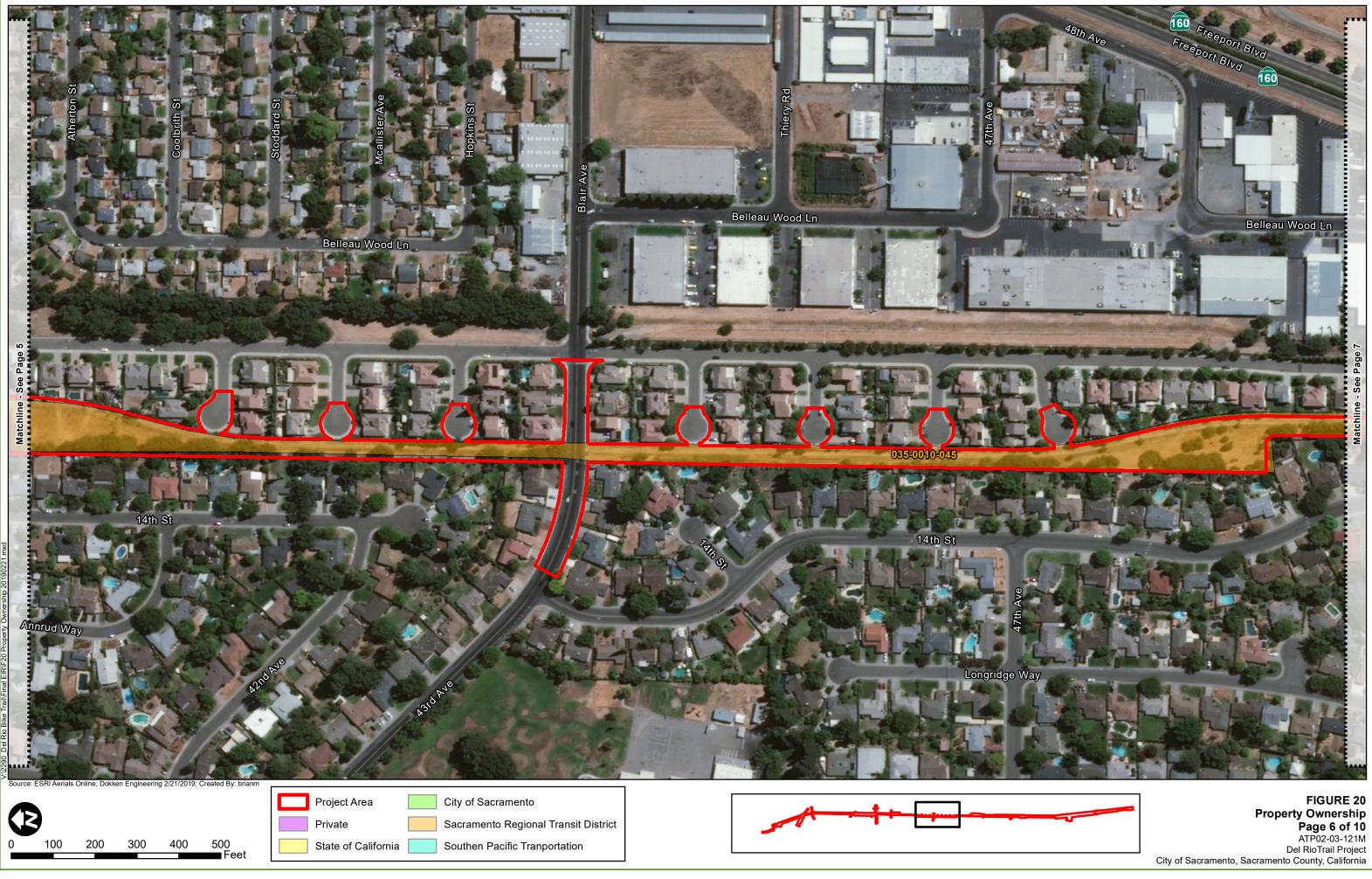






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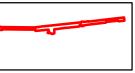




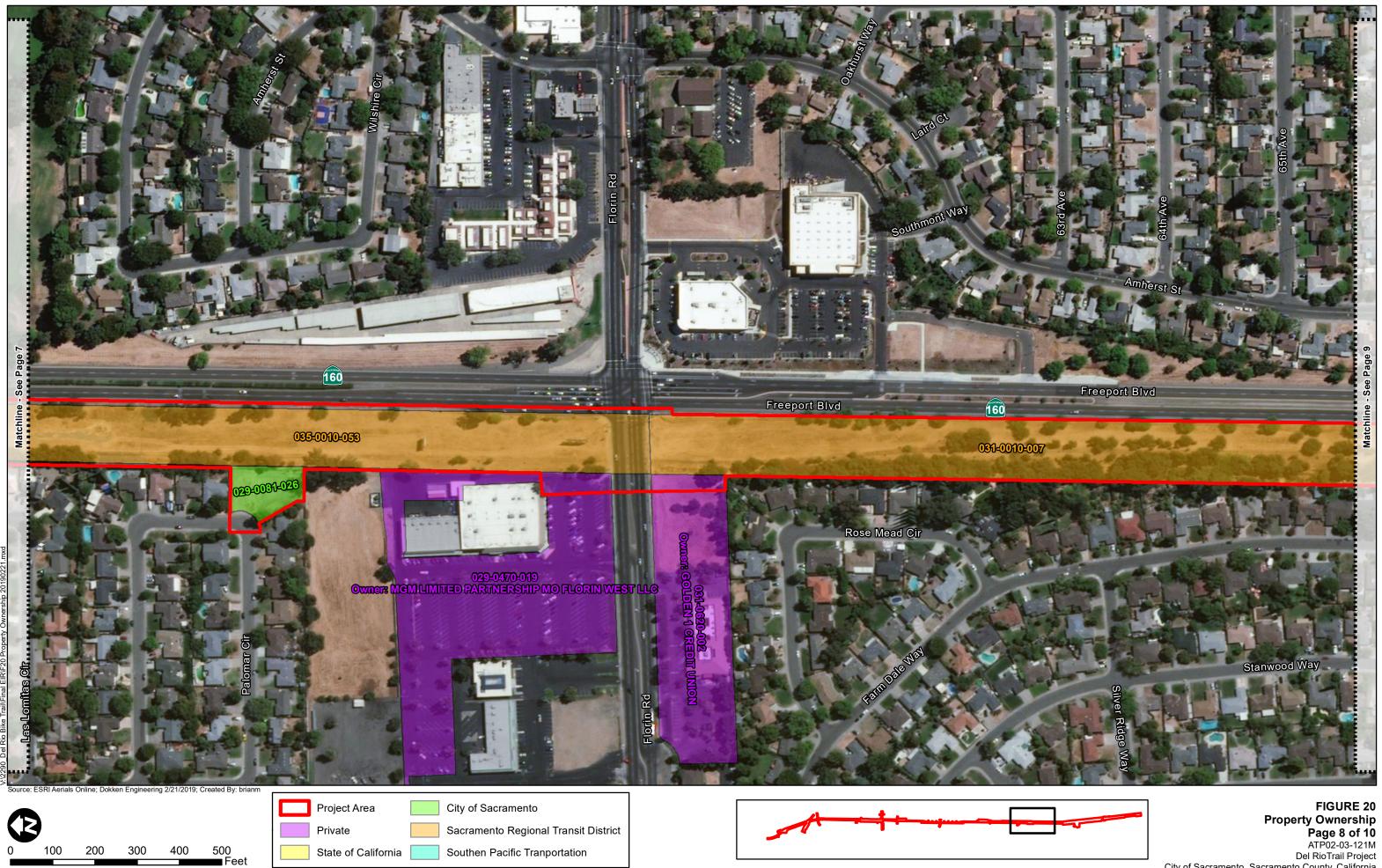
Sacramento Regional Transit District

Southen Pacific Tranportation

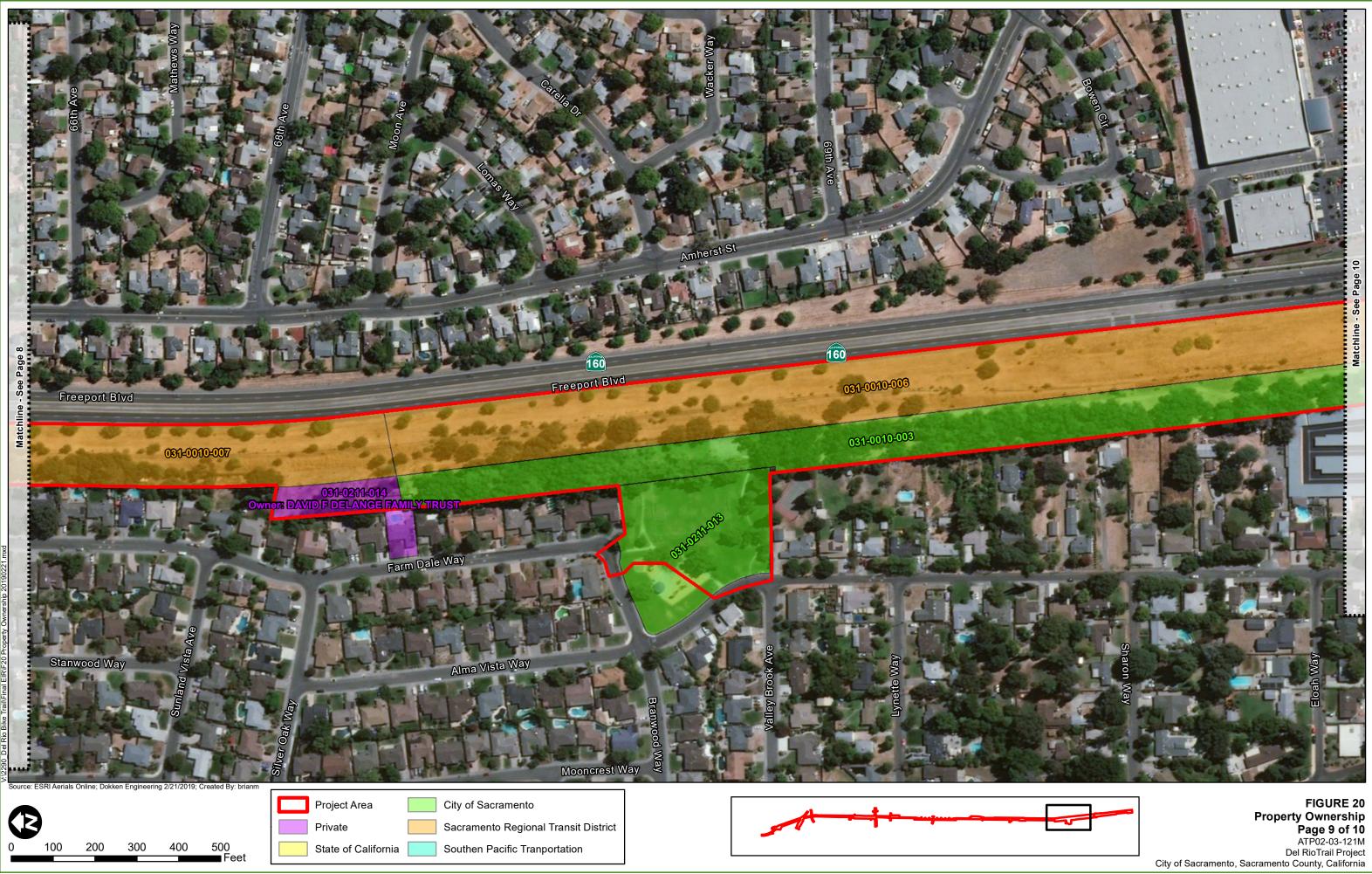


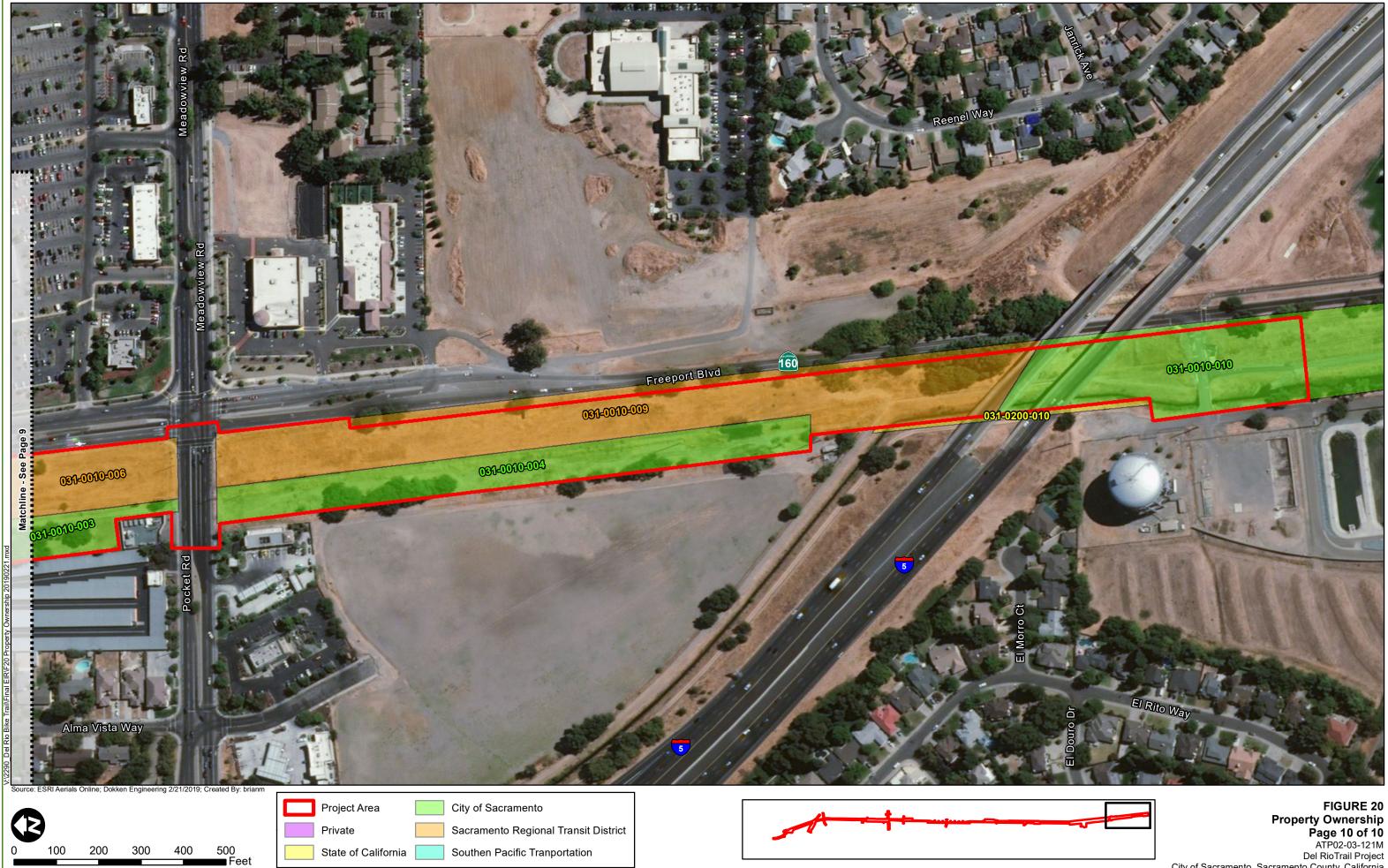


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Impact POP-3: Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Build Alternative

As discussed above, no acquisition of private property would occur as a result of the Build Alternative. Acquisition and temporary easements for construction of the trail are anticipated to be needed from Regional Transit and the State. These would be obtained by the City prior to Project implementation.

Level of Significance: No Impact.

Mitigation Required: None Required.

No Project Alternative

The multi-use trail would not be constructed; therefore, there is no potential to displace a substantial number of people.

Level of Significance: No impact.

Required Mitigation: None Required.

Mitigation Measures

None Required.

2.12 PUBLIC SERVICES

This section describes the regulatory and environmental setting for public services. It also describes impacts on public services that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

City of Sacramento 2035 General Plan

The following goals and policies from the City of Sacramento 2035 General Plan, Public Health and Safety (PHS), and Education, Recreation, and Culture (ERC), are applicable to the Build Alternative.

Goal PHS 1.1 Crime and Law Enforcement. Work cooperatively with the community, regional law enforcement agencies, local government and other entities to provide quality police service that protects the long-term health, safety and well-being of our city, reduce current and future criminal activity, and incorporate design strategies into new development.

Policy PHS 1.1.2: Response Time Standards. The City shall strive to achieve and maintain optimal response times for all call priority levels to provide adequate police services for the safety of all city residents and visitors.

Policy PHS 2.1.2 Response Time Standards. The City shall strive to maintain appropriate emergency response times to provide optimum fire protection and emergency medical services to the community.

Policy PHS 2.2.4 Water Supplied for Fire Suppression. The City shall ensure that adequate water supplies are available for fire suppression throughout the city and shall require development to construct all necessary fire suppression infrastructure and equipment.

Goal ERC 2.1 Integrated Parks and Recreation System. Provide an integrated system of parks, open space areas, and recreational facilities that are safe and connect the diverse communities of Sacramento.

Policy ERC 2.1.1 Complete System. The City shall develop and maintain a complete system of parks and open space areas throughout Sacramento that provide opportunities for both passive and active recreation.

Policy ERC 2.1.2 Connected Network. The City shall connect all parts of Sacramento through integration of recreation and community facilities with other public spaces and rights-of-way (e.g., buffers, medians, bikeways, sidewalks, trails, bridges, and transit routes) that are easily accessible by alternative modes of transportation.

Goal ERC 2.2 Parks, Community and Recreation Facilities and Services. Plan and develop parks, community and recreation facilities, and services that enhance community livability; improve public health and safety; are equitably distributed throughout the city; and are responsive to the needs and interests of residents, employees, and visitors.

Policy ERC 2.2.2 Timing of Services. The City shall ensure that the development of parks and community and recreation facilities and services keeps pace with development and growth within the city.

Environmental Setting

Fire

The City of Sacramento provides fire protection services to the Project area. The Project would be served by the Fire Department Headquarters located at 5770 Freeport Boulevard and Sacramento Fire Station #11 located at 785 Florin Road. Fire stations are located so as to provide a maximum effective service radius of two miles (SGPU DEIR, M-1). This service radius virtually assures blanket coverage of the City. Typical response time to fire calls is four minutes (SGPU DEIR, M-1).

Police

The Sacramento Police Department provides police protection service for the Project area. It is located approximately 0.30 mile from the center of the Project area at 5770 Freeport Boulevard.

School District

The Build Alternative site is within the Sacramento City Unified School District. Five schools (Learning Tree Preschool, Alice Birney Elementary, Pony Express Elementary, New Technology High School, and Sutterville Preschool) are located adjacent to the study area.

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to public services. When an impact is determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

Methodology for Analysis

Using the CEQA Environmental Checklist for guidance the following thresholds of significance for evaluating potential impacts were established. These thresholds are evaluated in the following sections to determine whether potential public service impacts from the Build Alternative on the baseline setting would be significant. A potential impact would be significant if the Build Alternative would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
 - Fire protection;
 - Police protection;
 - Schools;
 - Parks; or
 - Other public facilities

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact PUB-1: Potential to result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Fire protection;
- Police protection;
- Schools;
- Parks; or
- Other public facilities

Build Alternative

The Project would not result in the need for new public services beyond what was anticipated in the 2035 General Plan. The Project does not propose new housing or commercial development requiring additional school facilities, police, and/or fire services. No short-term or long-term impacts to fire protection, police

protection, school facilities, or other governmental services would occur as a result of Build Alternative. Additionally, the multi-modal trail would create a more efficient access route to public services throughout the community.

The existing police and fire stations have a capacity to serve any Project-related needs that may arise. Paving the abandoned railroad corridor to create a formalized trail would not subject the Build Alternative area to increased fire hazards. Short-term traffic operations at intersections would be temporarily affected during construction of the trail crossing; however, one lane in each direction would be kept open for through traffic throughout construction. Short-term construction impacts to traffic operations are anticipated to be minimal. Temporary impacts to traffic flow as a result of construction activities would be minimized through construction phasing and signage and a traffic control plan (**TRA-1**).

Level of Significance: Less than Significant with Mitigation Incorporated

Mitigation Required: TRA-1 and TRA-2

No Project Alternative

The multi-use trail would not be constructed; therefore, public services and emergency response would remain the same.

Level of Significance: No impact.

Required Mitigation: None Required.

Mitigation Measures

See TRA-1 and TRA-2 in Section 2.14.

2.13 RECREATION

This section describes the regulatory and environmental setting for recreation. It also describes impacts to recreation that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal

Section 4(f) of the U.S. Department of Transportation (USDOT) Act of 1966 prohibits the Federal Transit Association and other USDOT agencies from using land from publicly owned parks, recreation areas (including recreational trails), wildlife and water fowl refuges, or public and private historic properties, unless there is no feasible and prudent alternative to that use and the action includes all possible planning to minimize harm to the property resulting from such a use. The Build Alternative is partially funded using Caltrans Active Transportation Program funds; therefore, responsibility for compliance with Section 4(f) has been assigned to Caltrans pursuant to 23 USC 326 and 327, including determinations and approval of Section 4(f) evaluations, as well as coordination with those agencies that have jurisdiction over a Section 4(f) resource that may be affected by a Project action. The Build Alternative was determined to be consistent with Section 4(f). The full technical study is available for review at the City of Sacramento Community Development Center and on the Project website at:

http://www.cityofsacramento.org/Public-Works/Engineering-Services/Projects/Current-Projects/Del-Rio-Trail

State

California Government Code Section 65560(b)

California Government Code section 65560(b) defines "open space land" as any parcel or area of land or water that is unimproved and devoted to an open space use. State law requires that the local general plans include an Open Space element to promote the retention of open space for recreational purposes.

California's Recreation Policy

The 2005 California Recreation Policy provides a comprehensive set of policies for many types of recreation activities ranging from active to passive, indoors to outdoors, on land and water, in facilities, and in programs and support functions (California State Parks 2005). This policy addresses five separate areas of recreation including adequacy of recreation, leadership, health, preservation, and accessibility. The following policy objectives are relevant to the Build Alternative:

- 1. <u>Adequacy of recreation opportunities:</u> The supply of parklands, water, open space, recreation facilities, and services must be adequate to meet future and current demands, particularly in the state's most populated areas.
- 2. <u>Preservation of natural and cultural resources:</u> Educating Californians about their state's invaluable resources is a critical part of ensuring these resources continue to be available for the enjoyment of current and future generations.
- 3. <u>Accessibility to all Californians:</u> All citizens have the right to enjoy California's park and recreation legacy.

Local

City of Sacramento 2035 General Plan

The following goals and policies from the Parks and Recreation Element (ERC) related to recreation and are relevant to the Build Alternative (City of Sacramento 2015a).

Goal ERC 2.2 Parks, Community, and Recreation Facilities and Services. Plan and develop parks, community and recreation facilities, and services that enhance community livability; improve public health

and safety; are equitably distributed throughout the City; and are responsive to the needs and interests of residents, employees, and visitors.

Policy ERC 2.2.4 Park Acreage Service Level Goal. The City shall strive to develop and maintain five acres of neighborhood and community parks and other recreational facilities and/or sites per 1,000 people of population.

City of Sacramento Municipal Code

Chapter 16.64 (Parks and Recreational Facilities). This chapter provides standards and formulas for the dedication of parkland and in-lieu fees. These policies help the City acquire new parkland. This chapter sets forth the standard that five acres of property for each 1,000 persons residing within the City be devoted to local recreation and park purposes.

The City of Sacramento Parks and Recreation Master Plan (2005-2010)

The City of Sacramento Parks and Recreation Master Plan (PRMP) includes various implementation strategies to help fulfil the vision and goals of the PRMP. The strategies that are relevant to the Build Alternative include:

4.0 Facility Use and Management

4.2 Protect and invest in the parks and recreation system's infrastructure (including all turf, landscaping, buildings, and other physical elements/improvements).

8.0 Maintenance (Parks)

8.2 Assess the physical condition of all key City park and recreation system infrastructure elements.

12.0 Planning, Design, and Development

12.7 Develop parks and recreation facilities according to the City of Sacramento's Park Design and Development Standards.

Old Sacramento State Historic Park General Plan and FEIR (2014)

The Old Sacramento State Historic Park General Plan (OSSHP) Final EIR identifies planned recreational uses or facilities for the OSSHP corridor. The plan and 2014 FEIR specifically exclude the segment between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21); therefore, there are no planned recreational uses or facilities within the proposed Project area.

Environmental Setting

The Sacramento area is served by a variety of recreational resources. Recreational resources include rivers, ponds, bike trails, and parks maintained by the City of Sacramento. Recreational resources within or adjacent to the Project area include Edwin J. Z'berg Park, Charlie Jensen Park, Belle Cooledge Community Center, Sacramento River Parkway, William Land Park, and Bing Maloney Golf Course (see Figure 21).

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to recreation. When an impact is determined to be significant, mitigation measures have been identified that would reduce or avoid that impact.

Methodology of Analysis

In response to comments received and using the CEQA Environmental Checklist for guidance the following thresholds of significance for evaluating potential impacts were established. These thresholds are evaluated in the following section to determine whether potential recreation impacts from the Build Alternative on the baseline setting would be significant. A potential impact would be significant if the Build Alternative would:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated;
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment;
- Result in substantial interference with park recreation;
- Result in permanent displacement of existing recreational facilities or substantial permanent decrease in access to existing recreational facilities or opportunities.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact REC-1: Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Build Alternative

As shown in Figure 21, two parks and recreation areas are located adjacent to the eastern extent of the study area, two are located in the study area but will not be impacted by the Build Alternative, and two are within the direct impact area for the trail. These locations are publicly owned and/or accessible. The Build Alternative would include an access route into Edwin J. Z-berg Park and a walking path through Charlie Jensen Park. No other parks within or adjacent to the study area would be affected by the Build Alternative. Although the multi-use trail would encourage the use of existing parks by providing alternate means of access, the trail would not increase the overall number of users who could have accessed it before by vehicle or an alternate walking route. Therefore, the Build Alternative would not cause or accelerate substantial physical deterioration of existing area parks or recreational facilities.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, access to and use of existing parks and recreational services would remain the same.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact REC-2: Potential to include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Build Alternative

The proposed multi-use trail would provide a new recreational facility for local and regional users; however, the trail would not have any adverse physical effects on the environment that could not be mitigated to a less than significant level. Additionally, the Project does not create a need for construction or expansion of recreational facilities beyond what was anticipated in the 2035 General Plan or the City of Sacramento Bikeway Master Plan.

Level of Significance: No Impact.

Mitigation Required: None Required

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2 ∎Miles FIGURE 21 Parks and Recreation Areas in and Adjacent to the Project Study Area ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

No Project Alternative

The multi-use trail would not be constructed; therefore, access to and use of existing parks and recreational services would remain the same.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact REC-3: Potential to result in substantial interference to park recreation.

Build Alternative

The proposed trail would 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 utilizing public right of way and public agency parcels, providing public access to parks throughout the Sacramento area. No impact would occur.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, access to and use of existing parks and recreational services would remain the same.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact REC-4: Potential to result in permanent displacement of existing recreational facilities or substantial permanent decrease in access to existing recreational facilities or opportunities.

Build Alternative

The Build Alternative would include an access route into Edwin J. Z-berg Park and a walking path through Charlie Jensen Park. No other parks within or adjacent to the study area would be affected by the Build Alternative. The Build Alternative would not result in permanent displacement of existing recreational facilities or decrease access to existing facilities; therefore, no impact would occur.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, access to and use of existing parks and recreational services would remain the same.

Level of Significance: No impact.

Required Mitigation: None Required.

Mitigation Measures

None Required.

2.14 TRANSPORTATION AND TRAFFIC

This section describes the regulatory and environmental setting for transportation and traffic. It also describes impacts on transportation and traffic that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal

No federal plans, policies, regulations, or laws related to transportation/traffic apply to the Project.

State

California Department of Transportation

The California Department of Transportation (Caltrans) manages interregional transportation, including the management and construction of the California highway system. In addition, Caltrans is responsible for the permitting and regulation of state roadways. State facilities likely to be used as regional access routes by construction traffic include I-5. Caltrans requires that permits be obtained for transportation of oversized loads and transportation of certain materials, and for construction-related traffic disturbance.

Local

City of Sacramento 2035 General Plan

The City of Sacramento 2035 General Plan requires that all Projects that include construction activities must complete a Traffic Management Plan (also required by the Sections 12.20.020 and 12.20.030 of the Sacramento City Code). These Traffic Management Plans require review and approval by the City's Public Works Department (City of Sacramento 2015a).

The Mobility Element of the City of Sacramento's 2035 General Plan outlines goals and policies that coordinate the transportation and circulation system with planned land uses and the relevant goal and policies are as follows:

Goal M 1.2 Multimodal System. Increase multimodal accessibility (i.e., the ability to complete desired personal or economic transactions via a range of transportation modes and routes) throughout the city and region with an emphasis on walking, bicycling, and riding transit.

Policy M 1.2.2 Level of Service (LOS) Standard. 2 Level of Service (LOS) Standard. The City shall implement a flexible context- sensitive Level of Service (LOS) standard and will measure traffic operations against the vehicle LOS thresholds established in this policy. The City will measure Vehicle LOS based on the methodology contained in the latest version of the *Highway Capacity Manual* (HCM) published by the Transportation Research Board. The City's specific vehicle LOS thresholds have been defined based on community values with respect to modal priorities, land use context, economic development, and environmental resources and constraints. As such, the City has established variable LOS thresholds appropriate for the unique characteristics of the City's diverse neighborhoods and communities. The City will strive to operate the roadway network at LOS D or better for vehicles during typical weekday conditions, including AM and PM peak hour conditions with the following exceptions described below:

A. Core Area (Central City Community Plan Area) - LOS F allowed

- B. Priority Investment Areas LOS F allowed
- C. LOS E Roadways LOS E is allowed for the following roadways because expansion of the roadways would cause undesirable impacts or conflict with other community values.
 - 65th Street: Elvas Avenue to 14th Avenue
 - Arden Way: Royal Oaks Drive to I-80 Business
 - Broadway: Stockton Boulevard to 65th Street

- College Town Drive: Hornet Drive to La Rivera Drive
- El Camino Avenue: I-80 Business to Howe Avenue
- Elder Creek Road: Stockton Boulevard to Florin Perkins Road
- Elder Creek Road: South Watt Avenue to Hedge Avenue
- Fruitridge Road: Franklin Boulevard to SR 99
- Fruitridge Road: SR 99 to 44th Street
- Howe Avenue: El Camino Avenue to Auburn Boulevard
- Sutterville Road: Riverside Boulevard to Freeport Boulevard

LOS E is also allowed on all roadway segments and associated intersections located within ½ mile walking distance of light rail stations.

D. Other LOS F Roadways - LOS F is allowed for the following roadways because expansion of the roadways would cause undesirable impacts or conflict with other community values.

- 47th Avenue: State Route 99 to Stockton Boulevard
- Arcade Boulevard: Marysville Boulevard to Roseville Road
- Carlson Drive: Moddison Avenue to H Street
- El Camino Avenue: Grove Avenue to Del Paso Boulevard
 - Elvas Avenue: J Street to Folsom Boulevard
- Elvas Avenue/56th Street: 52nd Street to H Street
- Florin Road: Havenside Drive to Interstate 5
- Florin Road: Freeport Boulevard to Franklin Boulevard
- Florin Road: Interstate 5 to Freeport Boulevard
- Folsom Boulevard: 47th Street to 65th Street
- Folsom Boulevard: Howe Avenue to Jackson Highway
- Folsom Boulevard: US 50 to Howe Avenue
- Freeport Boulevard: Sutterville Road (North) to Sutterville Road (South)
- Freeport Boulevard: 21st Street to Sutterville Road (North)
- Freeport Boulevard: Broadway to 21st Street
- Garden Highway: Truxel Road to Northgate Boulevard
- H Street: Alhambra Boulevard to 45th Street
- H Street 45th: Street to Carlson Drive
- Hornet Drive: US 50 Westbound On-ramp to Folsom Boulevard
- Howe Avenue: US 50 to Fair Oaks Boulevard
- Howe Avenue: US 50 to 14th Avenue
- Raley Boulevard: Bell Avenue to Interstate 80
- South Watt Avenue: US 50 to Kiefer Boulevard (V/C: 1.19)
- West El Camino Avenue: Northgate Boulevard to Grove Avenue

E. If maintaining the above LOS standards would, in the City's judgment be infeasible and/or conflict with the achievement of other goals, LOS E or F conditions may be accepted provided_that provisions are made to improve the overall system, promote non-vehicular transportation, and/or implement vehicle trip reduction measures as part of a development Project or a city-initiated Project. Additionally the City shall not expand the physical capacity of the planned roadway network to accommodate a Project beyond that identified in Figure M4 and M4a (2035 General Plan Roadway Classification and Lanes).

Goal M 4.1 Street and Roadway System. Create a context-sensitive street and roadway system that provides access to all users and recognizes the importance that roads and streets play as public space. As such, the City shall strive to balance the needs for personal travel, goods movement, parking, social activities, business activities, and revenue generation, when planning, operating, maintaining, and expanding the roadway network.

Policy M 4.1.1 Emergency Access. The City shall develop a roadway system that is redundant (i.e., includes multiple alternative routes) to the extent feasible to ensure mobility in the event of emergencies.

Goal M 4.3 Neighborhood Traffic. Enhance the quality of life within existing neighborhoods through the use of neighborhood traffic management and traffic calming techniques, while recognizing the City's desire to provide a grid system that creates a high level of connectivity.

Policy M 4.3.1 Neighborhood Traffic Management. The City shall continue wherever possible to design streets and approve development applications in a manner as to reduce high traffic flows and parking problems within residential neighborhoods.

Goal M 5.1 Integrated Bicycle System. Create and maintain a safe, comprehensive, and integrated bicycle system and set of support facilities throughout the city that encourage bicycling that is accessible to all. Provide bicycle facilities, programs and services and implement other transportation and land use policies as necessary to achieve the City's bicycle mode share goal as documented in the Bicycle Master Plan.

Goal M 6.1 Managed Parking. Provide and manage parking such that it balances the citywide goals of economic development, livable neighborhoods, sustainability, and public safety with the compact multi-modal urban environment prescribed by the General Plan.

Policy M 6.1.1 Appropriate Parking. The City shall manage public parking and regulate the provision and management of private parking to support parking availability and auto access to neighborhoods across the city, with consideration for access to existing and funded transit service, mixed use development, and shared parking opportunities.

Sacramento City Code

Section 12.20.020 of the Sacramento City Code has the following provisions related to construction traffic within the City limits:

- A. Except when performing emergency repairs, no person shall perform any work that will obstruct vehicular traffic on a city street unless a traffic control plan has been approved by the director.
- B. All work requiring a traffic control plan shall conform to the conditions and requirements of the approved plan.
- C. Where a traffic control plan is required, the approved plan must be available at the site for inspection by the director during all work
- D. If the director determines that actual traffic conditions under the approved plan are hazardous to public safety, the director may require the plan to be immediately modified. If the hazardous conditions cannot be eliminated by plan modification the director may require work under the plan to be stopped, and the plan suspended, until the safety hazard is remedied.

The specific requirements for a traffic control plan are described in Section 12.20.030 of the Sacramento City Code and should include the appropriate diagrams, proposed time periods that traffic control would be in effect, and any proposed phases of the Project that would affect the traffic control plan.

City of Sacramento Bicycle Master Plan (2018)

The purpose of the Sacramento City Bicycle Master Plan is to establish bicycle-related investments, policies, programs and strategies to establish a complete bicycle system. This will encourage more bicycling by the citizens of Sacramento for both transportation and recreation, thereby allowing the City of Sacramento to meet General Plan emission targets. The Bicycle Master Plan was updated in 2018 to further engage under-represented neighborhoods, evaluate the equity related to bicycle infrastructure, and identify best practice bikeway designs to better connect the City's Low-stress bikeway network. The proposed Project is included within the 2018 Master Plan (see Figure 22).

City of Sacramento Pedestrian Master Plan (2006)

The purpose of the Pedestrian Master Plan is to make Sacramento a model pedestrian-friendly city, also known as the "Walking Capital" (Pedestrian Master Plan 2006). The current overarching objectives of the Plan are to institutionalize pedestrian considerations and to improve the current pedestrian deficiencies. The goals of the Plan include improving awareness through education, creating a walkable pedestrian environment, and increasing pedestrian safety.

Environmental Setting

The Project begins approximately 0.4 mile south of Pocket Road near the Freeport Water Tower adjacent to the I-5 bridge over Freeport Boulevard, and extends 4.8 miles north along the abandoned railway corridor within the City of Sacramento. At the southern entry, the bike trail would connect directly to the newly constructed Freeport Shores Trail and the South Sacramento Parkway West. The route would then cross at Meadowview-Pocket Road and continue north through the South Land Park neighborhood towards William Land Park and the Sacramento River Parkway. North of Sutterville Road, the trail connects to the Sacramento River Parkway via two alignments: west along Sutterville Road with Class 2 bike lanes, and northwest along the existing railway corridor.

City of Sacramento Bicycle Master Plan (2018)

The City of Sacramento Bicycle Master Plan (2018) wants to achieve a "safe, comfortable and continuous network of bikeway attracting and serving bicyclists of all ages and abilities from all neighborhoods" to integrate bicycling as a fundamental part of the everyday transportation for Sacramento's inhabitants. An efficient, integrated pedestrian- and bicycle-friendly system is essential to maintaining the quality of life and facilitating the economic and cultural growth of the City.

Bicycle and Pedestrian Corridors

A brief description of bicycle facility types is presented below.

- Class I Bikeway (Bicycle Path) Provides a separate ROW and is designated for the exclusive use of bicycles and pedestrians with vehicle and pedestrian cross-flow minimized.
- Class II Bikeway (Bicycle Lane) Provides a restricted ROW and is designated for the use of bicycles with a striped lane on a street or highway. Vehicle parking and vehicle/pedestrian crossflow are permitted.
- Class III (Bicycle Route) Provides for a ROW designated by signs and/or pavement markings for shared use with pedestrians or motor vehicles.

Currently there are no Class I bicycle facilities or pedestrian pathways within the study area. Figure 22 displays the currently planned bicycle facilities (multi-modal trail) in the area.

Parking

The majority of parking in the study area is associated with residential and commercial developments. The Build Alternative is not anticipated to reduce any available parking within the study area. A new trail-head parking lot will be constructed in the northern portion of the Project on the corner of San Mateo Way and Riverside Boulevard.

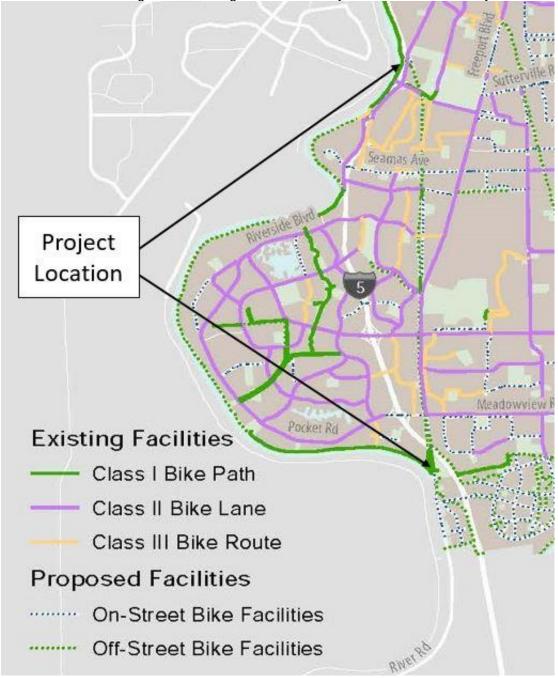


Figure 22. Existing and Planned Bicycle Facilities in the Study Area

Source: City of Sacramento Master Bicycle Plan (2015), page 42.

Public Transportation

Public transit services provided in the Project study area include multiple bus stops and intermittent Class II and III bike routes throughout the study area. The Build Alternative would help meet the goal of the City's General Plan to develop and maintain an integrated, multi-modal district of efficient transit, walking, and biking.

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to transportation and traffic. When an impact is determined to be significant, mitigation measures were identified that would reduce or avoid that impact.

Methodology of Analysis

Using the CEQA Environmental Checklist for guidance the following thresholds of significance for evaluating potential impacts were established. These thresholds are evaluated in the following section to determine whether potential utility and service systems impacts from the Build Alternative on the baseline setting would be significant. A potential impact would be significant if the Build Alternative would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Result in inadequate emergency access; or
- Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Project Impact Analysis

This section discusses potential impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact TRANS-1: Potential to conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

Build Alternative

The Build Alternative involves the construction of a pedestrian and bicycle facility. The Build Alternative is consistent with the General Plan Master EIR and the City Bikeway Master Plan. The City Bikeway Master Plan shows a continuous non-motorized trail system along the abandoned railway corridor (see Figure 22). The proposed Class I trail would not be constructed within existing roadways thereby reducing effectiveness of the performance of the circulation system. The Build Alternative would provide an additional transportation method for the community and would not impact existing public transportation systems within the study area. The Build Alternative is not anticipated to reduce any available parking within the study area. Two new trail-head parking lots will be constructed as a part of the Build Alternative. One is located in the northern portion of the Project on the Corner of San Mateo Way and Riverside Boulevard, and the other is located in the southern portion of the Project along Freeport

Short-term traffic operations at intersections would be temporarily affected during construction of the trail crossing; however, one lane in each direction would be kept open for through traffic throughout

Boulevard. No impact to existing parking lots within the study area would occur.

construction. Short-term construction impacts to traffic operations are anticipated to be minimal. Temporary impacts to traffic flow as a result of construction activities would be minimized through construction phasing and signage and a traffic control plan.

Level of Significance: Less than Significant with Mitigation Incorporated

Mitigation Required: TRA-1

No Project Alternative

The multi-use trail would not be constructed; therefore, the No Project Alternative would be inconsistent with the City's General Plan and Bicycle Plan for a planned Class I multi-use trail through the Del Rio corridor.

Level of Significance: Less than significant.

Required Mitigation: None Required.

Impact TRANS-2: Potential to conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

Build Alternative

Long-term traffic operations and access to public transit would not be adversely affected by the Build Alternative. The Project will not create additional vehicle trips. Therefore, no additional volume would be generated and would not result in any new traffic impacts. Short-term traffic operations at intersections would be temporarily affected during construction of the trail crossing; however, one lane in each direction would be kept open for through traffic throughout construction. Short-term construction impacts to traffic operations are anticipated to be minimal. Temporary impacts to traffic flow as a result of construction activities would be minimized through construction phasing, signage and a traffic control plan.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: TRA-1

No Project Alternative

The multi-use trail would not be constructed; therefore, the long-term traffic operations and access to public transit would remain the same.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact TRANS-3: Potential to result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Build Alternative

The Build Alternative would construct a multi-use trail and would not result in a change in, or conflict with, air traffic patterns. The nearest public airport to the Project site is the Sacramento Executive Airport, which is located approximately 0.30 mile east of the Project site. The nearest private airport is the UC Davis Medical Center Life Flight base heliport located 2.8 miles north east of the Project site.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no changes to air traffic patterns and traffic levels are anticipated.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact TRANS-4: Potential to substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Build Alternative

Design features for the multi-use trail would comply with City safety standards. The trail would not include any sharp curves. Lighting and pedestrian crossing signalization would be constructed where the trail crosses intersections. The Project is compatible with the existing land use designations in the City General Plan.

Level of Significance: Less than Significant.

Mitigation Required: None Required.

No Project Alternative

The multi-use trail would not be constructed; therefore, the existing conditions within the corridor would remain the same.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact TRANS-5: Potential to result in inadequate emergency access.

Build Alternative

No short-term or long-term impacts to emergency access would occur as a result of the Build Alternative. The existing police and fire stations have a capacity to serve any Project-related needs that may arise. Short-term traffic operations at intersections would be temporarily affected during construction of the trail crossing; however, one lane in each direction would be kept open for through traffic and emergency access throughout construction. Short-term construction impacts to traffic operations are anticipated to be minimal. Temporary impacts to traffic flow as a result of construction activities would be minimized through construction phasing, signage and a traffic control plan. The trail will be designed to allow for emergency access as needed.

Level of Significance: Less than Significant with Mitigation

Mitigation Required: TRA-1 and TRA-2

No Project Alternative

The multi-use trail would not be constructed; therefore, emergency access within the corridor would remain the same.

Level of Significance: No Impact.

Required Mitigation: None Required.

Impact TRANS-6: Potential to conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Build Alternative

The Build Alternative would not adversely affect bicycle or pedestrian travel, bicycle paths or fail to adequately provide for access by pedestrian or bicycle. Once built, citizens in the area will have greater connectivity using non-motorized means. Commuter and recreational bicyclists in South Sacramento will have also have greater through access to the Sacramento River Trail and communities throughout Sacramento.

Level of Significance: Less than Significant.

Mitigation Required: None Required.

No Project Alternative

The multi-use trail would not be constructed; therefore, the No Project Alternative would be inconsistent with the City's General Plan and Bicycle Plan for a planned Class I multi-use trail through the Del Rio corridor.

Level of Significance: Less than significant.

Required Mitigation: None Required.

Mitigation Measures

TRA-1: Temporary impacts to traffic flow as a result of construction activities would be minimized through construction phasing, signage and a traffic control plan.

TRA-2: Emergency public services, local law enforcement agencies, and local businesses will be notified of the Build Alternative and any planned partial intersection closures. This notice shall occur at least one month before construction begins.

2.15 UTILITIES AND SERVICE SYSTEMS

This section describes the environmental and regulatory setting for utilities and services systems. It also describes impacts on utilities and services systems that would result from implementation of the Build Alternative and mitigation for significant impacts, where feasible.

Regulatory Framework

Federal

Clean Water Act

The Federal Water Pollution Control Act (33 U.S.C. 1251 et seq.), otherwise known as the Clean Water Act (CWA), sets forth national goals that waters shall be "fishable, swimmable" waters (CWA Section 101 (a)(2)). To enforce the goals of the CWA, the United States Environmental Protection Agency (USEPA) established the National Pollutant Discharge Elimination System (NPDES) program. NPDES is a national program for regulating and administering permits for discharges to receiving waters, including non-point sources. Under Section 1251 (b) of the CWA, Congress and the USEPA must recognize and preserve the primary responsibilities and rights of states concerning the reduction of pollution in water resources.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources.

The SDWA authorizes the USEPA to establish minimum standards to protect tap water and requires all owners or operators of public water systems to comply with these primary standards. The 1996 amendments to SDWA require that USEPA consider a detailed risk and cost assessment, and best available peer-reviewed science, when developing these standards. State governments, which can be approved to implement these rules for USEPA, also encourage attainment of secondary standards (nuisance-related).

National Pollution Discharge Elimination System Permit

Discharge of treated wastewater to surface water(s) of the United States, including wetlands, require a NPDES permit. In California, the Regional Water Quality Control Board (RWQCB) administer the issuance of these federal permits. Obtaining an NPDES permit requires preparation of detailed information, including characterization of wastewater sources, treatment processes, and effluent quality. Whether or not a permit may be issued, the conditions of a permit are subject to many factors such as basin plan water quality objectives, impaired water body status of the receiving water, historical flow rates of the receiving water, effluent quality and flow, the air quality State Implementation Plan (SIP), the California Toxics Rule, and established total maximum daily loading rates for various pollutants. These factors are highly specific to the potential discharge point. Obtaining an NPDES permit is generally considered difficult in inland areas and may not be possible in sensitive areas.

U.S. Environmental Protection Agency's National Combined Sewer Overflow Control Policy

The Combined Sewer Overflow Control Policy establishes a consistent national approach for controlling discharges from the Combined Sewer Overflow to the nation's waters through the NPDES permit program. The Combined Sewer Overflow Control Policy mandates that permittees with Combined Sewer Overflow should submit appropriate documentation demonstrating implementation of the nine minimum controls, which consist of:

- 1. Proper operation and regular maintenance programs for the sewer system and the Combined Sewer Overflows;
- 2. Maximum use of the collection system for storage;
- 3. Review and modification of pretreatment requirements to assure Combined Sewer Overflow impacts are minimized;
- 4. Maximization of flow to the publicly owned treatment works for treatment;

- 5. Prohibition of Combined Sewer Overflows during dry weather;
- 6. Control of solid and floatable materials in Combined Sewer Overflows;
- 7. Pollution prevention;
- 8. Public notification to ensure that the public receives adequate notification of Combined Sewer Overflow occurrences and Combined Sewer Overflow impacts; and
- 9. Monitoring to effectively characterize Combined Sewer Overflow impacts and the efficacy of Combined Sewer Overflow controls.

State

Porter-Cologne Water Quality Act

The State of California established the State Water Resources Control Board (SWRCB), which oversees the nine RWQCBs, through the Porter-Cologne Water Quality Control Act. Through the enforcement of the Porter Cologne Act, the SWRCB determines the beneficial uses of the waters (surface and groundwater) of the State, establishes narrative and/or numerical water quality standards, and initiates policies relating to water quality. The SWRCB and, more specifically, the RWQCB, is authorized to prescribe Waste Discharge Requirements (WDR) for the discharge of waste, which may impact the waters of the State. Furthermore, the development of water quality control plans, or Basin Plans, are required by Porter-Cologne to protect water quality.

The SWRCB issues both General Construction Permits and individual permits under the auspices of the federal NPDES program. Projects disturbing more than one acre of land during construction are required to file a Notice of Intent (NOI) with the SWRCB to be covered under the State NPDES General Construction Permit (State General Permit) (Adopted Order 2009-0009-DWQ (As amended by 2010-0014-DWQ and 2012-0006-DWQ)) for discharges of stormwater associated with construction activity. Construction activities that are subject to this General Permit includes clearing, grading, disturbances to the ground such as stockpiling, or excavation that results in soil disturbances of at least one acre of total land area. The Project proponent must implement control measures that are consistent with the State General Permit. A Stormwater Pollution Prevention Plan (SWPPP) must be developed and implemented for each site covered by the General Permit. A SWPPP describes Best Management Practices (BMP) the discharger would use to protect stormwater runoff and reduce potential impacts to surface water quality through the construction period. The SWPPP must contain the following: a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a water body listed on the 303(d) list for sediment.

Urban Water Management Planning Act

In 1983, the California Legislature enacted the Urban Water Management Planning Act (UWMPA) (Water Code Sections 10610–10656). The UWMPA requires that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000-acre foot per year (AFY) shall prepare and adopt a UWMPA. The UWMPA states that urban water suppliers should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The UWMPA also states that the management of urban water demands and the efficient use of water shall be actively pursued to protect both the people of the state and their water resources.

General Waste Discharge Requirements for Sanitary Sewer Systems

The General WDRs for Sanitary Sewer Systems were adopted by the SWRCB in May 2006. These WDRs require local jurisdictions to develop a sewer system management plan (SSMP) that addresses the necessary operation and emergency response plans to reduce sanitary sewer overflows. The WDRs require that the local jurisdiction approve the SSMP. The local jurisdiction for the City of Sacramento falls under the Central Valley Regional Water Quality Control Board (CVRWQCB) and the Sacramento City Council approved the City's SSMP on January 2014.

California Integrated Waste Management Act

To minimize the amount of solid waste that must be disposed of by transformation (i.e., recycling) and land disposal, the State Legislature passed the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. According to AB 939, all cities and counties are required to divert 25percent of all solid waste from landfill facilities by January 1, 1995, and 50- percent by January 1, 2000. Solid waste plans are required to explain how each city's AB 939 plan will be integrated within the respective county plan. They must promote (in order of priority) source reduction, recycling and composting, and environmentally safe transformation and land disposal. Cities and counties that do not meet this mandate are subject to \$10,000-per-day fines.

Local

City of Sacramento Department of Utilities

The City of Sacramento regulates the discharge of groundwater dewatering effluent to the City's sewer system. The City's Department of Utilities (DOU) Engineering Services Policy No. 0001 (Resolution No. 92-439) requires approval of a Memorandum of Understanding (MOU) for long term (greater than one week) groundwater dewatering discharges to the sewer. The MOU must cover proposed dewatering details such as flow rate, system design, and contaminant monitoring plan. Discharges to the sewer must meet the Regional San and RWQCB-approved levels. Dischargers to the sewer must obtain a Regional San discharge permit.

Sacramento City Code

Chapter 13.08 of the Sacramento City Code sets requirements for permitted discharges to the sewer service system. There are provisions for charges and fees for customers, pretreatment, private sewer or storm drain lines, structures overlying public utilities, swimming pools and fish ponds, air conditioning and refrigeration devices, interruptions and discontinuation of service, inspections, and construction of sewer and storm drain facilities.

Sacramento Regional County Sanitation District

In 2004, the Sacramento Regional County Sanitation District (Regional San) passed the Sewer Impact Fee Ordinance requiring fees to be paid to the Regional San for any users connecting to or expanding sewer collection systems, to mitigate the impact on the Regional San Wastewater Treatment Plant (Regional San WWTP) and conveyance systems.

Sacramento Regional Solid Waste Authority The Sacramento Regional Solid Waste Authority (SWA) is a joint powers authority of the County and the cities of Sacramento and Citrus Heights. The SWA Board of Directors consists of elected officials from the County and the member cities. The SWA regulates commercial solid waste collection by franchised haulers through SWA ordinances. Among other things, SWA ordinances require franchised haulers to achieve 30 percent recycling and to offer recycling programs to multifamily complexes.

Sacramento Municipal Code

Chapter 17.616, Recycling and Solid Waste Disposal Regulations, of the Sacramento City Code provides regulations concerning recycling and solid waste disposal. Policies within the Code include guidelines regarding the location, size, and design features of recycling and trash enclosures, which are necessary to lengthen the lifespan of landfills and meet state mandated goals for waste reduction.

Sacramento 2035 General Plan

The following goals and policies from the Sacramento 2035 General Plan Utilities (U) Elements and Environmental Resources (ER) Elements are applicable to utilities and service systems.

Goal U 1.1 High-Quality Infrastructure and Services. Provide and maintain efficient, high quality public infrastructure facilities and services throughout the city.

Policy U 1.1.1 Provision of Adequate Utilities. The City shall continue to provide and maintain adequate water, wastewater, and stormwater drainage utility services to areas in the city, and shall

provide and maintain adequate water, wastewater, and stormwater drainage utility services to areas in the city that do not currently receive these City services upon funding and construction of necessary infrastructure.

Policy U 1.1.2 Citywide Level of Service Standards. The City shall establish and maintain service standards [Levels of Service (LOS)] for water, wastewater, stormwater drainage, and solid waste services.

Policy U 1.1.3 Sustainable Facilities and Services. The City shall continue to provide sustainable utility services and infrastructure in a cost-efficient manner.

Policy U 1.1.5 Growth and Level of Service. The City shall require new development to provide adequate facilities or pay its fair share of the cost for facilities needed to provide services to accommodate growth without adversely impacting current service levels.

Policy U 1.1.6 Infrastructure Finance. The City shall develop and implement a financing strategy and assess fees to construct needed water, wastewater, stormwater drainage, and solid waste facilities to maintain established service levels and to mitigate development impacts to these systems (e.g., pay capital costs associated with existing infrastructure that has inadequate capacity to serve new development). The City shall also assist developers in identifying funding mechanisms to cover the cost of providing utility services in infill areas.

Policy U 1.1.9 Utilities Location. The City shall limit, to the extent financially and technically feasible, the construction of major infrastructure facilities in areas better suited for infill and urban development.

Policy U 1.1.10 Safe, Attractive, and Compatible Utility Design. The City shall ensure that public utility facilities are designed to be safe, aesthetically pleasing, and compatible with adjacent uses.

Policy U 1.1.11 Underground Utilities. The City shall require undergrounding of all new publicly-owned utility lines, encourage undergrounding of all privately-owned utility lines in new developments, and work with electricity and telecommunications providers to underground existing overhead lines.

Goal U 3.1 Adequate and Reliable Sewer and Wastewater Facilities. Provide adequate and reliable sewer and wastewater facilities that collect, treat, and safely dispose of wastewater.

Policy U 3.1.1 Sufficient Service. The City shall provide sufficient wastewater conveyance, storage, and pumping capacity for peak sanitary sewer flows and infiltration.

Policy U 3.1.2 New Developing Areas. The City shall ensure that public facilities and infrastructure are designed and constructed to meet ultimate capacity needs to avoid the need for future upsizing. For facilities subject to incremental upsizing, initial design shall include adequate land area and any other elements not easily expanded in the future.

Policy U 3.1.3 Stormwater Infiltration Reduction. The City shall develop design standards that reduce infiltration into new City-maintained sewer pipes.

Policy U 3.1.4 Combined Sewer System Rehabilitation and Improvements. In keeping with its Combined Sewer System (CSS) Long Term Control Plan (LTCP), the City shall continue to rehabilitate the CSS to decrease flooding, CSS outflows and Combined System Overflow (CSO). Through these improvements and new development requirements the City shall also insure that development in the CSS does not result in increased flooding, CSS outflows or CSOs.

Policy U 3.1.5 Methane Recovery. The City shall support the efforts of the Sacramento Regional County Sanitation District (SRCSD) to develop and maintain methane recovery facilities and coordinate efforts to evaluate methane emissions and potential capture at primary and secondary clarifiers and force system mains; maintain methane recovery systems and digester gas combustion systems at wastewater

treatment plants; develop waste-to-energy Projects at 50 percent of wastewater treatment plants; and evaluate potential for biofuel production at the Sacramento Regional Wastewater Treatment Plant.

Goal U 4.1 Adequate Stormwater Drainage. Provide adequate stormwater drainage facilities and services that are environmentally sensitive, accommodate growth, and protect residents and property.

Policy 4.1.1 Adequate Drainage Facilities. The City shall ensure that all new drainage facilities are adequately sized and constructed to accommodate stormwater runoff in urbanized areas.

Policy 4.1.2 Master Planning. The City shall implement a master plan program to:

- Identify facilities needed to prevent 10-year event street flooding and 100-year event structure flooding
- Ensure that public facilities and infrastructure are designed pursuant to approved basin master plans
- Ensure that adequate land area and any other elements are provided for facilities subject to incremental sizing (e.g., detention basins and pump stations)
- Consider the use of "green infrastructure" and Low Impact Development (LID).

Policy U 4.1.3 Regional Stormwater Facilities. The City shall coordinate efforts with Sacramento County and other agencies in the development of regional stormwater facilities.

Policy U 1.1.4 Watershed Drainage Plans. The City shall require developers to prepare watershed drainage plans for proposed developments that define needed drainage improvements per City standards, estimate construction costs for these improvements, and comply with the City's National Pollutant Discharge Elimination System (NPDES) permit.

Policy U 4.1.5 Green Stormwater Infrastructure. The City shall encourage "green infrastructure" design and Low Impact Development (LID) techniques for stormwater facilities (i.e., using vegetation and soil to manage stormwater) to achieve multiple benefits (e.g., preserving and creating open space, improving runoff water quality).

Goal U 5.1 Solid Waste Facilities. Provide adequate solid waste facilities, meet or exceed State law requirements, and utilize innovative strategies for economic and efficient collection, transfer, recycling, storage, and disposal of refuse.

Policy U 5.1.8 Diversion of Waste. The City shall encourage recycling, composting, and waste separation to reduce the volume and toxicity of solid wastes sent to landfill facilities.

Policy U 5.1.15 Recycling and Reuse of Construction Wastes. The City shall require recycling and reuse of construction wastes, including recycling materials generated by the demolition and remodeling of buildings, with the objective of diverting 85 percent to a certified recycling processor.

Goal ER 1.1 Water Quality Protection. Protect local watersheds, water bodies and groundwater resources, including creeks, reservoirs, the Sacramento and American Rivers and their shorelines.

Policy ER 1.1.1 Conservation of Open Space Areas. The City shall conserve and where feasible create or restore areas that provide important water quality benefits such as riparian corridors, buffer zones, wetlands, undeveloped open space areas, levees, and drainage canals for the purpose of protecting water resources in the city's watershed, creeks, and the Sacramento and American rivers.

Policy ER 1.1.2 Regional Planning. The City shall continue to work with local, State, and Federal agencies and private watershed organizations to improve water quality.

Policy ER 1.1.3 Stormwater Quality. The City shall control sources of pollutants and improve and maintain urban runoff water quality through stormwater protection measures consistent with the City's NPDES Permit.

Policy ER 1.1.4 New Development. The City shall require new development to protect the quality of water bodies and natural drainage systems through site design (e.g., cluster development), source controls, stormwater treatment, runoff reduction measures, best management practices (BMPs) and Low Impact Development (LID), and hydromodification strategies consistent with the City's NPDES Permit.

Policy ER 1.1.5 Limit Stormwater Peak Flows. The City shall require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.

Policy ER 1.1.6 Post-Development Runoff. The City shall impose requirements to control the volume, frequency, duration, and peak flow rates and velocities of runoff from development Projects to prevent or reduce downstream erosion and protect stream habitat.

Policy ER 1.1.7 Construction Site Impacts. The City shall minimize disturbances of natural water bodies and natural drainage systems caused by development, implement measures to protect areas from erosion and sediment loss, and continue to require construction contractors to comply with the City's erosion and sediment control ordinance and stormwater management and discharge control ordinance.

Policy ER 1.1.8 Clean Watershed. The City shall continue ongoing Sacramento and American River source water protection efforts (e.g., Keep Our Waters Clean), based on watershed sanitary survey recommendations.

Environmental Setting

Various utilities exist within the Project area including sewer, water, gas, overhead and underground electrical, overhead and underground telephone and communications, storm drains, irrigation canals, street lighting and signal equipment.

The following existing utilities have been identified within the Project area:

- Cable Maintenance (overhead and underground) AT&T;
- Communications (overhead and underground) Various;
- Water Various;
- Electric (overhead and underground) SMUD;
- Gas PG&E;
- Telephone (overhead and underground) AT&T; and
- Sanitary Sewer Sacramento Area Sewer District; Sacramento Regional County Sanitation District.

Relocations are anticipated to occur where the trail conflicts with existing utilities, including electric, gas, telephone, communications, and drainage. Relocation of existing utilities would follow state and federal regulations and statutes. Coordination with utilities that would be need to be relocated would occur during the design phase. All utilities, including irrigation systems, would continue to be fully functional before, during, and after construction of the Project.

Environmental Impacts

This section analyzes the proposed alternatives' potential to result in significant impacts to utility and service systems. When an impact is determined to be significant, mitigation measures have been identified that would reduce or avoid that impact.

Methodology for Analysis

Using the CEQA Environmental Checklist for guidance the following thresholds of significance for evaluating potential impacts were established. These thresholds are evaluated in the following section to determine whether potential utility and service systems impacts from the Build Alternative on the baseline setting would be significant. A potential impact would be significant if the Build Alternative would:

- Exceed wastewater treatment requirements of the applicable RWQCB;
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Have insufficient water supplies available to serve the Project from existing entitlements and resources, or identify if new or expanded entitlements would be needed;
- Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments;
- Be served by a landfill with insufficient permitted capacity to accommodate the Project's solid waste disposal needs;
- Comply with federal, state, and local statutes and regulations related to solid waste.

Project Impact Analysis

This section discusses potential utility impacts associated with the proposed alternatives and provides mitigation measures where necessary.

Impact UTL-1: Potential to exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Build Alternative

The Project would result in the construction of a multi-use trail and walking path. The Project would not include the construction of any wastewater-generating uses. The Project would not increase population in the Project vicinity, and there would be no additional wastewater flows as a result of Project development; therefore, the Project would not have an adverse effect on wastewater treatment requirements.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no impacts to wastewater would occur.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact UTL-2: Potential to require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Build Alternative

The Project would result in the construction of a multi-use trail and walking path. The Project would not include the construction of any wastewater-generating uses. The Project would not increase population in the Project vicinity, and there would be no additional wastewater flows as a result of Project development; therefore, the Project would not result in the need for new or expanded wastewater facilities.

Level of Significance: No Impact

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no impacts to water or wastewater service would occur.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact UTL-3: Potential to require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Build Alternative

The Project would result in an increase of approximately 9.5 acres of paved surface area, which would contribute to an increase in the volume of storm water runoff from the multi-use trail surface. The Build Alternative design would include drainage facilities throughout the trail to prevent flooding during storm events. Additionally, the Project site has some areas of localized flooding. The Project would construct new storm drain pipes and inlets to minimize incidents of localized flooding. Measures WQ-1 through WQ-5 would be implemented to further control construction impacts due to additional runoff by incorporating and implementing the City's standards related to erosion control, grading activities, and stormwater drainage facilities; therefore, impacts would be considered less than significant with mitigation incorporated.

Level of Significance: Less than Significant With Mitigation.

Mitigation Required: WQ-1 and WQ-5

No Project Alternative

The multi-use trail would not be constructed; therefore, no additional paved surfaces or stormwater runoff would occur.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact UTL-4: Potential to have insufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed.

Build Alternative

Construction of the multi-use trail and walking path would require some water supply for dust control, clean-up, soil compaction, and long-term irrigation for new landscaping and trees; however, these activities would be temporary, short-term in duration, and would not require a substantial amount of water.

Water supplies that may be used for these activities could include a combination of sources from the City's municipal water supply. Currently these sources would have adequate water supplies needed for the construction of the Build Alternative. Therefore, the impact from construction and testing of the Build Alternative would be considered less than significant.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no additional water supplies would be needed.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact UTL-5: Potential to result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments.

Build Alternative

The Project would result in the construction of a multi-use trail and walking path. The Project would not include the construction of any wastewater-generating uses. The Project would not increase population in the Project vicinity, and there would be no additional wastewater flows as a result of Project development; therefore, the Project would not result in the need for new or expanded wastewater facilities.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, no impacts to wastewater would occur.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact UTL-6: Potential to be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs.

Build Alternative

The Project would not generate substantial solid waste during operation. Solid waste may be generated during construction; however, the amounts would not be substantial and would occur only during the construction period.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, solid waste would not be generated.

Level of Significance: No impact.

Required Mitigation: None Required.

Impact UTL-7: Potential to comply with federal, state, and local statutes and regulations related to solid waste.

Build Alternative

The City of Sacramento is currently in compliance with the State of California 50 percent waste diversion goal. The additional goals of the City of Sacramento regarding waste reduction include 75 percent waste diversion by 2020 and zero waste communitywide by 2040. Specific guidelines, such as requiring the recycling of construction and demolition debris, are being implemented in the City of Sacramento to help reach these goals. The Build Alternative would be in compliance with both the state and local regulations regarding waste from construction. Construction waste is expected to be limited and temporary in nature and would not conflict with any of the applicable goals and regulations. Therefore, the impact would be considered less than significant.

Level of Significance: Less than Significant

Mitigation Required: None Required

No Project Alternative

The multi-use trail would not be constructed; therefore, solid waste would not be generated.

Level of Significance: No impact.

Required Mitigation: None Required.

Mitigation Measures

See WQ-1 through WQ-3 in Section 2.8.

3.0 ALTERNATIVES

This chapter describes alternatives to the Build Alternative that were considered but rejected for further consideration. This chapter also compares the environmental impacts of those alternatives.

The principles used to guide selection of the alternatives analyzed in this Environmental Impact Report (EIR) are provided by section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines, which specifies that an EIR must do all of the following:

- Describe a reasonable range of potentially feasible alternatives to the Project that could attain most of the basic objectives of the Project
- Consider alternatives that could reduce or eliminate any significant environmental impacts of the Build Alternative, including alternatives that may be costlier or could otherwise impede the Project's objectives
- Evaluate the comparative merits of the alternatives

The focus and definition of the alternatives are governed by the "rule of reason," in accordance with section 15126.6(f) of the CEQA Guidelines. That is, the range of alternatives presented in this EIR must permit a reasoned choice by the City of Sacramento (City). The CEQA Guidelines require that an EIR evaluate at least one "No-Project Alternative," evaluate a reasonable range of alternatives to the Project, identify alternatives that were considered during the scoping process but were eliminated from detailed consideration, and identify the "environmentally superior alternative."

The evaluation of alternatives is conducted in less detail than for the Build Alternative. Consistent with section 15126.6(d) of the CEQA Guidelines, the information provided in this EIR about each alternative is sufficient to allow for a meaningful evaluation, analysis, and comparison of the alternatives with the Build Alternative.

3.1 ALTERNATIVES CONSIDERED AND SCREENING CRITERIA

This section describes the development of a reasonable range of alternatives to the Build Alternative, the method used to screen the alternatives, and the alternatives considered but eliminated from detailed consideration in this document.

3.1.1 Development of Reasonable Range of Alternatives

CEQA requires that an EIR describe and evaluate a range of reasonable alternatives to a Project or to the location of a Project that would feasibly attain most of the basic Project objectives and avoid or substantially lessen significant Project impacts (CEQA Guidelines section 15126.6). The alternatives to the Build Alternative considered in this EIR were developed based on information gathered during the development of the Build Alternative and during the EIR scoping process.

In developing the Build Alternative, the City has considered a range of potential actions that could meet the Project objectives. Comments received during initial public outreach were considered (see Appendix C).

Comments relating to alternatives to the Build Alternative included the following:

- Encourage complete analysis of alternatives;
- Consider a No-Walking Trail Alternative; and
- Consider reducing the amount of track removal.

3.1.2 Methods Used to Screen Alternatives

Potential alternatives were screened based on their ability to feasibly attain most of the basic Project objectives and reduce or eliminate any significant environmental impacts of the Build Alternative.

- **Meeting Project Objectives** The Project objectives are listed in the Project Description. The CEQA Guidelines state that alternatives must feasibly attain most of the basic objectives of the Project (CEQA Guidelines section 15126.6). Alternatives that did not meet the majority of the objectives were screened out and not carried forward for further evaluation in the EIR.
- **Feasibility** Alternatives that are not "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors," (per Public Resource Code Section 21061.1), were not carried forward for further evaluation in the EIR.
- Avoiding or lessening any potentially adverse environmental effect of the Build Alternative – Consistent with the CEQA Guidelines (section 15126.6), alternatives should avoid or substantially lessen one or more of the significant environmental effects of the Build Alternative. Alternatives that would not lessen or avoid a potentially significant environmental impact, were not carried forward for detailed evaluation in the EIR.

Section 3.1.3 describes the alternatives considered but eliminated from further evaluation. Section 3.2 describes the alternatives retained for further evaluation.

3.1.3 Alternatives Considered but Rejected for Further Consideration

The alternatives described below were rejected for further consideration and analysis because they failed to meet most of the basic Project objectives, were determined to be infeasible, and/or would not avoid or substantially lessen significant environmental impacts.

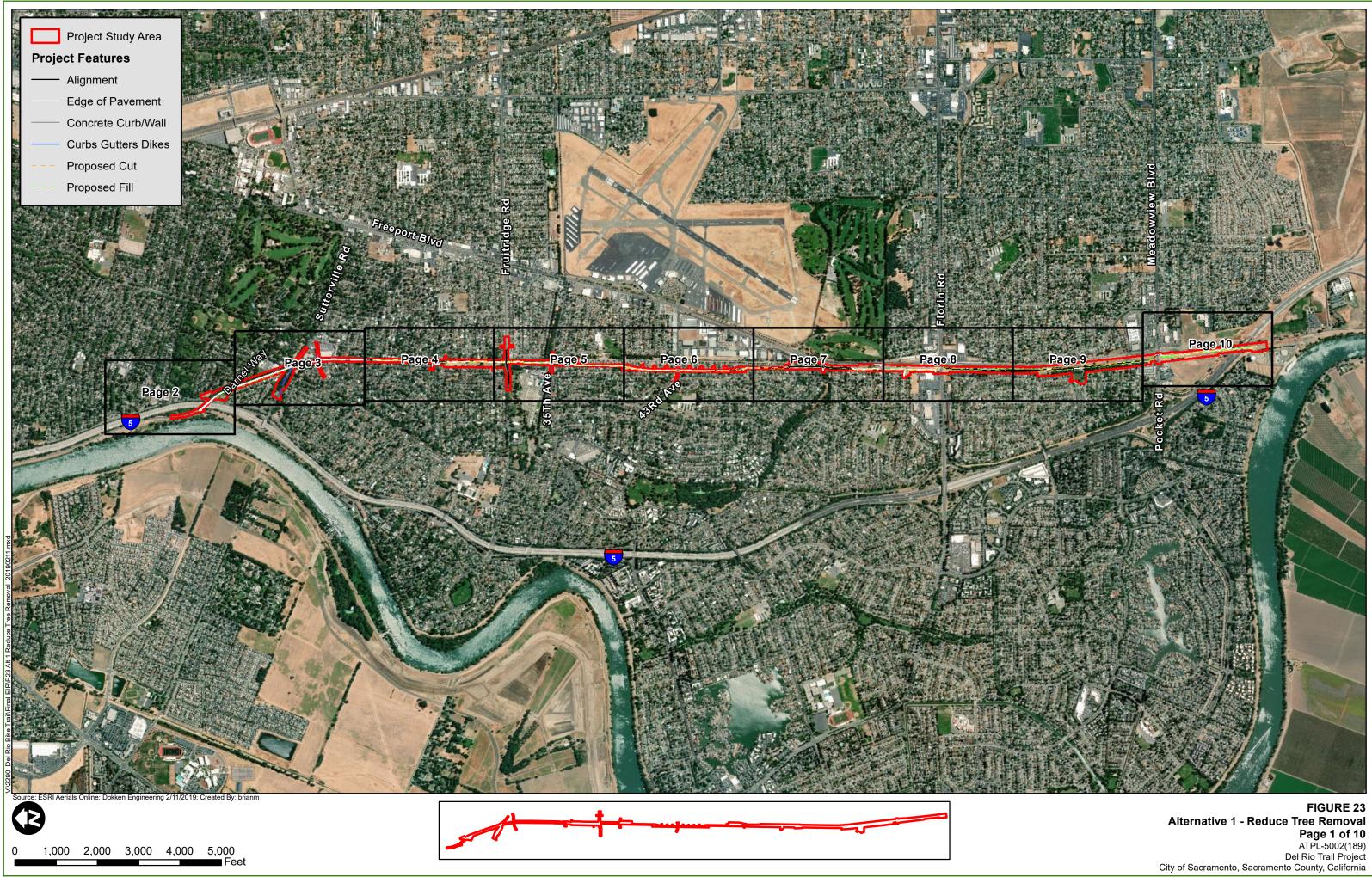
ALTERNATIVE 1 – Reduce Tree Removal

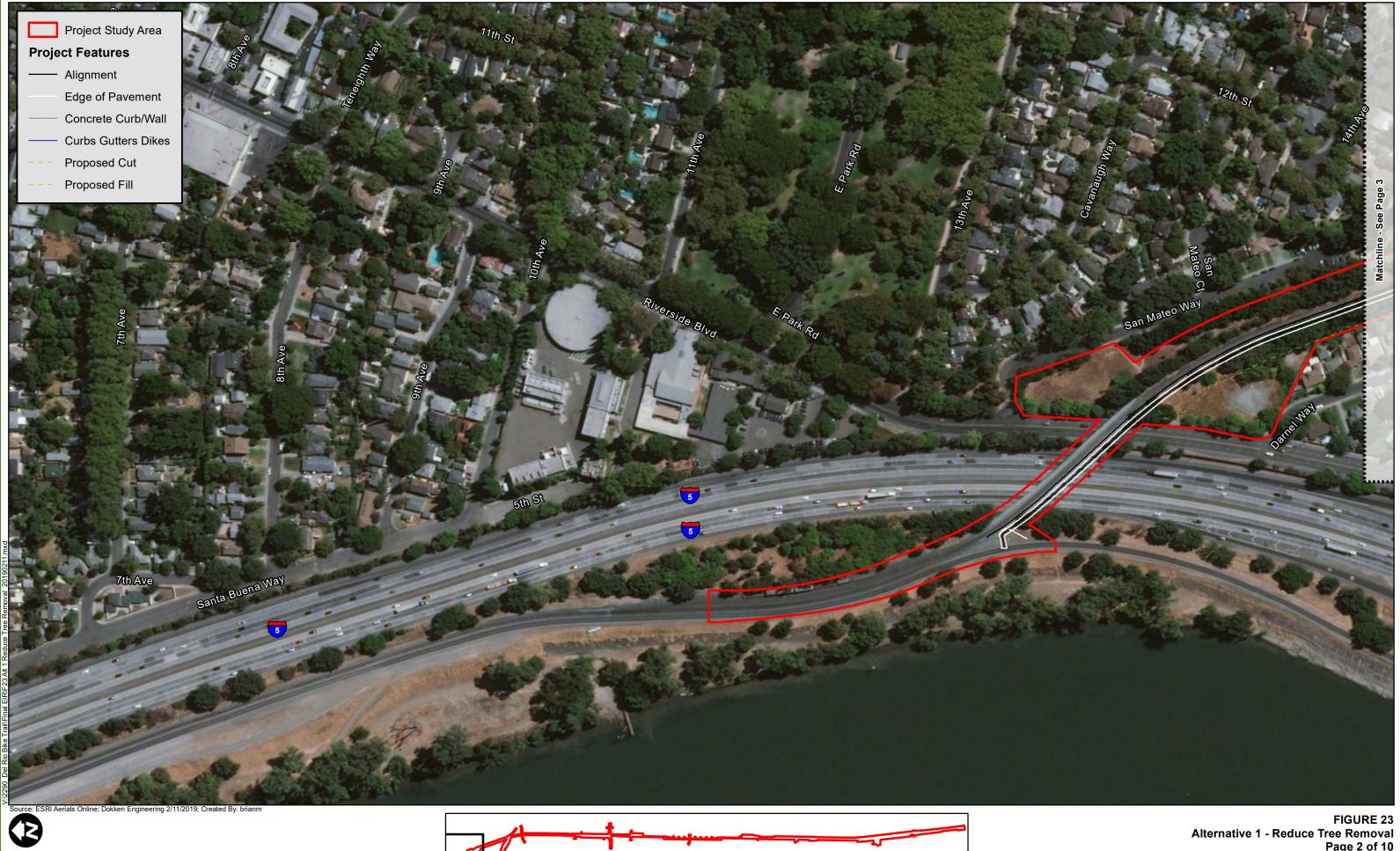
Alternative 1 was considered as a feasible alternative by the City during conceptual design and used during initial public outreach with interested stakeholders November 2017 through March 2018. The proposed alternative consists of a Class I multi-use trail (14 feet wide with 2-foot wide shoulders) with walking trail, and at-grade crossings and intersection modifications at each major arterial location (see Figure 23).

This alternative would significantly reduce the number of oak trees removed throughout the Project corridor as compared to the Build Alternative; however, this alternative would also require the removal of approximately 50 percent of the historic track in order to avoid impacts to trees.

The City received a letter on January 19, 2018, from Cheryl Marcell, President and CEO of the California State Railroad Museum Foundation. In her letter, Ms. Marcell expressed support for the Project and plans for a multi-use trail along the route of the rail corridor. However, Ms. Marcell stated concerns about the removal of the historic property's tracks, and whether the Project could be accomplished without separate walking and biking trails, which in the letter were suggested to be redundant and needlessly expensive. In response to this letter, the City revised the Project alignment which increased the number of trees removed but significantly reduced the amount of proposed track removal to approximately 2 percent. For this reason, the City has concluded that this alternative is not feasible and it is not evaluated further in the EIR.

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400 500 Feet

0 100

200 300

FIGURE 23 Alternative 1 - Reduce Tree Removal Page 2 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California



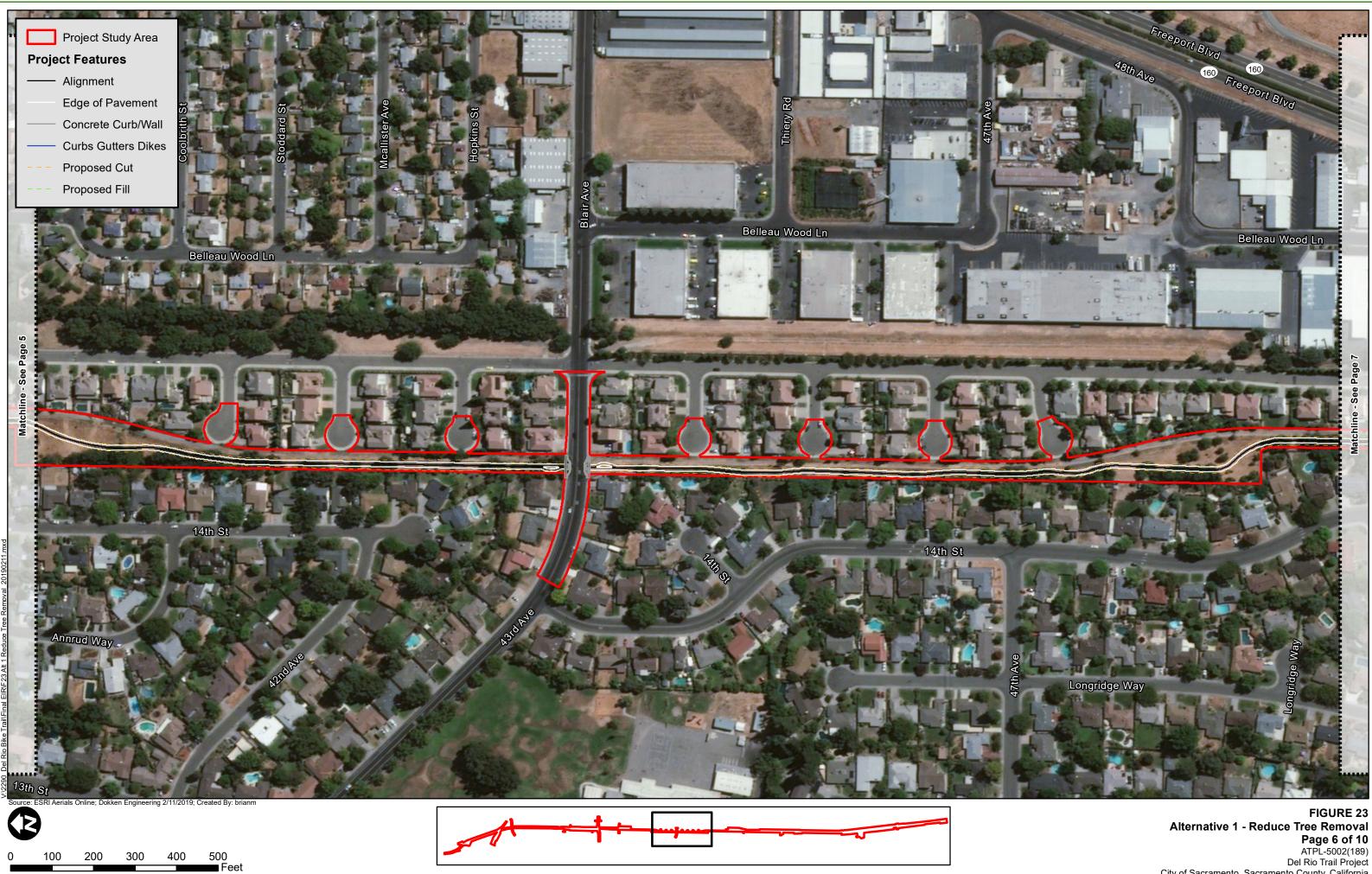
Del Rio Trail Project City of Sacramento, Sacramento County, California



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Alternative 1 - Reduce Tree Removal Page 5 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California



Alternative 1 - Reduce Tree Removal Page 6 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California



Alternative 1 - Reduce Tree Removal Page 7 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California



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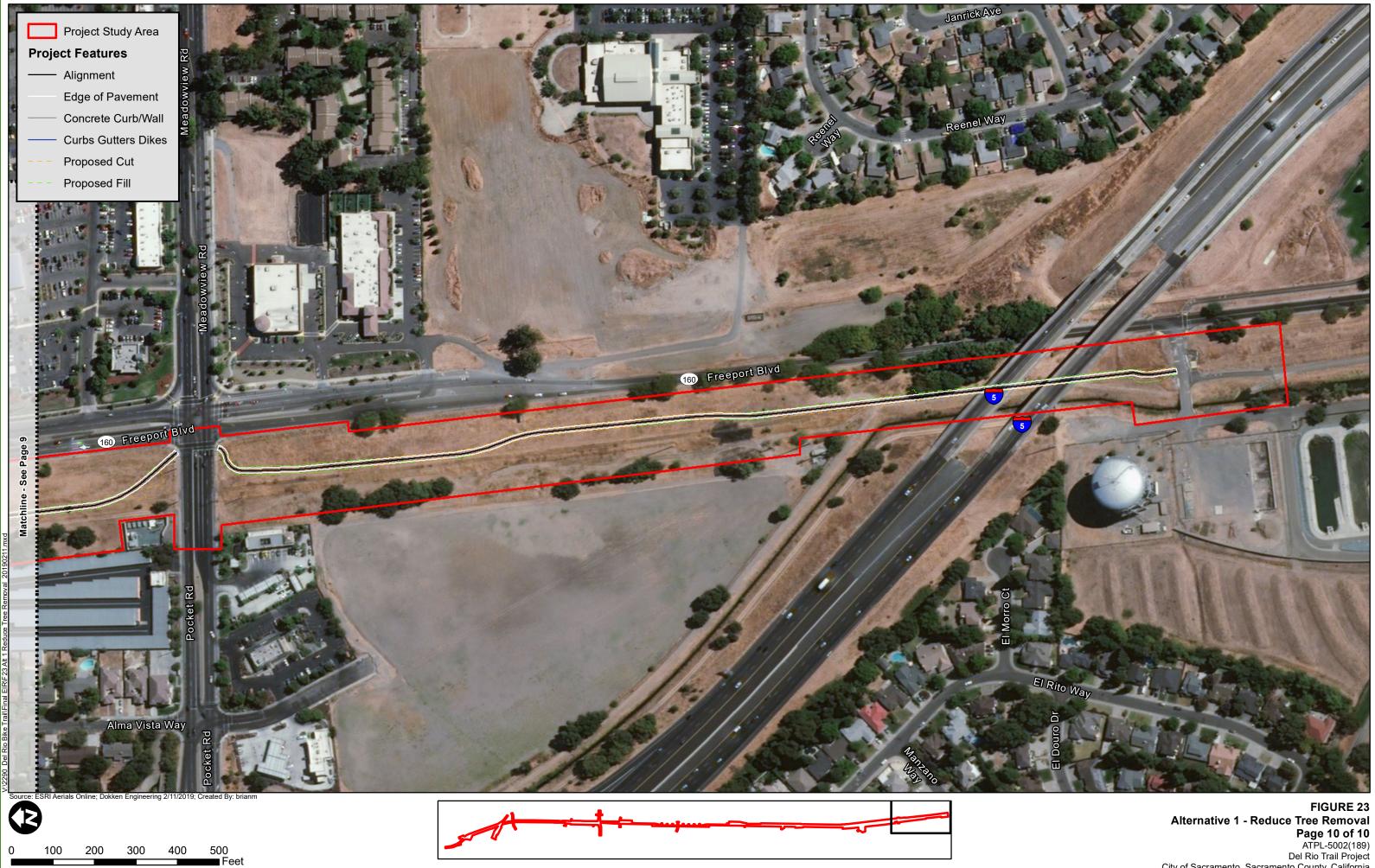


FIGURE 23 Alternative 1 - Reduce Tree Removal Page 10 of 10 ATPL-5002(189) Del Rio Trail Project City of Sacramento, Sacramento County, California

ALTERNATIVE 2 – No Walking Path

This alternative would include constructing approximately 4.8 miles of Class 1 multi-use trail (12 to 16 feet of pavement) with unpaved shoulders ranging from 2 to 3 feet without an adjacent 5 to 6-foot wide unpaved walking trail. This alternative would include at-grade crossings and intersection modifications at each location where the trail intersects a vehicular roadway. This alternative would include limited removal of existing railroad track only where necessary for safety, particularly at major arterial intersections or where the skew of the existing track against the alignment of the proposed multi-use trail will cause a safety hazard. This alternative would ultimately result in the same amount of track removal (approximately 2 percent) even without the proposed walking path. This alternative was initially rejected for further consideration and analysis because it would not avoid or substantially lessen significant environmental impacts; however, based on public comment, and in an effort to further minimize environmental impacts, Alternative 2 is now presented as the proposed Build Alternative. The Project design has been revised to remove the separate walking path. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail. As this alternative is now considered the Build Alternative, figures are included in Section 1.0 of the EIR.

ALTERNATIVE 3 – Multi-Use Trail with Separate Walking Path

Alternative 3 was developed in an effort to reduce the amount of proposed track removal of Alternative 1 to approximately 2 percent while also constructing a separate walking path (Figure 24). This was considered a feasible alternative by the City and used during public outreach with interested stakeholders March 2018 through January 2019. This alternative would include constructing approximately 4.8 miles of Class 1 multi-use trail (12 to 16 feet of pavement) with unpaved shoulders ranging from 2 to 3 feet with an adjacent 5 to 6-foot wide unpaved walking trail. This alternative would include at-grade crossings and intersection modifications at each location where the trail intersects a vehicular roadway. This alternative would include limited removal of existing railroad track only where necessary for safety, particularly at major arterial intersections or where the skew of the existing track against the alignment of the proposed multi-use trail will cause a safety hazard. Where it exists, the majority of the historic track would be retained, including its metal rails, wood ties, and gravel ballast. Where other Project constraints make it necessary for the walking path to overlap with the existing track, sections of the track would be converted to a walking trail by infilling the area between the metal rails with a traversable surface such as decomposed granite. Other portions of track would remain but not be converted to a walking path. This alternative would ultimately result in the same amount of track removal as the Build Alternative (approximately 2 percent) even with the proposed walking path; however, based on public comment during circulation of the Draft EIR, 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. This alternative is now considered infeasible and has been added to this section of the EIR as Alternative 3.

3.2 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

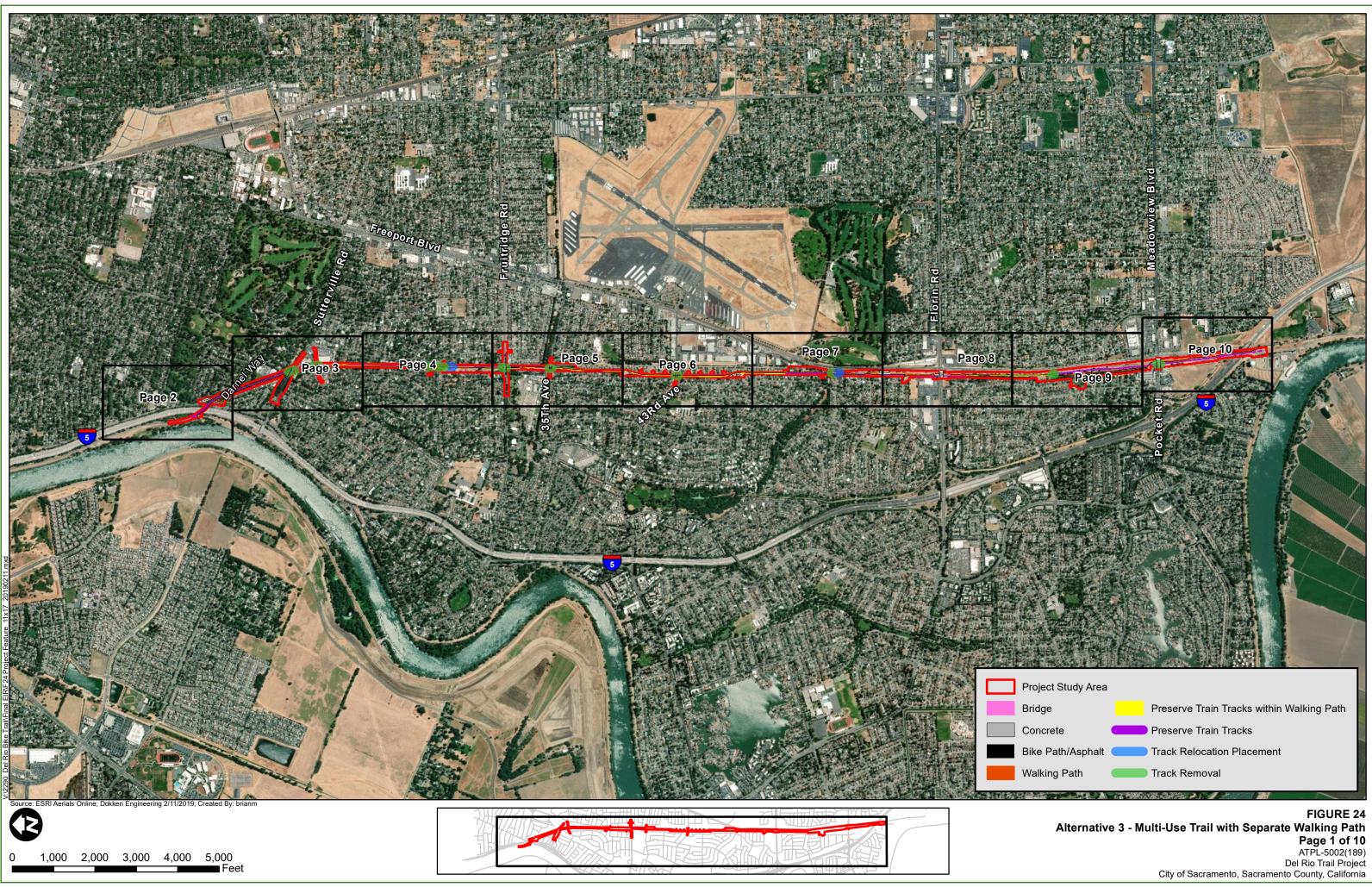
CEQA requires identification of the environmental superior alternative; that is, the alternative that has the least significant impacts on the environment.

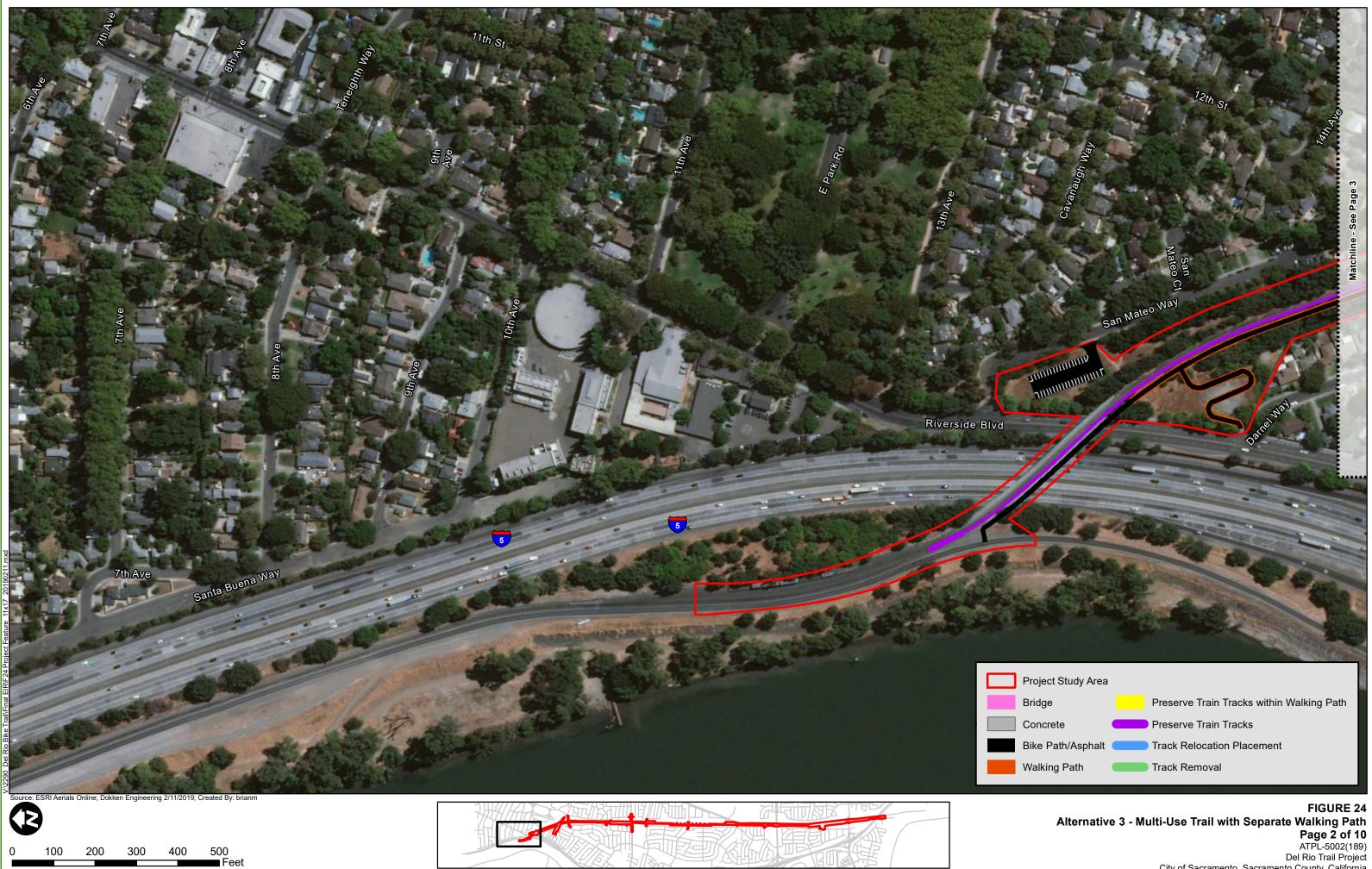
As presented in Chapter 2.0, implementation of the Build Alternative would result in less than significant environmental impacts with mitigation incorporated. As discussed in section 3.2 the No Project Alternative would have the least significant impacts on the environment; however, this alternative does not meet the Project objectives.

Therefore, because the Build Alternative would result in less environmental impacts than the other infeasible alternatives, and meets all of the basic Project objectives, it would be the environmentally superior alternative. Table 24 presents a comparison of both alternatives with respect to the impacts and the ability to meet Project objectives.

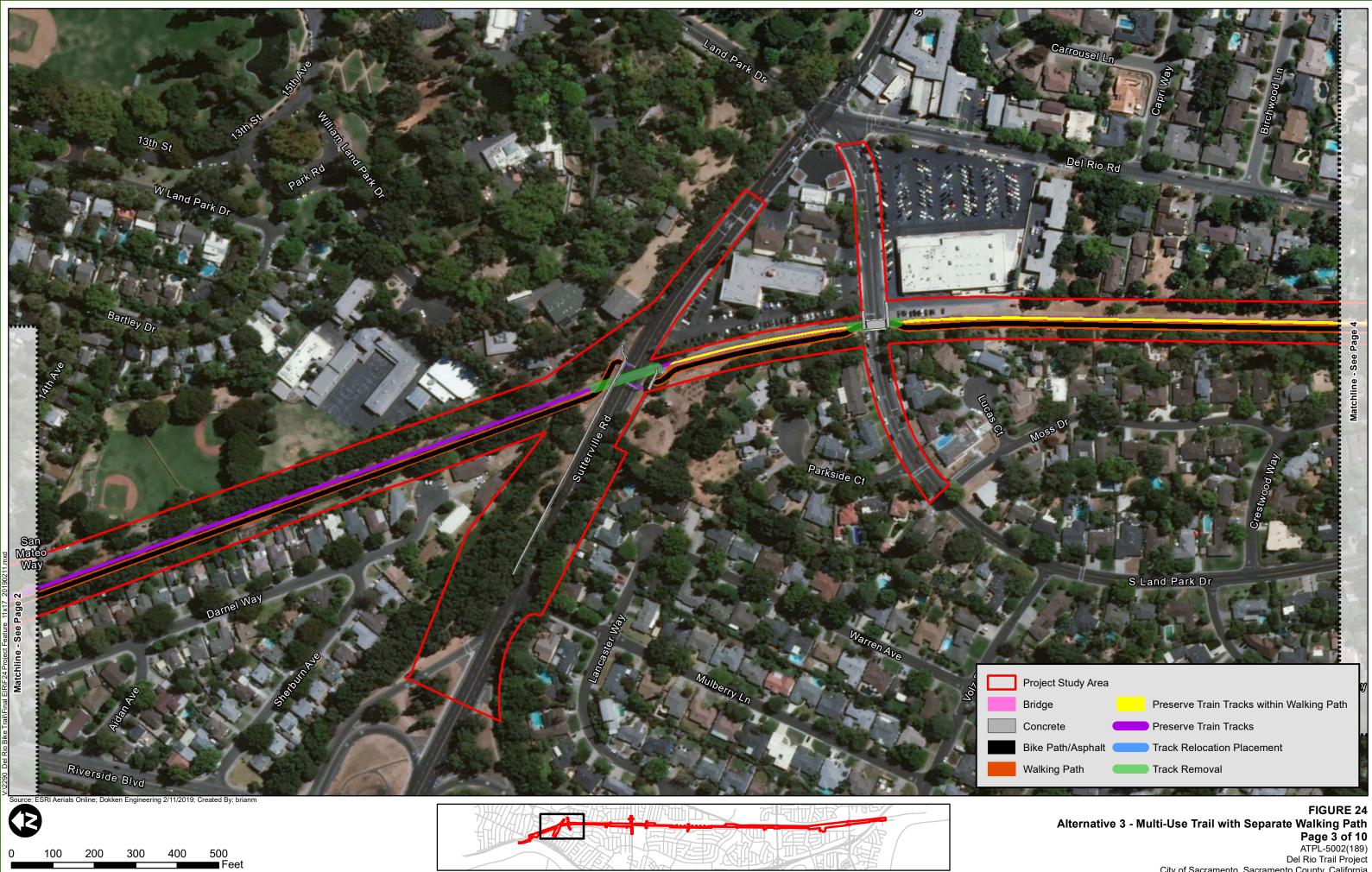
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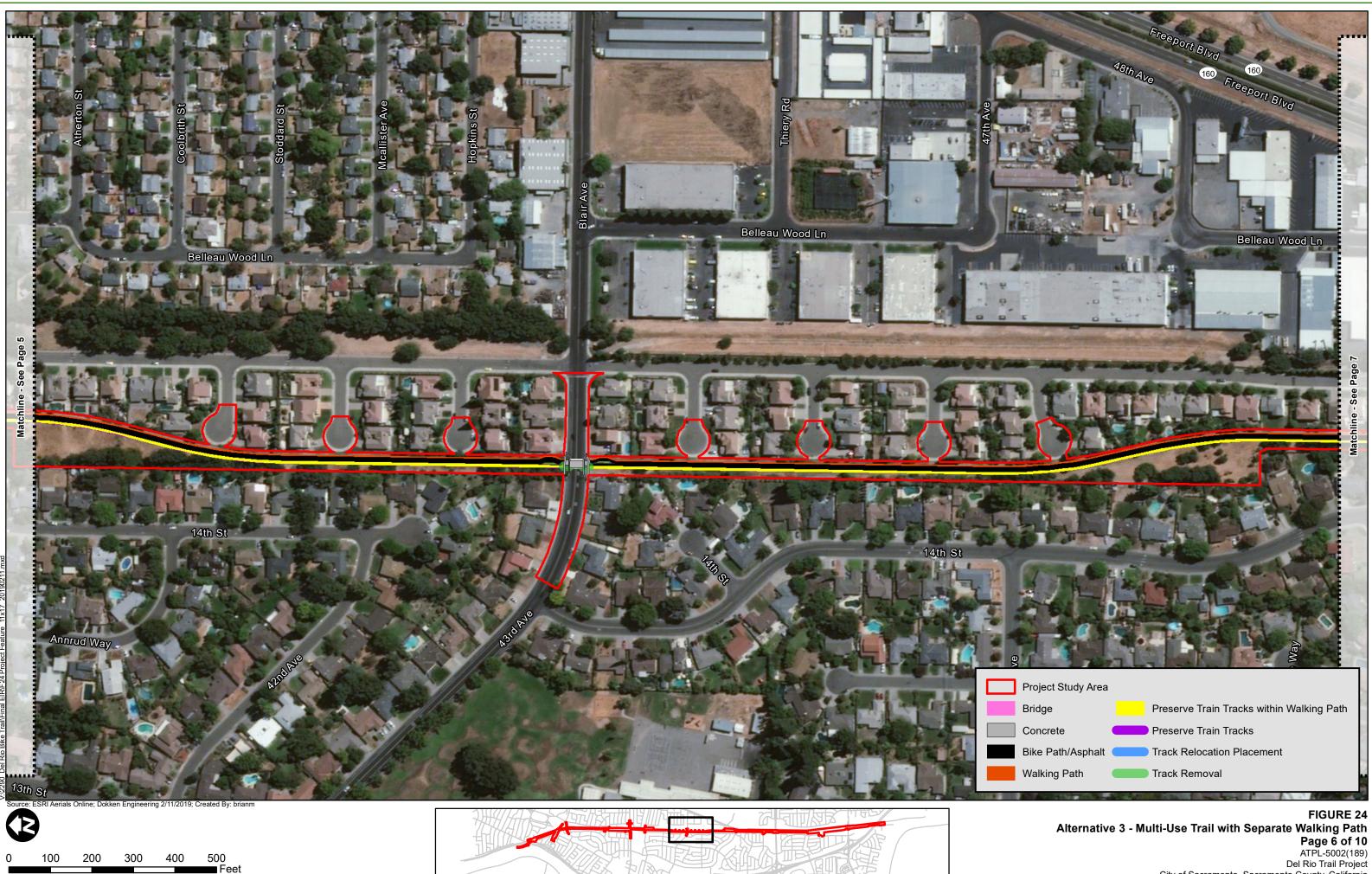
Del Rio Trail Project City of Sacramento, Sacramento County, California



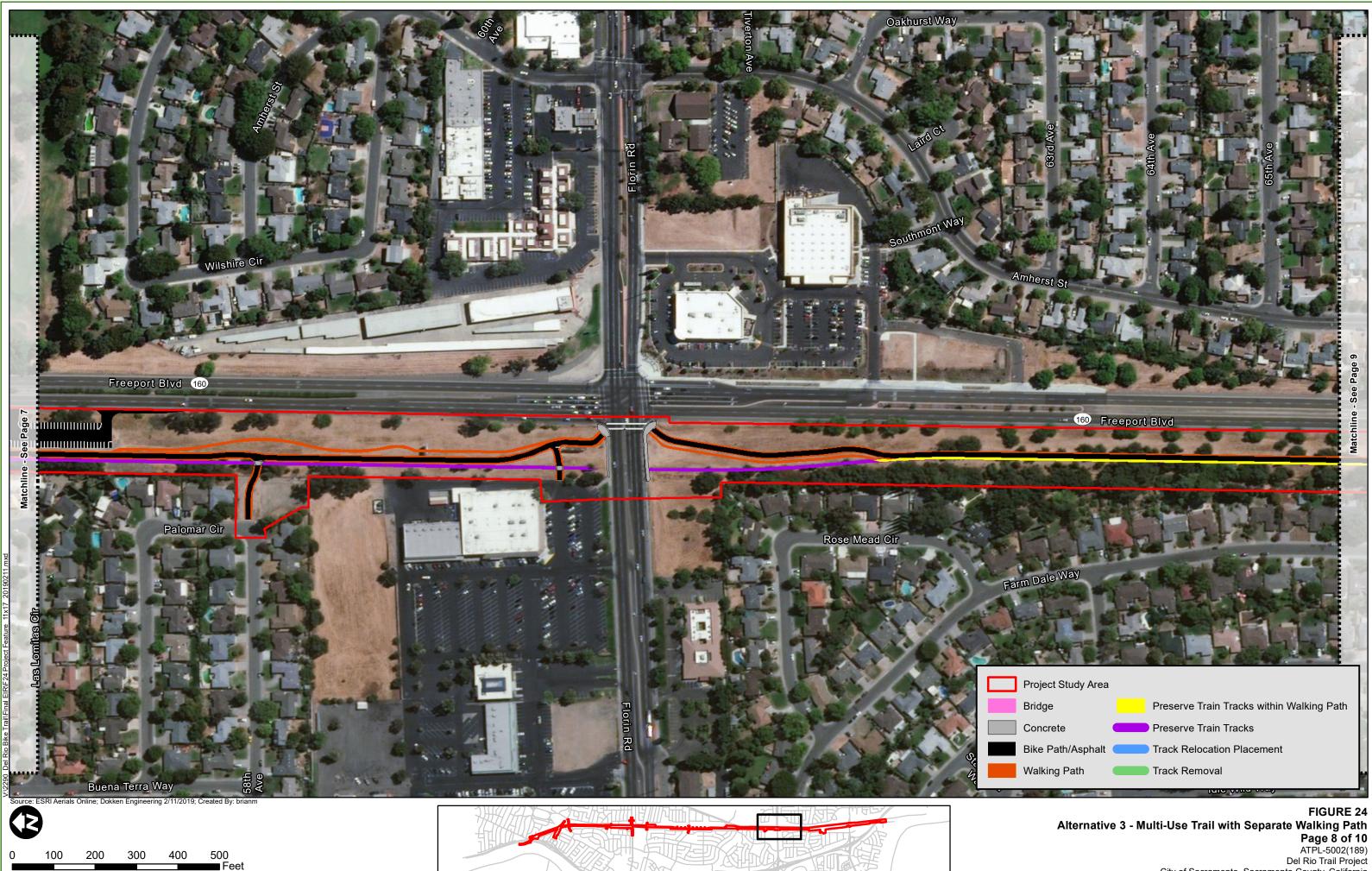
Del Rio Trail Project City of Sacramento, Sacramento County, California

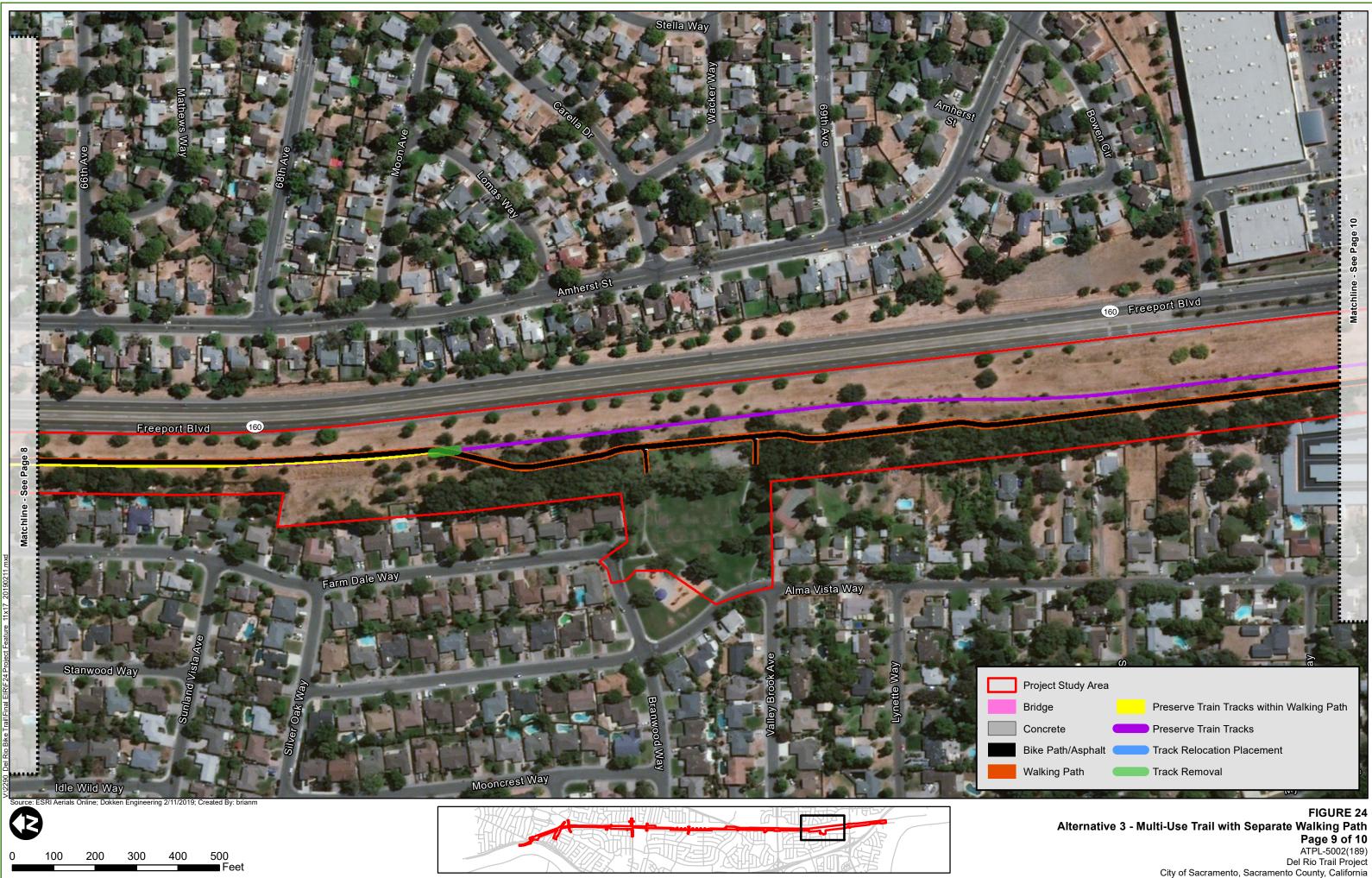












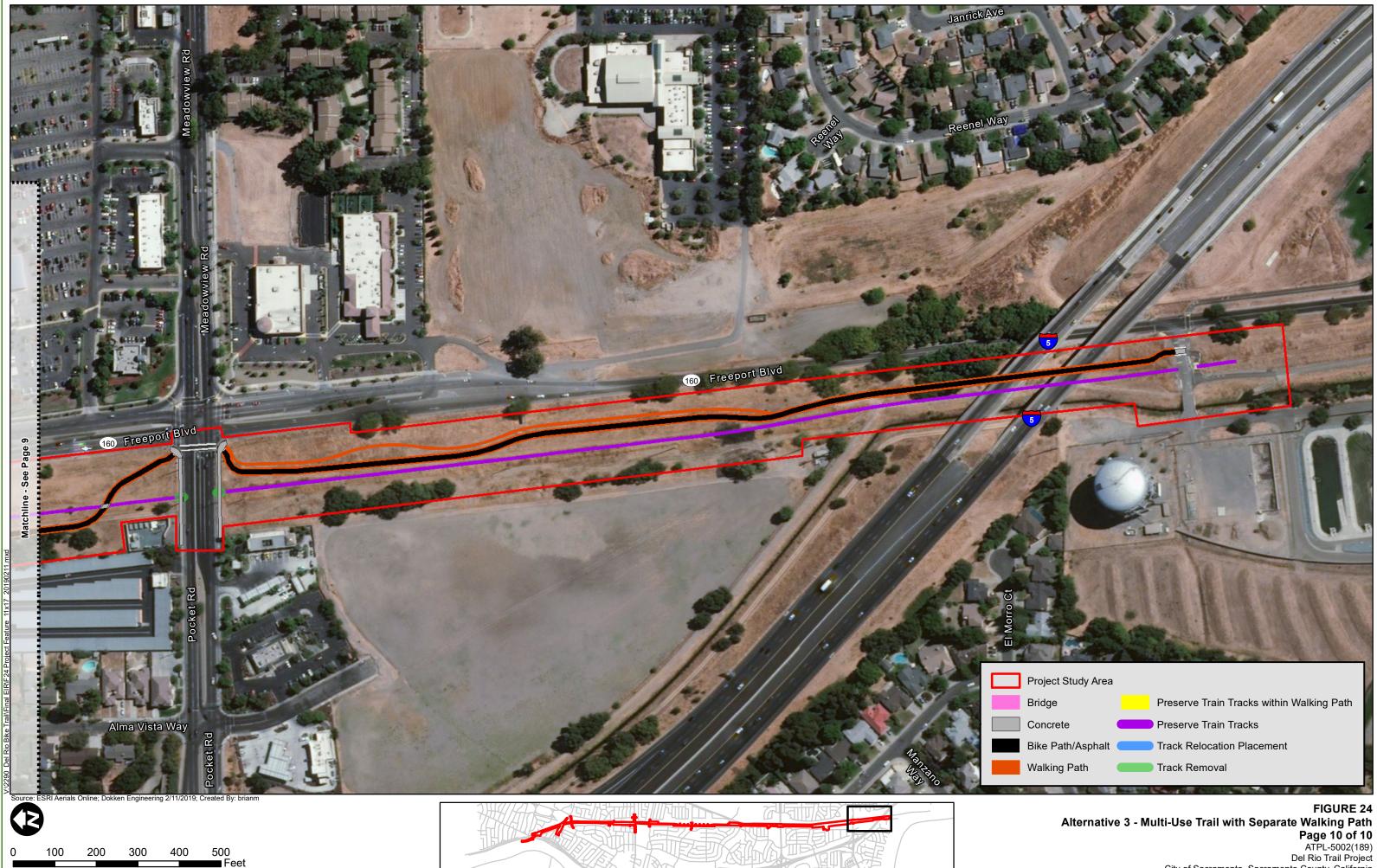


Table 24. Comparison of Environmental Impacts of the Alternatives Compared to the Build Alternative

	Build Alternative	No Project Alternative
Environmental Impacts	Less Than Significant With Mitigation	No Impact
Meets Project Objectives:		
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 utilizing public right of way and public agency parcels.	Yes	No
Connect logical origins and destinations proximate to the trail alignment by improving pedestrian and bicycle access throughout the South Land Park, Freeport Manor, Z'berg, Land Park, Meadowview, and Pocket communities	Yes	No
Provide an American's with Disabilities Act (ADA)-compliant, active transportation connection to adjacent communities throughout the south Sacramento area for pedestrians and bicyclists of all ages and abilities to access schools, retail, jobs, and recreational amenities	Yes	No

4.0 OTHER CEQA CONSIDERATIONS

This section describes required topics including growth inducing impacts, significant and unavoidable impacts, and significant irreversible environmental changes relative to the proposed Project. It provides a discussion of energy conservation as required by section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Finally, this section addresses and assesses the potential for cumulative impacts from the proposed Project in conjunction with recent past, current and reasonably foreseeable future Projects.

4.1 GROWTH INDUCING IMPACTS

CEQA (Guidelines (section 15126.2(d)) requires that an Environmental Impact Report (EIR) evaluate the growth inducing impact of a proposed action. The Guidelines describe the required growth inducement analysis as follows:

Discuss the ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this definition are public works Projects, which would remove obstacles to population growth, would tax community service facilities, or encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A Project can have the potential for direct and/or indirect growth inducement. Direct growth inducement would result if a Project involved construction of new housing which would facilitate new population in an area. Indirect growth inducement or secondary growth-inducement potential would be present if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises), or if it would involve a substantial construction effort with substantial long-term employment opportunities which could indirectly stimulate the need for additional housing and services to support the new employment demand.

Similarly, a Project could indirectly induce growth if it would remove a physical obstacle to additional growth and development, such as removing a constraint or adding a required public service. Examples of removing a physical obstacle would include construction of a new roadway into an undeveloped area or construction of a wastewater treatment plant with sufficient capacity to serve additional new development. Construction of these types of infrastructure projects cannot be considered isolated from the immediate development that they facilitate and serve. Projects that physically remove obstacles to growth, or projects that indirectly induce growth, are those that may provide a catalyst for future unrelated development in the area. The growth inducing potential of a project could also be considered significant if it fosters growth in excess of what is assumed in the local master plans and land use plans, or in projections made by regional planning agencies.

4.1.1 Direct Growth Inducement

The Build Alternative would not construct new housing, businesses, or roadways, require acquisition of private property, or create new connections to undeveloped land. 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 Build Alternative would also not create permanent employment. The Build Alternative is consistent with the City of Sacramento General Plan as the Build Alternative will continue to be zoned for Parks and Recreation, and the Project would not change the zoning designation of adjacent areas. Development of the site as proposed would alter the existing landscape, but the Project site has been designated for Recreation in the 2035 General Plan and the proposed development is consistent with these planning designations. The City Bikeway Master Plan also shows a continuous non-motorized trail system along the southern city limits (see Figure 23).

4.1.2 Indirect Growth Inducement

The Build Alternative would not establish new permanent employment opportunities or involve a substantial construction effort with substantial long-term employment opportunities that could indirectly stimulate the need for additional housing and services to support the new employment demand. Construction of the Project would last less than one year and would not require additional housing and/or services for workers. The Build Alternative would not directly or indirectly induce growth or remove an obstacle to growth, would not require or result in the need for new or expanded water or wastewater treatment facilities, and would not increase population. No growth inducing effects would occur.

4.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines section 15126(b) requires an EIR to "describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the Project is being proposed, notwithstanding their effect, should be described."

Section 2.0 of this EIR provides a description of the potential environmental impacts of the Build Alternative and recommends mitigation measures to reduce impacts to a less than significant level, where possible. After implementation of the recommended mitigation measures, all of the potentially significant impacts associated with the Build Alternative would be reduced to a less than significant level. Therefore, the Build Alternative will not have significant and unavoidable impacts.

4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines section 15126.2(c) describes irreversible environmental changes as follows:

Uses of nonrenewable resources during the initial and continued phases of a Project may be irreversible if it requires a large commitment of such resources or makes removal or nonuse thereafter unlikely. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The CEQA Guidelines refer to the need to evaluate and justify the consumption of nonrenewable resources and the extent to which the Project commits future generations to similar uses of nonrenewable resources. In addition, CEQA requires that irreversible damage that could result from an environmental accident associated with the Project be evaluated.

Construction of the Build Alternative would result in the commitment of nonrenewable natural resources used in the construction process and during operation, including gravel, petroleum products, and other materials. As discussed in Utilities and Service Systems section (Section 3.14) and Hazards and Hazardous Materials (3.7), the Build Alternative would not generate large amounts of construction waste.

Construction and operation of the Build Alternative would also result in commitment of energy resources such as fossil fuels and electricity. Direct energy used during construction and operation would involve using petroleum products and electricity to operate equipment, and indirect energy use would involve consuming energy to extract raw materials, manufacture items, and transport the goods and people necessary for construction activities. Construction-related energy consumption would be temporary and would be confined to the construction period. Nevertheless, construction and operation activities would, as with any construction Project, cause irreversible and irretrievable commitments of finite nonrenewable energy resources, such as gasoline and diesel fuel.

The Build Alternative would include all feasible control measures to improve equipment efficiency and reduce energy use as required by the SMAQMD. These measures include an Emission and Dust Control Plan that would reduce unnecessary equipment idling and other policies that would help reduce energy use and are consistent with state and local legislation and policies to conserve energy. In addition, the Build Alternative would comply with applicable Federal, State and local policies and regulations

pertaining to energy standards and would ensure that natural resources are conserved to the maximum extent possible. Therefore, due to the rate and amount of energy consumed, the Build Alternative would not result in the unnecessary, inefficient, or wasteful use of resources and energy use would be accomplished in a manner consistent with applicable laws and regulations.

Finally, construction of the Build Alternatives has the potential to result in accidental release of hazardous materials which may lead to irreversible damage. However, as stated in Section 2.7, hazardous materials used during construction would be typical of common construction activities. They would be handled by the contractor in accordance with applicable federal, State, and local regulation for hazardous substances.

4.4 ENERGY RESOURCES

This section was prepared pursuant to CEQA Guidelines sections 21100(b)(3) and 15126.4(a)(1)(c), and Appendix F of the State CEQA Guidelines. As stated in Appendix F, "[i]n order to ensure that energy implications are considered in Project decisions," an Environmental Impact Report (EIR) must discuss "the potential energy impacts of Build Alternatives, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." Appendix F, Section I states that, "Potentially significant energy implications of a Project shall be considered in an EIR to the extent relevant and applicable to the Project."

Policies 6.1.6 through 6.1.8 of the City General Plan focus on promoting the use of renewable resources, which would reduce the cumulative impacts associated with use of non-renewable energy sources. In addition, Policies 6.1.5 and 6.1.12 call for the City to work closely with utility providers and industries to promote new energy conservation technologies.

The General Plan EIR evaluated the potential impacts on energy and concluded that the effects would be less than significant (See Impacts 6.11-9 and 6.11-10). The Build Alternative would not result in any impacts not identified and evaluated in the General Plan EIR.

4.5 CUMULATIVE IMPACTS

CEQA requires an environmental impact report to include a discussion of cumulative effects of a project when the project's incremental effect is "cumulatively considerable." An effect is cumulatively considerable when it is significant in connection with the effects of past projects, the effects of other current projects and the effects of future Projects (CEQA Guidelines section 15065(a)(3)).

A "cumulative impact" is an impact that is created as a result of the combination of a project together with other projects causing related impacts. The first step in the cumulative analysis, therefore, is to identify each impact of the project and, in each case, consider whether there are other projects (past, current, future) that could have related impacts, and then to determine whether the project's contribution to the overall impact is "cumulatively considerable."

For example, a project that constructs and operates a retail center would generate a substantial number of vehicle trips once the center is completed and opened for operation, which in turn would affect road operations and conditions in the vicinity of the project site. A lead agency would be required not only to consider the effects of trips generated by the project, but also those trips in combination with other projects that might contribute vehicle trips to the same roadway system. Thus, CEQA seeks to avoid situations in which a series of small projects with relatively minor effects eventually result in far larger effects as their effects are combined.

Although the proposed Del Rio Trail is part of a larger planned connection between the existing Sacramento River Parkway and the Freeport Shores Bikeway, no cumulative effects are anticipated because environmental resources that are adversely affected by the Del Rio Trail Project would be localized and of limited extent. 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;

therefore, this impact would be temporary and not considered a cumulative effect. The removal of approximately 2 percent of the Walnut Grove Branch of the Southern Pacific Railroad track would occur as a result of the Build Alternative; however, this impact would be localized to the Del Rio Trail Project and is not considered a cumulative effect in comparison to the overall existing track in the Sacramento area.

Additionally, the Build Alternative was analyzed in terms of consistency with project's identified in the City of Sacramento General Plan and the City of Sacramento General Plan Master Environmental Impact Report. The following sections include an overview of the relevant cumulative impacts and the Build Alternative's potential to contribute to the construction related cumulative impacts. Specifically, Section 4.5.1 discusses cumulative impacts to resources in relation to their geographic scope and Table 25 identifies which method of evaluation is appropriate for each resource.

4.5.1 Geographic Scope

The geographic area that is analyzed for cumulative impacts depends on the resource being analyzed. The geographic area associated with a Build Alternative's different environmental impacts defines the boundaries of the area used for compiling the list of past, present, and probable future projects considered in the cumulative impact analysis. The geographic area varies depending on the type of environmental resource being considered (see Table 25). Also listed is the method of evaluation used to analyze cumulative impacts for each environmental resource.

Resource Topic	Geographic Area	Method of Evaluation
Aesthetics	Immediate Project Vicinity	Projects
Air Quality	Local (Toxic Air Contaminants) Air Basin (Construction Related and Mobile Sources)	Projects and Projections
Biological Resources	Immediate Project Vicinity Region	Projects
Cultural and Tribal Resources	Immediate Project Vicinity	Projects
Geology and Soils	Immediate Project Vicinity	Project
Greenhouse Gas Emissions, Climate Change, and Energy	GHG (Statewide)	Projects and Projections
Hazards and Hazardous Materials	Immediate Project Vicinity	Projects
Hydrology and Water Quality	Immediate Project Vicinity Watershed	Projects and Projections
Land Use and Planning	Immediate Project Vicinity	Projects and Projections
Noise	Immediate Project Vicinity	Projects
Public Services	Immediate Project Vicinity	Projects and Projections

Table 25. Geographic Scope of Cumulative Impact and Method of Evaluation

Recreation	Immediate Project Vicinity	Projects
	Immediate Project Vicinity Regional roadway network	Projects and Projections
Utilities and Service Systems	Immediate Project Vicinity	Projects and Projections

Notes: Projects = the use of a list of past, present, and reasonable foreseeable Projects Projections = the use of Projections contained in relevant planning documents

For those environmental resources that were evaluated based on the projections approach, the projections take into consideration future projects that are not included in the below list of related plans and projects.

4.5.2 List of Related Plans and Projects

A list of past, current, and reasonably foreseeable future projects was compiled using information from the City. The past, present and reasonably foreseeable future projects proposed by the City within or directly adjacent to the Build Alternative area, the surrounding community, or the City as a whole were identified and categorized in Table 26 below. For the purposes of this discussion, these projects that may have a cumulative effect on the resources of the Project area are often referred to as the "collective projects." These projects are described in Table 26.

Table 26. List of Collective Past, Present, and Reasonably Anticipated Future Projects Within the City

Project/	Status *	Location	Description
North Sacramento Streams, Sacramento River East Levee, Lower American River and Related Flood Improvements Project	In progress	Sacramento River Levees	The Sacramento Area Flood Control Agency (SAFCA) is proposing to implement improvements to the flood management system protecting portions of the City and County of Sacramento along the Lower American and Sacramento Rivers and their tributaries outside the Natomas Basin. The proposed improvements would reduce flood risk and bring the flood management system in the project area into compliance with applicable engineering standards established under the National Flood Insurance Program.

Garcia Bend Bike Trail	In progress	Pocket Road and Garcia Bend Park	The Garcia Bend Bike Trail would pave a 0.5-mile Class I multi-use trail that connects the northern terminus of the existing levee top trail at Garcia Bend Park to the Pocket Canal Parkway at the City's Department of Utilities Sump Station #132.
Garden Highway Bike Trail	Complete.	Garden Highway	Bike trail constructed along Garden Highway in the City of Sacramento.
I Street Bridge Replacement	In progress	I Street over the Sacramento River	The I Street Bridge Replacement Project would replace the vehicle crossing that is currently obsolete.
McKinley Village	In progress	City of Sacramento	The McKinley Village Project consists of the construction and operation of a residential development, a neighborhood recreation center, parks, and associated infrastructure on an approximately 48-acre site within the East Sacramento Community Plan Area.
2025 L Street / 2101 Capitol Avenue Mixed-Use Project	In progress	20th Street, 21st Street, L Street, Capitol Avenue	The 2025 L Street Project component would be located on the half-block north of L Street, between 20th and 21st Streets. An existing above-ground, two story parking garage and adjacent two story building at this location would be demolished, an existing surface parking lot would be removed, and a new six story, mixed use building would be constructed.

Railyards Specific Plan	In progress	City of Sacramento	Sacramento Railyards Specific Plan area is approximately 244-acres and includes the subject property, the City's Sacramento Valley Station, and the Union Pacific Railroad rail corridor. The Project proposes to subdivide lots for a variety of uses, including residential, retail, and office. The propjet also includes a medical center campus and a major sports complex.
700 Block of K Street	In progress	K street	A mixed-use development with residential units, retail/restaurant/entertain ment uses and a parking structure. The Project would renovate the majority of the existing building facades along K Street on this fully developed site.
Leisure Lane Storm Drain Improvements Project	In progress	Royal Oaks Drive/ Hwy 160 and Leisure Lane/ Exposition Blvd/ Hwy 160	Project consists of constructing a new outlet weir box north of CA- Highway 160 between the existing sewer line.
15th and 14th Street Combined Sewer Relief CIP	In Progress	City of Sacramento	The 7th Street Sewer Project includes the construction of approximately 3,200 linear feet of 72-inch, 60-inch and 48-inch diameter pipeline and appurtenances, construction of manholes and other associated work in 7th Street from P to K Street and in L Street from 7th to 9th Street.

9th Street Sewer Project	In Progress	Along 9 th street from G to L Streets	Construction of the 9th Street Sewer Project will provide additional conveyance capacity, replace deteriorated portions of the combined sewer system, add in-line storage to reduce flooding in the surrounding and upstream portions of the combined sewer system, and continue the Downtown Sewer Upsizing Project, a major component of the long-term Combined Sewer System Improvement Program.
3rd Street Sewer Relief Project	In Progress	Along 3 rd street from I to U streets	Plans and specifications for the upgrades along the 3 rd Street corridor are currently being finalized.
Yamanee Mixed-Use Project	In Progress	Intersectio n of 25th and J Streets	The Build Alternative is a new multi-story, mixed-use building southeast of the intersection of 25th and J Streets.
Oakmont of East Sacramento	In Progress	5301 F Street	The Project includes the demolition of the vacant medical office building and redevelopment of the Project site with a senior living facility.
19 J Project	In Progress	1827 and 1831 I Street	The 19J Project proposes demolition of the existing buildings on site and construction of an 11-story mixed use structure.
Accelerated Water Meter Project	In Progress	City of Sacramento	The Accelerated Water Meter Project proposes to install approximately 25,700 water meters on existing residential and commercial water service connections. The Build Alternative also involves replacement of approximately 62 miles of existing distribution and transmission mains primarily in existing City street rights-of-way.

Sutter Park Neighborhood Project	In Progress	Coloma Terrace neighborhood of East Sacramento	The Sutter Park Neighborhood Project would establish a Planned Unit Development on the property on which Sutter Memorial Hospital and its associated offices and related-care facilities are located.
Sacramento Convention Center Renovation and Expansion and the 15th/K Street Hotel Projects	Future Project	13th Street W.,15th Street E., J Street N., K Street S.; Hotel: SW corner of K and 15th Streets	The proposed Sacramento Convention Center Renovation and Expansion Project will add exhibit space, meeting rooms, new lobbies, an outdoor amphitheater, and back-of-house uses to expand and renovate the existing Convention Center. The 15th/K Street Hotel Project will construct a hotel adjacent to the Convention Center.
Twin Rivers Transit- oriented Development and Light Rail Station Project	Future Project	Richards Blvd./North 12 th Street	The City, in partnership with the Sacramento Housing and Redevelopment Agency and the Sacramento Regional Transit District, proposes implementation of the Twin Rivers Transit-Oriented Development and Light Rail Station Project. The Build Alternative would develop a mixed-income and mixed-use community comprising replacement public housing units, new market rare rental and low-income housing tax credit units, a realigned internal street network, green open space, and other community amenities on two noncontiguous but proximate properties that currently include public housing and undeveloped land.

4.5.3 Methods

The analysis below examines the cumulative impacts of the proposed Project for each of the topics that are analyzed in Chapter 2.0 of this EIR. The impacts are assessed by short term (construction) and long

term (operational) impacts of the proposed Project combined with the impacts of the past and planned projects listed in Table 26 (referred to as the collective projects).

The following objectives were set forth to analyze the short-term construction and long-term operational cumulative impacts. First, there is an assessment of whether the baseline condition, when considered with the proposed Project, entails a significant impact to any specific resource. Then, there is an assessment of whether the combined impacts of the proposed Project and the projects in Table 26 are cumulatively significant. Finally, there is a determination of whether the incremental effects of the proposed Project would 'contribute considerably' and therefore cause a cumulatively considerable effect. If so, there is also a determination of whether mitigation is feasible.

Specifically, the following objectives were set forth to analyze the short-term construction and long-term operational cumulative impacts discussed in Section 4.5.4:

- 1. Identify if the combined impacts of the proposed Project and the Projects in Table 26 are significant. If so,
- 2. Determine whether the proposed Project's incremental contribution to that significant impact are cumulatively considerable. If so,
- 3. Determine if mitigation is feasible.

Note: it is possible that even when the cumulative impact of multiple Projects is significant, the incremental contribution of the impact for the proposed Project may itself not be cumulatively considerable (California Code of Regulations [CCR] section 15064.H4, Communities for Better Environment Case Law). In this case, the Project's impact would not be cumulatively considerable.

Furthermore, a project's contribution is less than cumulatively considerable if the project implements mitigation measures designed to alleviate the cumulative impact. (CEQA Guidelines section 15130 (a)(3)).

4.5.4 Resource-Specific Cumulative Analysis

4.5.4.1 Aesthetics

What is the Geographic Scope for this resource area?

The geographic scope of the potential cumulative impacts with respect to aesthetic and visual resources is limited to areas within the physical footprint of a project area and areas adjacent to the project with views that could be changed by the proposed Project.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The area surrounding the proposed Project site is a general mix of uses (see Section 2.9 Land Use). Development of past and current projects, as well as future proposed projects, continue to alter the visual environment in and around the City. In general, the visual resource impacts of the Build Alternative and the majority of projects listed in Table 26 are site-specific and would not necessarily combine with other projects that are not in the same viewshed to create a cumulative impact. In addition, all proposed and reasonably foreseeable projects would be subject to City design and landscaping requirements to ensure that they do not degrade visual character. The appearance of the Project vicinity would not substantially change and the construction of the Build Alternative would not create significant visual impacts that would contribute to visual resource degradation in the viewshed when assessed in conjunction with other local Projects. Therefore, the Build Alternative, in conjunction with other planned Projects, would have a less-than-significant cumulative impact on aesthetic and visual resources.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

The multiple development, transportation and infrastructure projects in the region around the City would have a combined aesthetic impact; however, the Build Alternative would not cause a considerable increase to that impact, given the Build Alternative involves constructing a bike trail and no structures or roadways would be constructed.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

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; therefore, this impact would be temporary and ultimately result in a similar visual quality. The combined impacts of tree removal with other projects does not constitute a significant impact and the Build Alternative does not entail a considerable contribution to the existing baseline (Table 26); therefore, no mitigation is necessary.

Finding: None Required

4.5.4.2 Air Quality

What is the Geographic Scope for this resource area?

The geographic scope of the potential cumulative impacts with respect to air quality is on a regional level because air quality impacts are regional in nature.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The City is at nonattainment for State and Federal Ozone, State PM10 and Federal PM2.5. The collective projects listed in Table 26 would result in new air emissions. Therefore, the combined Table 26 project impacts relative to these constituents are considered significant.

Finding: Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

The SMAQMD has established operational cumulative significance thresholds for ROG and NOx, which are ozone precursors, of 85 pounds per day. Any Project emitting over 85 pounds per day of ROG or NOx would be considered a cumulatively significant impact and would require mitigation. Based on the results of the roadway emissions model, construction emissions from the Build Alternative would be below the SMAQMD significance thresholds for cumulative impacts (See Air Quality Section 2.2). Additionally, the Build Alternative Would be consistent with the City 2035 General Plan EIR air quality impact analyses. As such, cumulative impacts related to air quality emissions from development of the site consistent with General Plan Iand use designations have already been accounted for by the City 2035 General Plan EIR

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

As discussed above, the baseline cumulative contribution to air quality impacts in the region is considered significant because the City is at nonattainment for three constituents; however, the incremental addition to the problem from the Build Alternative is considered mitigated to minimal levels and thus does not contribute considerably to this existing impact; therefore, no further mitigation is required.

Finding: None Required

4.5.4.3 Biological Resources

What is the Geographic Scope for this resource area?

The geographic scope of the cumulative biological resources analysis is the Project site and adjacent surrounding areas.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The cumulative projects listed in Table 26 may result in a cumulatively significant impact to biological resources depending on site conditions and would be required to individually mitigate for impacts. When considered together, for example, the loss of potential Designated Critical Habitat (DCH) is not considered significant due to the lack of DCH in the Project area. No impacts to special status species or habitat is anticipated to occur as a result of the Del Rio Trail Project. Therefore, in general, the proposed collective Projects in Table 26 are not considered to have a cumulatively significant impact to biological resources.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

When the Build Alternative is analyzed in conjunction with other recent, current, and reasonably foreseeable projects, the potential contribution to the cumulative biological resource impact to special status species, wetlands, migratory corridors, and trees, is not considered cumulatively considerable, because the Build Alternative was designed and adjusted to avoid and minimize impacts to biological resources as much as feasible. While the elimination of large existing trees would temporarily impact the Project corridor, new trees and vegetation would be planted and allowed to grow; therefore, this impact would be temporary and ultimately result in a similar visual quality. Additionally, the City would obtain a tree permit and establish a replacement plan prior to removal of City trees pursuant to Sacramento City Ordinance 2016-0026, Chapter 12.56 City and Private Protected Trees.

The Build Alternative would not have a cumulatively considerable impact to migratory wildlife corridors, specifically migratory nesting birds, when reviewed in conjunction with other local projects. While the elimination of large existing trees would impact nesting bird habitat, new trees and vegetation would be planted and allowed to grow; therefore, this impact would be temporary. Additionally, the Build Alternative is designed to protect wildlife species such as migratory birds through implementation of pre-construction biological surveys and monitoring, as needed, to protect and avoid these biological resources.

As disclosed in the Biological Resources Section (Section 3.3), the Build Alternative would not conflict with local policies or ordinances protecting biological resources, or habitat conservation plans. Therefore, it does not contribute to a cumulatively considerable impact to such plans and policies when analyzed in conjunction with other Build Alternatives in the region (Table 26).

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to biological resources. The Build Alternative does not add a cumulatively considerable impact to the combined Build Alternative baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.4 Cultural and Tribal Resources

What is the Geographic Scope for this resource area?

The geographic scope of the cumulative cultural and tribal analysis is the Project site, adjacent surrounding areas, and the entirety of the historic rail.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The records search of the State and local registers of archaeological resources did not identify any archaeological resources (prehistoric or historic period) within the Project area. In addition, based on consultation with tribal representatives summarized in Cultural Resources and Tribal Resources (Section 2.4), no tribal cultural resources were identified within the Project area. The records search of the State and local registers of historic resources identified one resource, the historic Walnut Branch Line of the Southern Pacific Railroad track as an important historical resource designated by the Office of Historic Preservation (OHP). The Build Alternative includes limited removal of existing railroad track only where necessary for safety, particularly at major arterial intersections or where the skew of the existing track against the alignment of the proposed multi-use trail will cause a safety hazard. Where it exists, the majority of the track will be retained, including its metal rails, wood ties, and gravel ballast. Some of these portions will be incorporated into the Project through the use of landscaping, such as drought-tolerant and native plantings, as well as park-like fixtures such as benches, and trash receptacles. To avoid adverse effect, the work will comply with the Secretary of the Interior's Standards for Treatment of Historic Properties; therefore, impacts are less than significant and no mitigation is necessary. The CSO, as designated federal oversight by SHPO, concurred with this finding on October 22, 2018 (see Appendix H). Additionally, there are no other planned projects that would result in removal of the track. No cumulative effects due to impacts to the historic track are anticipated.

There is a potential for the inadvertent discovery of buried tribal cultural resources, significant paleontological resources, or human remains during the construction of the Build Alternative, but with implementation of the mitigation measures proposed in Cultural Resources and Tribal Resources (Section 2.4), it would reduce the Build Alternative's impacts to tribal cultural resources, significant paleontological resources, and human remains to less than significant.

Simultaneous construction of other projects in the Project area could potentially result in significant impacts on historic resources, archaeological resources, human remains, or tribal resources, should they be present within the Project site or the vicinity of the Project site. None of the projects listed in Table 26 have direct physical overlap with the Build Alternative and all the projects listed in Table 26 were/are required to complete CEQA environmental assessments, by law, which include a cultural resource study within the area including any areas overlapping the Build Alternative area as well as consultation with any tribes located in the area. These cultural resource studies and tribal consultations ensure proper documentation, protection, and/or mitigation of important cultural and tribal resources. Because of the CEQA requirements to assess impacts to cultural and tribal resources, there is no combined significant impact to cultural or tribal resources from these projects, and the combined impacts to cultural and tribal resources are considered less than cumulatively significant.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

Since combined impacts of the projects do not constitute a significant impact and the Build Alternative does not entail a significant impact to cultural resources (as determined by the California Department of Transportation) or tribal cultural resources, there would not be a contribution to a cumulatively considerable impact.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to cultural or tribal resources. The Build Alternative does not add a cumulatively considerable impact to the combined Project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.5 Geology and Soils

What is the Geographic Scope for this resource area?

The geographic scope of the cumulative geologic resources is the Project site and adjacent surrounding areas.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The projects in Table 26 must be constructed in compliance with seismic regulations and include soils and erosion control BMPs. There are no overlapping projects in Table 26 with the Build Alternative based on location and construction schedule that would exacerbate soil disturbances. Therefore, the potential impact to soil erosion is localized and mitigated, and not considered cumulatively significant.

Finding: Less than Cumulatively Considerable

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

Construction in a seismically-active region puts people and structures at risk from a range of earthquakerelated effects, such as surface fault rupture, strong ground shaking, and landsliding. However, as discussed in Geology and Soils (Section 2.5), the Build Alternative is not located within an area that is seismically active. Furthermore, the Build Alternative would be built to applicable California State Building Codes to further reduce risks associated with seismic activity. The Build Alternative would also entail erosion control BMPs and site restoration. Therefore, the Build Alternative's contribution to seismic hazards, erosion, and sedimentation in the region is not considered cumulatively considerable.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to geologic resources. The Build Alternative does not add a cumulatively considerable impact to the combined Project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.6 Greenhouse Gases

What is the Geographic Scope for this resource area?

The geographic scope of the potential cumulative impacts with respect to greenhouse gas emissions is on a regional level because greenhouse gas emissions impacts are regional in nature.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The analysis of greenhouse gas emissions (see Greenhouse Gas Emissions [Section 2.6]) is based on the regional impacts of climate change resulting from greenhouse gas emissions globally. Regional and local impacts to GHG emissions are a less-than-significant impact.

The reasonably foreseeable projects listed in Table 26 would result in new greenhouse gas emissions and may result in significant impacts related to greenhouse gas generation. However, all of the reasonably foreseeable Projects would be consistent with existing zoning and land use designations within the City General Plan and would be included in the City General Plan EIR. As such, cumulative impacts related to greenhouse gas generation for the Projects listed in Table 26 have already been accounted for by the City General Plan EIR and therefore not considered cumulatively significant.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

The Build Alternative would not have significant impacts related to greenhouse gas generation. The thresholds of significance analyzed within Section 3.6 for greenhouse gas impacts are cumulative in nature, taking into consideration the State's emission reduction goal per AB 32 and the California Air Resources Board's Scoping Plan. Therefore, because the Project would have less than significant greenhouse gases impact, as analyzed within Section 3.6, greenhouse gas, the Build Alternative would not generate a cumulatively considerable impact for greenhouse gases.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to greenhouse gas emissions. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.7 Hazards and Hazardous Materials

What is the Geographic Scope for this resource area?

The geographic scope of the potential cumulative impacts with respect to hazards and hazardous material is limited to the American Society for Testing and Materials (ASTM) standard of one mile area surrounding the Build Alternative.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

Hazardous materials to be used during construction are of low toxicity and would consist of fuels, oils, paints, and lubricants. Because these materials are required for operation of construction vehicles and equipment, BMPs would be implemented to reduce the potential for or exposure to accidental spills or fires involving the use of hazardous materials. Impacts from minor spills or drips would be avoided by thoroughly cleaning up minor spills as soon as they occur. While foreseeable projects have the potential to cause similar impacts, is it assumed these projects would also implement BMPs. Therefore, there would not be a significant cumulative impact.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

Hazardous materials utilized during operation include fuels, oils, and lubricants. The materials would be stored in accordance with regulatory requirements as disclosed in Section 2.7. Simultaneous construction of projects in Table 26 could also require the use of hazardous materials during construction. If these projects occurred in the immediate vicinity of the Build Alternative, they could result in a cumulatively considerable potential risk of upset. However, the projects listed in Table 26 would not occur in the same project footprint as the Build Alternative. Additionally, the Build Alternative and the projects listed in Table 26 do not have high risk of wildfires due to the highly-urbanized nature of the City. Therefore, the Build Alternative would not result in a cumulatively considerable increase in hazards.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to hazards and hazardous materials. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.8 Hydrology and Water Quality

What is the Geographic Scope for this resource area?

The geographic scope of the potential cumulative impacts with respect to hydrology and water is on a regional level because hydrology and water quality impacts are regional in nature. The geographic scope of the cumulative hydrology and water quality analysis is the vicinity of the Project site and the Sherman Lake-Sacramento River watershed.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The cumulative projects listed in Table 26 may result in a cumulatively significant impact to regional hydrologic resources if, for example, flow alterations combined to either significantly reduce or increase flows in the region's stream, rivers and canals. The Build Alternative does not entail significant proposed flow decreases or increases. Furthermore, the Build Alternative and the projects listed in Table 26 would be subject to Federal, State and local regulations designed to minimize cumulative impacts to water quality. Mitigation measures implemented in the short-term (during construction of the Build Alternative), in combination with compliance with Federal, state and local regulations, are expected to reduce potential short-term combined impacts to hydrology and water quality to a less than significant level. The mitigation measures proposed in Hydrology and Water Quality (Section 2.8) of this EIR would reduce the Build Alternative's impacts to water quality to a less- than-significant level.

The short-term impacts of the projects listed in Table 26 on hydrology and water quality are estimated to be less than significant or less than significant with mitigation incorporated. None of the construction projects are expected to occur simultaneously in the same location, and any short term cumulative impacts that would occur if that were not the case are considered to be less than significant due to the geographic separation of the projects from one another. Therefore, the Build Alternative would have a less-than-significant cumulative impact on hydrology and water quality.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

The Build Alternative would mitigate impacts to a less than significant level by avoiding impacts to hydrology and water quality and would not be cumulatively considerable given the small and localized nature of the Build Alternative and the potential impacts. Therefore, the Build Alternative would not be cumulatively considerable and would not warrant additional mitigation.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to hydrology and water quality. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.9 Land Use and Planning

What is the Geographic Scope for this resource area?

The geographic scope of the cumulative land use analysis is the Project region (City). Land use decisions are made at the City level for the Project region; therefore, the City is an appropriate geographic scope.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The projects in Table 26 could both create and alleviate growth-related impacts in the City. Residential and other development-related projects will impact regional infrastructure, including impacts to finite resources such as wastewater treatment capacity and water supply. Transportation-related projects such as the Twin Rivers Transit-oriented Development and Light Rail Station Project will alleviate impacts associated with cumulative development. Water and wastewater infrastructure construction Projects such as the McKinley Village Project, 3rd and 9th Street Sewer Relief Projects, and the Water Treatment Plants Rehabilitation Project serve to alleviate impacts to existing infrastructure associated with increased development. The proposed multi-use trail would not contribute to the combined impacts associated with the past, present, and future development projects listed in Table 26

Short-term and long-term cumulative impacts to land use as a result of the Projects listed in Table 26 would be less than significant. The cumulative infrastructure development of the Build Alternative and the past and planned projects, would not individually or cumulatively physically divide a community or communities. All projects must be developed in accordance with applicable land use plans and policies. Applicable zoning ordinances and land-use regulations would not be affected as a result of the projects listed in Table 26. As a result, the Build Alternative and the projects listed in Table 26 would have a less than significant cumulative impact.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

The combined impacts of the Projects listed in Table 26 do not constitute a significant land use impact. The Build Alternative area for the multi-use trail is classified as Parks and Recreation in the City of Sacramento 2035 General Plan and zoning code and would continue to be zoned as such. The Project would not change the zoning designation of adjacent areas. Because the Project does not create new connections to undeveloped land, no impacts to growth, economics, affordable housing, or crime would

occur. Development of the site as proposed would alter the existing landscape, but the Project site will continue to be consistent with these planning designations. The City Bikeway Master Plan also shows a continuous non-motorized trail system along the abandoned railway corridor (Figure 23). Since the Build Alternative does not have the potential to conflict with land use plans as described above, and would not incrementally contribute to the combined impact of the past, present, and future projects listed in Table 26, there would be no cumulative impact to land use.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to land use. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.10 Noise and Vibrations

What is the Geographic Scope for this resource area?

The geographic scope of the potential cumulative impacts with respect to noise is limited to areas within the physical footprint of a project area. Therefore, the area near the Project site would be the area most affected by Project activities and is considered the geographic scope for the noise analysis.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

If the construction of Projects in the region (Table 26) were to occur simultaneously when assessed in combination with the Build Alternative they could have a cumulative impact to sensitive receptors adjacent to the Build Alternative area. However, there are no overlapping project locations and/or construction schedules. The recent and proposed transportation and development projects are not within the same project vicinity as the Build Alternative, thus their noise impacts would not compound to exceed a threshold, excessively vibrate the ground, cause substantial permanent increase in ambient noise, or expose neighbors of an airstrip to additional excessive noises. Additionally, the timing of these projects located nearest to the Build Alternative are not anticipated to be constructed at the same time as the Build Alternative. Therefore, the potential cumulative impact from the projects in the region and the Build Alternative would be less than cumulatively significant.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

As discussed above, the baseline recent past, current, and reasonably foreseeable future cumulative conditions, with the addition of the Build Alternative, would not create a significant noise impact in the area, such as an increase in noise levels above local and regional thresholds. Therefore, the Build Alternative would not result in a cumulatively considerable impact.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to noise levels or vibration. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline, therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.11 Population Growth

What is the Geographic Scope for this resource area?

The geographic scope of the cumulative population growth analysis is the Project region (City). Development and economic growth decisions are made at the City level for the Project region; therefore, the City is an appropriate geographic scope.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The projects in Table 26 could both create and alleviate growth-related impacts in the City. Residential and other development-related projects will impact regional infrastructure, including impacts to finite resources such as wastewater treatment capacity and water supply. Transportation-related projects such as the Twin Rivers Transit-oriented Development and Light Rail Station Project will alleviate impacts associated with cumulative development. Water and wastewater infrastructure construction projects such as the McKinley Village Project, 3rd and 9th Street Sewer Relief Projects, and the Water Treatment Plants Rehabilitation Project serve to alleviate impacts to existing infrastructure associated with increased development. The proposed multi-use trail would not contribute to the combined impacts associated with the past, present, and future development projects listed in Table 26.

The cumulative infrastructure development of the Build Alternative and the past and planned projects, would not individually or cumulatively physically divide a community or communities. The Project would not result in the acquisition of private property or result in the displacement of people. As a result, the Build Alternative and the projects listed in Table 26 would have a less than significant cumulative impact.

Finding: Less than Cumulatively Considerable

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

The combined impacts of the projects listed in Table 26 do not constitute a significant economic or population growth impact. The Project would not change the zoning designation of adjacent areas. Because the Project does not create new connections to undeveloped land, no impacts to growth, economics, affordable housing, or crime would occur. Development of the site as proposed would alter the existing landscape, but the Project site will continue to be consistent with these planning designations. The City Bikeway Master Plan also shows a continuous non-motorized trail system along the abandoned railway corridor (Figure 23). Since the Build Alternative does not have the potential to conflict with land use plans as described above and would not incrementally contribute to the combined impact of the past, present, and future projects listed in Table 26, there would be no cumulative impact to land use.

Finding:	Less	than	Cumulatively	Considerable
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Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to population growth. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline, therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.12 Public Services

What is the Geographic Scope for this resource area?

The geographic scope of the cumulative public services analysis is the service area of each of the providers serving the Build Alternative area. These are discussed under Public Services (Section 2.11) of this document and include local fire districts, police departments, school districts and municipalities.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The potential for the projects in the region (Table 26) combined with the Build Alternative to cumulatively trigger new or larger demand on public services is considered less than cumulatively significant. This is because the Build Alternatives listed in Table 26, along with the Build Alternative, would not be constructed simultaneously and do not entail added demand for school or parks, or require the addition of large numbers of workers to move to the area. In addition, the potential heightened risk for fire (and demand on fire departments) during construction is temporary and significantly reduced through the application of standard fire prevention and control mitigation. As such, combined demand on local police, fire, schools, parks, and other public facilities is considered less than significant. In addition, the operation of the combined projects, most notably the housing development projects, could create additional demand on local facilities such as the police and fire department; however, such facility expansions (i.e. new parks, police, and fire stations) are typically part of the proposed development project environmental documents and the impacts were contemplated and disclosed. The combined projects therefore would not trigger the need for new governmental facilities for which impacts have not been contemplated.

Finding: Less than Cumulatively Considerable

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

As discussed above, the past, current and reasonably foreseeable future cumulative conditions with the addition of the Build Alternative would not create a significant impact to public services. The Build Alternative's contribution to the cumulative less than significant impact to public services is also not cumulatively considerable, as it would not cause a significant incremental increase to the demand on public services.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to public services. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.12 Recreation

What is the Geographic Scope for this resource area?

The geographic scope of the cumulative recreation analysis is the recreation facility and adjacent housing developments serving the Build Alternative.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The potential for projects in the region (Table 26) combined with the Build Alternative to increase the use and accelerate the deterioration of existing recreational facilities or trigger new or expanded recreational facilities that could have an adverse environmental impact is minimal and considered a less than significant cumulative impact. Of the past, current and reasonably foreseeable projects in the region, those that entail housing development are the most likely to increase the use of existing recreational facilities, such as neighborhood parks. However, the Build Alternative would not add to the increase created by these other projects. The proposed multi-use trail is designed to be a recreational facility in and of itself and to provide an alternative mode of transportation to other destinations, including parks; therefore, no impacts related to additional use would occur and there is no potential for cumulative impacts.

Finding: Less than Cumulatively Considerable

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

As discussed above, the past, current and reasonably foreseeable future cumulative conditions with the addition of the Build Alternative would not create a significant impact to recreation. The Build Alternative's contribution to the cumulative less than significant impact is also not cumulatively considerable. Based on the environmental setting (Section 2.13), the sensitivity of the recreation resources, and the limited extent, as well as short term construction duration, the Build Alternative would not cause a significant incremental increase to the demand on recreational resources beyond the thresholds assessed above, and, therefore, the effect would not be cumulatively considerable.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to recreational resources. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.13 Transportation and Traffic

What is the Geographic Scope for this resource area?

The geographic scope of the potential cumulative impacts with respect to transportation and traffic is limited to a quarter mile area surrounding the Build Alternative.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The Build Alternative would not have long-term effects on the existing transportation system. Implementation of a traffic control plan for temporary work within intersections during construction of the trail crossing would be implemented. In addition, the projects in the region, given their locations, do not appear to have significant overlapping access footprints that would result in a cumulatively significant impact to key highways and roads. Therefore, the potential cumulative impact to transportation and traffic from past, current and reasonably foreseeable future projects is considered less than significant.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

The Build Alternative consists of constructing a multi-use trail and would not include the construction of trip generating development roadways or other transportation infrastructure that would impact traffic. Implementation of a traffic control plan would help mitigate temporary traffic impacts where the trail crosses existing intersections. Based on the analysis in the Transportation and Traffic section (Section 2.14) and the limited Project footprint within existing roadways, the contribution of the Build Alternative to the cumulative impact to transportation and traffic resources would not cause a significant increase to the demand on these resources beyond the thresholds listed. Therefore, the impact of the Build Alternative would not be cumulatively considerable.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned Projects would not result in a significant impact to transportation and traffic resources. The Build Alternative does not add a cumulatively considerable impact to the combined Project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

4.5.4.15 Utilities and Services

What is the Geographic Scope for this resource area?

The geographic scope of the potential cumulative impacts with respect to utilities and service systems is the combined area where utility services are provided.

What is the level of significance of the Combined Impact of the proposed Project with the projects listed in the Cumulative Impact Table?

The potential for the projects in the region (Table 26) combined with the Build Alternative to cumulatively trigger new or larger demand for utilities, including stormwater facilities, is considered less than significant. This is because the Build Alternatives listed in Table 26, including the Build Alternative, would not be constructed simultaneously. In addition, the operation of the combined projects, most notable the housing development projects could create additional demand on local facilities; however, such facility expansions are typically part of the proposed development project environmental documents and their impacts were contemplated and disclosed.

Additional electricity would be required for lighting at intersections for safety. The potential for the projects in the region (Table 26) and the Build Alternative to cumulatively exceed electricity demands is considered less than significant. The development projects in the region must each individually assess and confirm the availability of electricity with SMUD prior to development.

The potential for the projects in the region (Table 26) and the Build Alternative to cumulatively exceed landfill demands is considered less than significant. Most of the projects in the region are construction, not demolition projects, and thus, do not entail significant landfill contributions. Any long-term operational waste generating sources from these projects were analyzed and disclosed within their environmental documents. Most of the solid waste in the area is transported to the Sacramento Recycling Transfer Station which is then transported to the Lockwood Landfill. The Sacramento Recycling Transfer Station has a permit capacity of 2,500 tons per day and the Lockwood Landfill does not have a maximum daily disposal limit but does have a remaining capacity of 32.5 million tons with a planned expansion in the near future. As such, both the Sacramento Recycling Transfer Station and the Lockwood Landfill have the available capacity for the current and future regional projects (Table 26) and would not trigger the

expansion of solid waste handling. Therefore, this potential cumulative impact is considered less than significant.

In addition, the combination of projects in the region (Table 26) and the Build Alternative would not trigger an unplanned exceedance of wastewater capacity or treatment requirements, non-compliance with solid waste or wastewater regulations, or result in the lack of sufficient water supply. The Build Alternative would not generate wastewater. The development projects in the region must each individually assess and confirm the availability of wastewater capacity and water supply prior to development. The local municipalities and water purveyors develop and expand water and wastewater treatment in accordance with General, Specific, and Master Plans. As such, the combined projects in conjunction with the Build Alternative would not exceed water or wastewater treatment capacity and, therefore, there would be a less than significant cumulative impact to public services and utilities.

Finding: Less than Cumulatively Significant

Is the proposed Project's Incremental Contribution to the Combined Impact Cumulatively Considerable?

As discussed above, the baseline recent past, current and reasonably foreseeable future cumulative conditions with the addition of Build Alternative would not create a significant impact to public services and utilities. The Build Alternative's contribution to the cumulative less than significant impact to utilities is also not cumulatively considerable, as it would not cause a significant incremental increase to the demand on utilities beyond the thresholds assessed above.

Finding: Less than Cumulatively Considerable

Is Mitigation Feasible?

The combined impacts of planned projects would not result in a significant impact to utilities. The Build Alternative does not add a cumulatively considerable impact to the combined project baseline. Therefore, no mitigation is necessary for cumulative impacts.

Finding: None Required

5.0 CEQA PREPARERS

As required by the California Environmental Quality Act (CEQA), this chapter identifies the preparers of this Environmental Impact Report (EIR).

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Appendix A California Environmental Quality Act Checklist

The following checklist identifies physical, biological, social, and economic factors that might be affected by the proposed Project. The California Environmental Quality Act impact levels include "potentially significant impact," "less than significant impact with mitigation," "less than significant impact," and "no impact."

Supporting documentation of all California Environmental Quality Act checklist determinations is provided in Chapter 2 of this Environmental Impact Report. Discussion of all impacts and mitigation measures is under the appropriate topic headings in Chapter 2.

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

\boxtimes Aesthetics Agriculture Resources \boxtimes Air Quality \boxtimes **Biological Resources** \boxtimes Cultural Resources \boxtimes Geology/Soils Greenhouse Gas Hazards & Hazardous \boxtimes \boxtimes Hydrology/Water Quality Emissions Materials Land Use/Planning **Mineral Resources** \boxtimes Noise \boxtimes **Public Services** \square Population/Housing Recreation Mandatory Findings of \boxtimes \boxtimes Transportation/ Traffic Utilities/Service Systems Significance

The proposed Project would have potentially significant impacts to:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
I. AESTHETICS: Would the Project:				
a) Have a substantial adverse effect on a scenic vista				\square
b) Substantially damage scenic resources, including,		\boxtimes		
but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway				
c) Substantially degrade the existing visual character		\boxtimes		
or quality of the site and its surroundings?				
d) Create a new source of substantial light or glare		\boxtimes		
which would adversely affect day or nighttime views in the area?				
II. AGRICULTURE AND FOREST RESOURCES: In				
determining whether impacts to agricultural				
resources are significant environmental effects, lead				
agencies may refer to the California Agricultural				
Land Evaluation and Site Assessment Model (1997)				
prepared by the California Dept. of Conservation as				
an optional model to use in assessing impacts on				
agriculture and farmland. In determining whether				
impacts to forest resources, including timberland, are significant environmental effects, lead agencies				
may refer to information compiled by the California				
Department of Forestry and Fire Protection regarding				
the state's inventory of forest land, including the				
Forest and Range Assessment Project and the				
Forest Legacy Assessment Project; and the forest				
carbon measurement methodology provided in				
Forest Protocols adopted by the California Air				
Resources Board. Would the Project:		[
a) Convert Prime Farmland, Unique Farmland, or				\boxtimes
Farmland of Statewide Importance (Farmland), as				
shown on the maps prepared pursuant to the				
Farmland Mapping and Monitoring Program of the				
California Resources Agency, to non-agricultural use?				
b) Conflict with existing zoning for agricultural use,				\boxtimes
or a Williamson Act contract?				
c) Conflict with existing zoning for, or cause				\boxtimes
rezoning of, forest land (as defined in Public				
Resources Code section 12220(g)), timberland (as				
defined by Public Resources Code section 4526), or				
timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				
d) Result in the loss of forest land or conversion of				\square
forest land to non-forest use?				
e) Involve other changes in the existing environment				\square
which, due to their location or nature, could result in				ت
conversion of Farmland, to non-agricultural use or				
conversion of forest land to non-forest use?				

	Potentially Significant Impact	ignificant Significant Sign		No Impact
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?		\square		
b) Violate any air quality standard or contribute substantially to an existing or Projected air quality violation?				
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non- attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?		\boxtimes		
d) Expose sensitive receptors to substantial pollutant concentrations?		\square		
e) Create objectionable odors affecting a substantial number of people?				
IV. BIOLOGICAL RESOURCES: Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?				
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the Project:		Wittigation		
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				
d) Disturb any human remains, including those interred outside of formal cemeteries?		\square		
e) Have the potential to cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or 2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.?				
VI. GEOLOGY AND SOILS: Would the Project: a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?			\boxtimes	
ii) Strong seismic ground shaking?			\boxtimes	
iii) Seismic-related ground failure, including liquefaction?				
iv) Landslides? b) Result in substantial soil erosion or the loss of topsoil?				

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				
VII. GREENHOUSE GAS EMISSIONS: Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				
VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			\boxtimes	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e) For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard for people residing or working in the Project area?				
f) For a Project within the vicinity of a private airstrip, would the Project result in a safety hazard for people residing or working in the Project area?				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				

	Significant Significant Sig		ficant Significant ith Impact ation	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				
IX. HYDROLOGY AND WATER QUALITY: Would the Project:				
a) Violate any water quality standards or waste discharge requirements?				
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?				
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				
f) Otherwise substantially degrade water quality?		\square		
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				
j) Inundation by seiche, tsunami, or mudflow				

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING: Would the Project:		winigation		
				N7
a) Physically divide an established community?				
b)Conflict with any applicable land use plan, policy,				\boxtimes
or regulation of an agency with jurisdiction over the				
Project (including, but not limited to the general plan,				
specific plan, local coastal program, or zoning				
ordinance) adopted for the purpose of avoiding or				
mitigating an environmental effect?				
c) Conflict with any applicable habitat conservation				\boxtimes
plan or natural community conservation plan?				
	Potentially	Less Than	Less Than	No
	Significant	Significant	Significant	Impact
	Impact	with	Impact	•
		Mitigation		
XI. MINERAL RESOURCES: Would the Project:				
a) Result in the loss of availability of a known mineral				\square
resource that would be of value to the region and the				
residents of the state?				
b) Result in the loss of availability of a locally-				\square
important mineral resource recovery site delineated				
on a local general plan, specific plan or other land				
use plan?				
XII. NOISE: Would the Project result in:				
a) Exposure of persons to or generation of noise		\square		
levels in excess of standards established in the local				
general plan or noise ordinance, or applicable				
standards of other agencies?				
b) Exposure of persons to or generation of excessive		\square		
groundborne vibration or groundborne noise levels?				
c) A substantial permanent increase in ambient noise			\square	
levels in the Project vicinity above levels existing				
without the Project?				
d) A substantial temporary or periodic increase in		\boxtimes		
ambient noise levels in the Project vicinity above				
levels existing without the Project?				
e) For a Project located within an airport land use			\square	
plan or, where such a plan has not been adopted,				
within two miles of a public airport or public use				
airport, would the Project expose people residing or				
working in the Project area to excessive noise				
levels?				
) For a Project within the vicinity of a private airstrip,			\square	
would the Project expose people residing or working				
in the Project area to excessive noise levels?				
		l		

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING: Would the Project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				\boxtimes
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				
XIV. PUBLIC SERVICES: a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?		\square		
Police protection?				
Schools?				
Parks?				
Other public facilities?				
XV. RECREATION:				
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				\boxtimes
c) Potential to result in substantial interference to park recreation?			\boxtimes	
d) Potential to result in permanent displacement of existing recreational facilities or substantial permanent decrease in access to existing recreational facilities or opportunities?				

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC: Would the Project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				\boxtimes
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e) Result in inadequate emergency access? f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				
XVII. UTILITIES AND SERVICE SYSTEMS: Would the Project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				
d) Potential to have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?				
e) Potential to result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?				

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs?				
g) Comply with federal, state, and local statutes and regulations related to solid waste?				
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?				
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				

Appendix B Mitigation Monitoring and Reporting Plan

The City of Sacramento as the lead agency under the California Environmental Quality Act (CEQA), has developed a Mitigation Monitoring and Reporting Plan for the Del Rio Trail Project. This list is designed to ensure that the mitigation measures identified in the Project's Environmental Impact Report are implemented prior to, during, and after completion of construction.

The following table contains a list of the mitigation measures that are proposed to reduce potential environmental impacts for the Del Rio Trail Project. For each measure, the table identifies timing of implementation, the party responsible for implementation, completion check box, and space for initials.

The City of Sacramento is responsible for ensuring the implementation of all measures in this Mitigation Monitoring and Reporting Plan.

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
Aesth	etics/Visual Resources				
AES-1: The City shall comply with City Code section 12.56.040 by establishing a replacement plan for any City trees that must be removed. The City shall replace the trees removed during project construction by replanting a minimum of 700 trees. If additional trees can be incorporated into the project design and planting plan above 700, the City shall plant where feasible. The exact number of trees and locations shall be determined during final design. The tree removal and replacement plan is subject to approval by the City Council.	Prior to construction / During construction	City			
AES-2: Lighting design will comply with local standards in order to minimize light and glare impacts on surrounding sensitive users. Lighting fixtures will be selected to minimize light pollution into the adjacent residences and skies, while taking into account safety needs.	Prior to construction	City			
AES-3:To minimize impacts to views of visual resources, aesthetic treatments and/or landscaping will be incorporated during Final Design in coordination with the City.	During construction	City			
AES-4: A Landscape Architect will design planting plans to revegetate exposed slopes and other disturbed soil areas.	During construction	City			
	Air Quality				
AQ-1: Sacramento Metropolitan Air Quality Management District's Rule 403 - Fugitive Dust would be followed. The general requirements of Rule 403 are: 301 Limitations: A person shall take every reasonable precaution not to cause or allow the emissions of fugitive dust from being airborne beyond the property line from which the emission originates, from any construction, handling or storage activity, or any wrecking, excavation, grading, clearing of land or solid waste disposal operation. Reasonable precautions shall include, but are not limited to:	During construction	Resident Engineer			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
301.1 Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the construction of roadways or the clearing of land. 301.2 Application of asphalt, oil, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts; 301.3 Other means approved by the Air Pollution Control Officer.					
 AQ-2: Basic Construction Emission Control Practices: The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel powered equipment. The California Air Resources Board enforces the idling limitations. Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site. Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies. Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated. 	During construction	Resident Engineer			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
Bio	ological Resources				
BIO-1: Prior to initiating construction, an ESA fence will be installed around any elderberry shrubs with driplines extending within 20 feet, as feasible, of the Project impact area. All areas to be avoided during construction activities will be fenced and/or flagged as close to construction limits as feasible. The ESA will be positioned as far from the shrubs as practicable and will be installed under the direction of the Project biologist.	Prior to construction/ During construction	City / Resident Engineer			
BIO-2: In accordance with the <i>Swainson's Hawk Technical Advisory Committee Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley</i> (2000), protocol level surveys will be conducted during the appropriate survey periods immediately prior to construction to determine presence/absence of the species in areas in proximity to the Sacramento River. If Swainson's hawk nests are discovered within 0.5 mile of the Project area, appropriate protective measures will be developed in coordination with CDFW.	Prior to construction	City			
 BIO-3: If possible, vegetation removal should occur outside the nesting bird season (February 15th –September 1st). If vegetation removal is to take place during the nesting season, a preconstruction 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. A minimum 100-foot no-disturbance buffer for songbirds and a 250-foot buffer for raptors must be established around any active nests. The contractor must immediately stop work in the nesting area until the appropriate buffer is established and is prohibited from conducting work that could disturb the birds (as determined by the Project biologist and in coordination with wildlife agencies) in the buffer area until a qualified biologist determines the young have fledged. 	Prior to construction	City/Resident Engineer			
BIO-4: If construction on the existing bridge is planned to occur	Prior to construction	City/Resident			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
during the swallow nesting season, measures will be taken to avoid impacts to migratory swallows. To protect migratory swallows, unoccupied nests must be removed from the existing bridge structure and swallow exclusionary devices installed prior to the nesting season (February 15 th – September 1 st). During the nesting season, the bridge structure must be maintained through the active removal of partially constructed nests. Swallows can complete nest construction in approximately 3 days. After a nest is completed, it can no longer be removed until an approved biologist has determined that all birds have fledged, and the nest is no longer being used.		Engineer			
 BIO-5: Contract specifications will include the following BMPs, where applicable, to reduce erosion during construction: Implementation of the Project will require approval of a site-specific Storm Water Pollution Prevention Plan (SWPPP) that would implement effective measures to protect water quality, which may include a hazardous spill prevention plan and additional erosion prevention techniques; Existing vegetation will be protected in place where feasible to provide an effective form of erosion and sediment control; and As a permanent BMP, slope roughening by equipment tracking will be implemented to create unevenness on bare soil. Surface roughening reduces erosion potential by decreasing runoff velocities, trapping sediment, and increasing water infiltration. 	Prior to construction/ During construction	Resident Engineer			
BIO-6: The contractor must dispose of all food-related trash in closed containers and must remove it from the Project area each day during construction. Construction personnel must not feed or attract wildlife to the Project area.	During construction	Resident Engineer			
BIO-7: The Project biologist will periodically inspect the construction areas to ensure elderberry shrubs within the ESA	During construction	City			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
limits are not disturbed.					
BIO-8: The Project biologist must conduct pre-construction clearance surveys of the areas of disturbance prior to ground disturbance. Should a sensitive species be observed, the Project will mark the area as an ESA and coordinate with the appropriate wildlife agencies.	Prior to construction	City			
BIO-9: All construction personnel will attend an environmental awareness training before conducing work in the Project area. The training program will notify construction personnel of the sensitive biological resources occurring within the Project area, including the VELB, their legal status, and penalties for not complying with the conditions of any permits issued for the Build Alternative. During the environmental awareness training, construction personnel will also be briefed on the need to avoid damage to the elderberry host plant and the possible penalties for not complying with these requirements.	Prior to construction/During construction	City/Resident Engineer			
BIO-10: If any wildlife is encountered during the course of construction, said wildlife must be allowed to leave the construction area unharmed.	During construction	Resident Engineer			
BIO-11: No insecticides, herbicides, fertilizers, or other chemicals that might harm the beetle or its host plant will be used within 100 feet of elderberry shrubs.	During construction	Resident Engineer			
BIO-12: Plastic mono-filament netting (erosion control matting) or similar material that could trap wildlife must not be used. Acceptable substitutes include jute, coconut coir matting, or tackified hydroseeding compounds.	During construction	Resident Engineer			
BIO-13: To conform to water quality requirements, the SWPPP must include the following:Vehicle maintenance, staging and storing equipment,	Prior to construction/ During construction	City / Resident Engineer			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
 materials, fuels, lubricants, solvents, and other possible contaminants must be a minimum of 50 feet from surface waters. Any necessary equipment washing must occur where the water cannot flow into surface waters. The Project specifications will require the contractor to operate under an approved spill prevention and clean-up plan; Construction equipment will not be operated in flowing water; Construction work must be conducted according to sitespecific construction plans that minimize the potential for sediment input to surface waters; Raw cement, concrete or concrete washings, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to aquatic life must be prevented from contaminating the soil or entering surface waters; Equipment used in and around surface waters must be in good working order and free of dripping or leaking contaminants; and Any concrete rubble, asphalt, or other debris from construction must be taken to an approved disposal site. 					
BIO-14 : Should a special status plant species be observed within or immediately adjacent to the Project area, ESA fencing (orange construction barrier fencing) will be installed around special status plant populations, where feasible.	Prior to construction/During construction	City/Resident Engineer			
BIO-15: Prior to arrival at the Project site and prior to leaving the Project site, construction equipment that may contain invasive plants and/or seeds will be cleaned to reduce the spreading of noxious weeds.	Prior to Construction/During construction	Resident Engineer			
BIO-16: All hydroseed and plant mixes must consist of a biologist- approved plant palette seed mix of native and sterile species.	During construction	Resident Engineer			
BIO-17: The contractor must not apply rodenticide or herbicide within the Project area during construction.	During construction	Resident Engineer			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
BIO-18: Prior to the start of construction activities, the Project limits in proximity to jurisdictional waters must be marked with high visibility Environmentally Sensitive Area (ESA) fencing or staking to ensure construction will not further encroach into jurisdictional waters.	Prior to construction	City/Resident Engineer			
BIO-19: Prior to tree removal, the Project biologist will conduct surveys to determine if "bat habitat trees" exist within the Project footprint. Potential bat habitat trees typically are mature trees with features such as open cavities, crevices, or loose bark. Potential "bat habitat trees" that will be removed as a result of the Project (including utility relocation), must be removed between September 1st and March 31 st outside of the maternity season (April 1 st – August 31 st). Additional specific tree removal procedures (including potential exclusions, removal of bark et.) will be determined on a case-by-case basis by the Project biologist. Potential bat habitat trees not requiring removal will be protected in place with ESA fencing.	Prior to construction	City			
Cultural Reso	urces/Tribal Cultural Resou	urces			
CUL-1 : The City shall implement the Caltrans approved Action Plan during each stage of the undertaking that will be required to ensure the work complies with the Rehabilitation Standards, as well as the responsible parties for ensuring that each task is completed.	Prior to construction/During construction	City			
CUL-2: Additional archaeological survey would be needed if Project limits are extended beyond the present survey limits.	Prior to construction	City			
CUL-3 : The United Auburn Indian Community of Auburn Rancheria and the Ione Band of Miwok Indians shall be notified 7 days in advance of each phase of ground disturbance as part of the Project.	Prior to construction	City			
CUL-4: A cultural resources awareness training program will be developed which will include relevant information regarding cultural resources; respectful treatment of cultural resources;	Prior to construction/During construction	City/Resident Engineer			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
applicable regulations; consequences of violating regulations; applicable avoidance and minimization measures; and the protocols and notification chain of command/points of contact should a cultural resource be discovered. The program will also underscore the requirement for confidentiality and culturally- appropriate treatment of any cultural. Cultural resource awareness training will be provided to all construction crew working on-site throughout the duration of the Project.					
CUL-5 : If previously unidentified archaeological materials are unearthed during construction, all work shall be halted within 100 feet of the discovery until a qualified archaeologist can assess the significance of the find. Should the archaeological resource be Native American in origin, the United Auburn Indian Community of Auburn Rancheria, the Ione Band of Miwok Indians, the Buena Vista Rancheria, and the T'si-Akim Maidu shall be contacted and consulted on the discovery. Work shall not resume until the archaeologist, Caltrans District 3, the City, and if the resource is Native American in origin, the United Auburn Indian Community of Auburn Rancheria, the Ione Band of Miwok Indians, the Buena Vista Rancheria, and the T'si-Akim Maidu have determined the significance of the resource and appropriate mitigation, if necessary.	During construction	City/Resident Engineer			
CUL-6 : Section 5097.94 of the Public Resources Code and Section 7050.5 of the California Health and Safety Code protect Native American burials, skeletal remains and grave goods, regardless of age and provide method and means for the appropriate handling of such remains. If human remains are encountered, work should halt in that vicinity and the county coroner should be notified immediately. At the same time, an archaeologist should be contacted to evaluate the situation. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of such identification. CEQA and 43 CFR 10.3 details steps to be taken if human burials are of Native American origin.	During construction	City/Resident Engineer			
CUL-7: If previously unidentified Native American cultural resources are unearthed during construction, all work shall be halted within 100 feet of the discovery and the United Auburn					

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
Indian Community of Auburn Rancheria, shall be contacted and consulted on the discovery to assist the City and the City designated archaeologist on determining the significance of the discovery. Should the resource be determined a TCR, then the UAIC shall provide recommendations for further evaluation and/or treatment, as necessary, within 48 hours. The City will document these recommendations in their records. After review and consultation, the City will determine the most appropriate and respectful action and will document justification for the final action in their files.					
Hazaro	s and Hazardous Waste	11			
HAZ-1: The contractor shall prepare a Spill Prevention, Control, and Countermeasure Program (SPCCP) prior to the commencement of construction activities. The SPCP shall include information on the nature of all hazardous materials that shall be used on-site. The SPCP shall also include information regarding proper handling of hazardous materials, and clean-up procedures in the event of an accidental release. The phone number of the agency overseeing hazardous materials and toxic clean-up shall be provided in the SPCCP.	Prior to construction/During construction	Resident Engineer			
HAZ-2: Additional testing for arsenic on each side of boring B2 shall occur prior to construction. Should arsenic concentrations exceed the range of naturally occurring concentrations, the City and Contractor shall follow the appropriate protocol for soil disposal and handling. If stained soil or other evidence of contamination are encountered during construction of the trail, a qualified environmental consultant should observe and collect samples for analysis to determine if further action is warranted.	Prior to construction	City			
Hydro	logy and Water Quality	11			
WQ-1: The Build Alternative will implement all feasible Low Impact Development (LID) BMPs and follow the Central Valley	During construction	Resident Engineer			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
Region Phase I MS4 NPDES Permit (R5-2016-0040) for long-term, post-construction stormwater runoff.					
WQ-2: The Build Alternative will require a National Pollution Discharge Elimination System (NPDES) General Construction Permit for Discharges of storm water associated with construction activities (Construction General Permit 2012-0006-DWQ). As part of this Permit requirement, a SWPPP shall be prepared prior to construction consistent with the requirements of the RWQCB. This SWPPP will incorporate all applicable BMPs to ensure that adequate measures are taken during construction to minimize impacts to water quality.	Prior to Construction	City/ Resident Engineer			
 WQ-3: The SWPPP must include the following: Vehicle maintenance, staging and storing equipment, materials, fuels, lubricants, solvents, and other possible contaminants must be a minimum of 50 feet from surface waters. Any necessary equipment washing must occur where the water cannot flow into surface waters. The Project specifications will require the contractor to operate under an approved spill prevention and clean-up plan; Construction equipment will not be operated in flowing water; Construction work must be conducted according to site-specific construction plans that minimize the potential for sediment input to surface waters; Raw cement, concrete or concrete washings, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to aquatic life must be prevented from 	During construction	Resident Engineer			

Task and Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
 contaminating the soil or entering surface waters; Equipment used in and around surface waters must be in good working order and free of dripping or leaking contaminants; and, Any concrete, rubble, asphalt or other debris from construction must be taken to an approved disposal site. 					
NOI-1: The following noise control measures will be incorporated	loise and Vibration	1			[
 into the contract documents for construction of the Project: Construction activity that occurs outside the exempt hours of the day (7am to 6pm from Monday through Saturday, and 9am to 6pm on Sundays) that exceeds the 50-dBA daytime standard or 45-dBA nighttime standard must obtain the proper variances as outlined in Sections 8.68.250 and 8.68.260 of the City of Sacramento Noise Ordinance. Construction equipment and vehicles should be equipped with properly operating mufflers according to the manufacturers' recommendations. Air compressors and pneumatic equipment should be equipped with shrouds or shields. An internal combustion engine will not be operated on the job site without the appropriate muffler. The use of loud sound signals shall be avoided in favor of light warnings except those required by 	During Construction	Resident Engineer			

Task an	d Brief Description	Timing	Responsible Party	Completed	Initials	Notes (optional)
	safety laws for the protection of personnel.					
	Tran	sportation and Traffic				
TRA-1:	Temporary impacts to traffic flow as a result of construction activities would be minimized through construction phasing and signage and a traffic control plan.	Prior to Construction/During Construction	City/Resident Engineer			
TRA-2:	Emergency public services, local law enforcement agencies, and local businesses will be notified of the Build Alternative and any planned partial insersection closures. This notice shall occur at least one month before construction begins.	Prior to construction	City			

Appendix C Notice of Preparation Public Comments

In accordance with the CEQA Guidelines, the City distributed a Notice of Preparation (NOP) of a Draft EIR for the proposed Project on June 8, 2018 and gave the public an opportunity to provide comment on the scope of the analysis that should be included in the Draft EIR. The NOP comment period closed on July 9, 2018. The comments received by the City on the NOP were considered in the preparation of the Draft EIR and Final EIR, and are included in this Appendix. The following concerns regarding the proposed Project were raised during the public comment period of the NOP and are addressed within the following sections of this EIR:

Public Comment Topic	Draft EIR Section
Oak Tree and Vegetation Removal	2.1 Aestheics and Visual Resources and 2.3
	Biological Resources
Biological Resources	2.3 Biological Resources
Cultural and/or Historic Resources	2.4 Cultural Resources and Tribal Cultural
	Resources
Hazards	2.7 Hazards and Hazardous Materials
Water Quality	2.8 Hydrology and Water Quality
Right of Way	2.11 Population and Housing
Crime	2.12 Public Services
Utilities	2.15 Utilities and Service Systems
Consider Other Alternatives	3.0 Alternatives
Growth Inducing Impacts	4.1 Growth Inducing Impacts
Significant and Unavoidable Impacts	4.2 Significant and Unavoidable Impacts



June 20, 2018

Tom Buford, Manager, EPS City of Sacramento, Community Development Dept. 300 Richards Blvd., 3rd Floor Sacramento, CA 95811

RE: Del Rio Trail Project Input

Mr. Buford,

Our campus abuts the proposed Del Rio Trail (DRT) at Assessor's Parcel 017-0010-049 in the area between Riverside Boulevard and Sutterville Road and north of the proposed trail. Along the bottom of the current rail levee there is **some** fencing separating DRT property from our school parcel 017-0010-021. Our concern with the new proposed use centers on school safety. We request that, prior to any repurposing of this rail line, the fencing be extended along the entire shared parcel line so that trail users would not have open access to our property.

Currently, and for many years prior, this particular area of our property has been used by Land Park Little League and is the site of the Dooley Field diamonds. Preventing open access from the trail to the property is paramount to the safety of our campus and to the little league users and their improvements.

I have included a parcel map that identifies the shared property line. I would like to meet with you or your representative out at this site so we can explore the possible solutions to our concerns for this proposed use. I look forward to hearing from your office in this regard.

Working Together,

Rènee Malaki, Associate Principal

3920 West Land Park Drive, Sacramento, CA 95822 (916) 448-5663 Fax (916) 448-1465 www.hs-ps.com



STATE OF CALIFORNIA GOVERNOR'S OFFICE of PLANNING AND RESEARCH



EDMUND G. BROWN JR. Governor

June 8, 2018

COMMUNITY DEVELOPMENTALEX DEPARTMENT

Notice of Preparation

JUN 1 3 2018

RECEIVED

To: Reviewing Agencies

Re: Del Rio Trail Project SCH# 2018062009

Attached for your review and comment is the Notice of Preparation (NOP) for the Del Rio Trail Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

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

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerel hyan

Scott Morgan Director, State Clearinghouse

Attachments cc: Lead Agency

> 1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov



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

July 2, 2018

Submitted via email

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

Re: Notice of Preparation of an Environmental Impact Report for the Del Rio Trail Project

The Board of Directors of Preservation Sacramento wishes to provide comment regarding this Environmental Impact Report. The project has the potential to affect an identified historic resource, specifically the Walnut Grove Branch of the Southern Pacific Railroad, also known as the Southern Pacific Railroad. This property was determined eligible for listing in the National Register of Historic Places as a result of environmental review occurring in 1991 (Army Corps of Engineers evaluation performed by PAR Environmental Services.) This determination was re-verified in 2007 by the Army Corps of Engineers during a subsequent process. Thus, the effects of this project on an identified historic resource should be considered in the evaluation.

Our Board has met with representatives of the California State Railroad Museum Foundation, South Land Park Neighborhood Association and other stakeholders. Per this interaction, it is our understanding that the current version of the project retains 98% of the existing tracks. Mitigation for the loss of historic resources should be proportional to that loss; greater removal of rails and other resources means greater mitigation measures should be taken. The project design should utilize the Secretary of the Interior's Standards for the Treatment of Historic Properties as its guiding principles. Also, we recommend listing the railroad's right-of-way as a City of Sacramento historic district in order to aid in the interpretation and preservation of this historic resource.

Sincerely,

William Burg, President, Preservation Sacramento Board of Directors

NOC Continued

Project Description

Del Rio Trail Project

The project begins approximately 0.4 mile south of Pocket Road near the Freeport Water Tower adjacent to the I-5 bridge over Freeport Boulevard, and extends approximately 4.5 miles north along the abandoned railway corridor within the City of Sacramento. At the southern entry, the trail would connect directly to the newly constructed Freeport Shores Trail and the South Sacramento Parkway West Trail. The route would then cross at Meadowview-Pocket Road and continue north through the South Land Park neighborhood towards William Land Park and the Sacramento River Parkway. North of Sutterville Road, the trail connects to the Sacramento River Parkway via two alignments: west along Sutterville Road with Class 2 bike lanes, and northwest along the existing railway corridor.

Permanent right-of-way acquisitions and temporary construction easements are needed where the trail passes through Sacramento Regional Transit and state-owned parcels along the trail.

This project is federally funded through the Active Transportation Program grant and therefore requires compliance with both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). The lead agency for CEQA compliance is the City; the federal lead agency for NEPA compliance is Caltrans.

Powering forward. Together.



Sent Via E-Mail

July 9, 2018

Tom Buford City of Sacramento Environmental Planning Services 400 Richards Blvd., 3rd Floor Sacramento, CA 95811 tbuford@cityofsacramento.org

Subject: Del Rio Trail Project / K15165100 / Notice of Preparation

Dear Mr. Buford:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation of an Environmental Impact Report (NOP) for the Del Rio Trail Project (Project, SCH K15165100). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the Project NOP will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - <u>https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services</u>
 - <u>https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way</u>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery

SMUD would like to offer the following project specific comments:

- SMUD has existing distribution (12kV) and sub-transmission (69kV) facilities within the Del Rio Trail Project area that will need to be maintained if areas are developed/redeveloped. Should any facilities need to be relocated as a result of the project, the associated environmental impacts should be included within the cumulative impacts analysis.
- SMUD maintains a high pressure gas main approximately .50 miles south of the Project area.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this NOP. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Rob Ferrera, at <u>rob.ferrera@smud.org</u> or 916.732.6676.

Sincerely,

nicou Ton

Nicole Goi Regional & Local Government Affairs Sacramento Municipal Utility District 6301 S Street, Mail Stop A313 Sacramento, CA 95817 nicole.goi@smud.org

Cc: Rob Ferrera



10060 Goethe Road Sacramento, CA 95827-3553 Tel 916.876.6000 Fax 916.876.6160 www.sacsewer.com

July 9, 2018

Tom Buford City of Sacramento, Community Development Department Environmental Planning Division 300 Richards Boulevard, 3rd Floor Sacramento, CA 95811

Subject: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Del Rio Trail Project

Dear Mr. Buford:

The Sacramento Area Sewer District (SASD) has reviewed the NOP of an EIR for the Del Rio Trail Project and have following comments.

It is noted that the City of Sacramento proposed to construct 4.5 miles of Class 1 multi-use trail along the abandoned railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road. The proposed Del Rio Trail Project consists of a Class I multi-use trail (12 to 16 feet of pavement with unpaved shoulders ranging from 2 to 3 feet) and when feasible, an adjacent 5 to 6-foot wide unpaved walking trail. The Del Rio Trail would include at-grade crossings and intersection modifications at each location where the trail intersects a vehicular roadway.

The subject property is outside the boundaries of SASD but within the Urban Service Boundary and Sacramento Regional County Sanitation District (Regional San) boundaries. Regional San will provide ultimate conveyance and treatment of the sewer generated from this site, but the Sacramento City Utilities Department's comments will be required for local sewage service concerns.

If you have any questions regarding these comments, please call me at 916-876-6336 or Dillon Miele at 916-876-6480.

Sincerely,

Yadira Lewis

Yadira Lewis SASD Development Services

Board of Directors Representing: County of Sacramento | City of C

County of Sacramento | City of Citrus Heights City of Elk Grove | City of Folsom City of Rancho Cordova | City of Sacramento Prabhakar Somavarapu District Engineer

Rosemary Clark Director of Operations Christoph Dobson Director of Policy & Planning David O'Toole Director of Internal Services www.sacsewer.com

Joseph Maestretti Chief Einancial Officer

Nicole Coleman Public Affairs Manager PUBLIC UTILITIES COMMISSION 180 PROMENADE CIRCLE, SUITE 115 SACRAMENTO, CA 95834

June 26, 2018

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

Re: Notice of Preparation Del Rio Trail Project SCH# 2018062009



RECEIVED

Dear Mr. Buford:

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway- rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings in California. The Commission's Rail Crossings and Engineering Branch (RCEB) have received the Notice of Preparation (NOP) for the proposed Del Rio Trail Project from the State Clearinghouse.

In the NOP, the City of Sacramento (City) proposes to construct 4.5 miles of Class 1 multi-use trail along the old Sacramento Southern Railroad right-of-way from just south of Pocket Road north to Sutterville Road where it will connect to the Sacramento River Parkway via bicycle lanes on Sutterville Road and the rail bridge over Interstate 5.

For any trail work south of the South Land Park Drive railroad crossing (CPUC# 093-3.60, DOT#914553X) the City shall file a Commission Form G to record any railroad track removal including the old crossings at Pocket Road, Florin Road, 43rd Avenue, 35th Avenue, and Del Rio Road. The procedure for filing a Form G can be found at the Commission website: http://www.cpuc.ca.gov/General.aspx?id=2878.

For trail work at the South Land Park Drive, Sutterville Road (CPUC# 093-3.50, DOT#914552R) and Interstate 5 (CPUC# 093-3.09-B, DOT# 914551J) railroad crossings, the City must file a Commission General Order (GO) 88-B request with RCEB. The GO 88-B approval process includes an on-site diagnostic meeting with RCEB and California State Railroad Museum (CSRM) staff. Please be advised that RCEB staff will not support a pedestrian/bicycle pathway of any type within the confines of the existing CSRM rail bridge that crosses over Interstate 5.

Working with Commission staff and CSRM early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

Thank you for your consideration of these comments. If you have any questions, please contact me at (916) 928-2515 or email at atm@cpuc.ca.gov.

Sincerely, Ľ a

David Stewart Utilities Engineer Safety and Enforcement Division Rail Crossings and Engineering Branch 180 Promenade Circle, Suite 115 Sacramento, CA 95834-2939



Honoring the past. Inspiring the future.

COMMUNITY DEVELOPMENT DEPARTMENT

JUL 6 2018

RECEIVED

Via E-Mail (tbuford@cityofsacramento.org) and Hand Delivery

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

Re: Del Rio Trial EIR: Appropriate Scope of Analysis

Dear Mr. Buford:

Please accept these comments in response to the Notice of Preparation of an Environmental Impact Report for the Del Rio Trail Project (K15165100), June 8, 2018. We provide these comments on behalf of the California State Railroad Museum Foundation (the "Foundation") as to the appropriate scope of analysis for the EIR.

THE COMMENTER'S INTEREST

The California State Railroad Museum Foundation (CSRMF) is an official cooperating association with California State Parks and a 501(c)(3) organization. CSRMF provides funding for ongoing support of numerous programs at the California State Railroad Museum in Old Sacramento, Railtown 1897 State Historic Park in Jamestown, and the future Railroad Technology Museum.

With almost 12,000 members, the Foundation's mission is to generate revenue and awareness on behalf of its destinations, while supporting the preservation, interpretation and promotion of our railroad heritage. As your project team knows from meetings with us on December 8, 2017, and April 4, 2018, the Foundation strives to protect the heritage of the Sacramento Southern Railroad, also known as the Walnut Grove Branch Line. Indeed, in our December meeting with the project team, a Dokken Engineering representative acknowledged that the Foundation is among the "stewards of the resource," referring to the Walnut Grove Branch Line and its status as a historical resource under state and federal law.

The Del Rio Trail will utilize Sacramento Southern's right-of-way. As the project team has conceded, and as ample documentation proves, a bike trail and preservation of the rails are not contradictory. However, the Foundation's goal is not just preservation of the rails, but to prevent the city from altering the rails in ways that would preclude all future use of any kind or nature.

We fear that the city is allowing the South Land Park Neighborhood Association to hijack the trail-planning process. The president of that association has admitted its plan to eliminate the possibility that the rails could be utilized in the future.

111 I Street Sacramento, CA 95814-2265 www.csrmf.org

July 9, 2018

That result would benefit a handful of residents who bought homes with full knowledge that their homes abutted the Del Rio corridor, even though other association members and numerous city residents have voiced support for retention of the rails. We do not believe an effort to prevent potential future use is a proper purpose under the California Environmental Quality Act or the National Environmental Policy Act.

Keeping a historical building but gutting it and boarding it up is not historical preservation. To fully honor the history of the Sacramento Southern, the city must preserve the rails as a viable route that could support future use. We fear that, once lost, the rails will never return no matter how badly our community may need them and no matter how they might support our economy or the environment. However, please do not lose sight of the fact that the Foundation also wholeheartedly supports the Del Rio Trail for making the most beneficial use of the right-of-way. We resent that SLPNA promotes the false argument that the community faces a choice between rails and a trail. They are both compatible.

CONSIDER A NO-WALKING-TRAIL ALTERNATIVE

As the project team has conceded, preservation of the rails does not conflict with a bike trail. In fact, the 1994 EIR for Regional Transit's consideration of a transit route along the Del Rio corridor acknowledged that the right-of-way would accommodate both a light-rail train and parallel excursion train tracks. Therefore, any argument that the Del Rio corridor could not accommodate both a bike trail and rails defies common sense and the evidence.

The project team has also conceded that the walking trail will not be compliant with requirements of the Americans with Disabilities Act, so the city will be unable to prohibit walkers from using the bike trail. That concession creates a dilemma for the city. The state's Highway Design Manual and the California Vehicle Code require walkers to use a walking trail when one is provided, but the city will be unable to do so. (See Cal. Hwy. Design Manual, 1003.1(2) (Nov. 20, 2017) ("The CVC requires a pedestrian to use a pedestrian facility when adjacent to a bike path."); Cal. Veh. Code § 21966.)

The walking trail is also a costly redundancy. The project team plans to construct a bike trail with the usual two-foot shoulders of decomposed granite to accommodate walkers and runners—an obvious necessity if the city cannot prohibit walkers from using the bike trail. Thus, the walking trail adds to costs of the trail project and could delay its completion if the city must phase the construction as funding becomes available. Even if the city could obtain full funding from the Sacramento Area Council of Governments to complete the dual-trail project, the funding award would divert some measure of funds from other projects that are far more worthy than a superfluous and unnecessary walking trail.

The project team claims a need for the walking trail because of complaints about walker-bicyclist conflicts. However, we believe the city has yet to consider an ordinance—like a county ordinance that governs the American River Bike Trail—requiring runners and walkers to use the shoulders on the left side of the trail and imposing a speed limit on bicyclists. The lack of an ordinance means that the city makes no real efforts, such as signage, to reduce potential conflicts among users. At a minimum, the city should test alternatives such as regulation before spending funds on a walking trail that is unlikely to address the concerns raised by the project team.

The last version of plans presented to us by the project team show that only the walking trail impinges on the historical rails. Given the questionable benefits of the walking trail, the city's plans would be less objectionable and more cost effective by opting for a single bike trail without a separate walking trail. The result would be a plan that requires far less alteration of the historical resource. Therefore, we ask that the EIR fully address the no-walking-trail alternative.

CONSIDER ABANDONMENT OF THE DEL RIO ROAD CROSSING

According to the project team, as reflected in maps and explained in our April 4 meeting, the city proposes to remove 169 feet of rails at the Del Rio Road crossing and to remove the former levee at this location to bring both sides of the crossing to grade level. To accomplish its goal of preserving more than 98% of the rails, the project team proposes to move the rails to a section where rails were removed and not replaced during a sewer pipe installation some years ago. The purported purpose of the rail removal and alteration is to make the Del Rio Road crossing safer. However, the city can accomplish even more without undue hardship by simply abandoning the Del Rio Road crossing of the rails. Better alternatives for north-south vehicle passage exist on South Land Park Drive and Freeport Boulevard. The current and proposed Del Rio Road intersection funnels vehicles onto neighborhood streets that do not seem to be intended as thoroughfares. The alternative routes are obviously intended as thoroughfares.

The abandonment of the Del Rio Road crossing creates an addition benefit for the Del Rio Trail: elimination of a road crossing. The result will be a safer trail for all users, and a more cost-efficient trail plan. Therefore, we ask that the EIR fully address the prospect of abandoning the Del Rio Road crossing of the rails.

THE CITY SHOULD CONSIDER ALL RELEVANT DOCUMENTS

Thanks to the efforts of members and supporters, the Foundation has gathered a number of documents that are relevant to the city's current plan and the feasibility of future rail uses. We believe the project team must incorporate these documents into its consideration of impacts and alternatives:

- 1. Agreement, State of California and Southern Pacific Transportation Company for the replacement of the "Land Park Underpass," April 18, 1972
- 2. Feasibility Study, "Steam Train to Sacramento," January 1980
- 3. "Regional Transit Issue Paper" and attachments, March 3, 1988
- 4. "Draft Environmental Impact Report for the Extension of the Steam Excursion Train[,] Old Sacramento to Hood," June 1989
- 5. "National Register of Historic Places[;] Significance Evaluation of Walnut Grove Branch Line Railroad, Sacramento, California," April 30, 1991
- 6. "Final Environmental Impact Report[;] Extension of the Steam Excursion Train, Walnut Grove Branch Line," September 1991
- "Walnut Grove Branch Railroad[;] National Register Nomination[;] Sacramento County, California," August 19, 1992
- 8. "Alternatives Analysis[;] Draft Environmental Impact Statement[;] Draft Environmental Impact Report," Sacramento Regional Transit, rec'd September 23, 1994
- 9. Letter, W. Gray, California State Railroad Museum, to P. Robinson, Sacramento Regional Transit District, February 28, 1996
- 10. "Historic American Engineering Record No. CA-357," January 2007
- 11. Letter, P. Robins, Sacramento Regional Transit District, to S. Hill, State of California Department of Recreation, October 12, 2001
- 12. E-mail String, R. Baxter, B Sinclair, D. Wrightsman re "R Street Bridge/Land Park Bridge Agreements," April 17, 2008 to October 7, 2008
- 13. " 'Land Park Bridge and 'R' Street Bridge Easement Exchange and 'Operation and Maintenance Agreement," June 23, 2008
- 14. "Old Sacramento State Historic Park[;] General Plan Final Environmental Impact Report," December 2013
- 15. "Old Sacramento State Historic Park[;] General Plan Mitigation Monitoring and Reporting Plan," December 2013
- 16. "Old Sacramento State Historic Park[;] General Plan Final Environmental Impact Report," June 2014
- 17. "City of Sacramento's application for the Sacramento Area Council of Government's (SACOG's) 2015 Regional Bicycle & Pedestrian Funding Program and the Regional Active Transportation Program for the Del Rio Trail," May 28, 2015
- 18. Transmittal Letter re above, J. Way, City of Sacramento, to L. Symons, V. Cacciatore, SACOG, June 19, 2015
- 19. Letter, C. Marcell to F. Harris, City of Sacramento, June 17, 2016
- 20. Letter, J. Gothan, City of Sacramento, to C. Marcell, March 8, 2017
- 21. "California State Railroad Museum'[;] Strategic Plan 2017-2022," approved June 13, 2017
- 22. Letter, C. Marcell to J. Gothan, January 19, 2018

- 23. "2290-Overall Exhibit" (map of planned Del Rio walking and biking trails), presented at meeting with C. Marcell and J. Houpt, April 4, 2018
- 24. Letter, C. Marcell to J. Gothan, May 9, 2018
- 25. Draft Letter, C. Butcher, Thomas Law Group, to J. Matsui-Drury and C. Anderson, undated

If you lack any of the documents listed above, we will be happy to forward copies.

* * * *

By this letter, we ask that you keep the Foundation informed at all stages of development in the process of drafting the Del Rio Trail EIR. We have concerns that the city is not keeping the Foundation informed even as it keeps other stakeholders in the loop. We trust you will correct this inequity as the city proceeds in its planning of the Del Rio Trail.

As we have explained repeatedly, the Foundation's effort to preserve the rails is not a referendum on an excursion train or any other potential use for the rails. The South Land Park Neighborhood Association has vilified the Foundation for seeking rail preservation and has repeatedly misrepresented our position. We hope the city will educate the public and inform its constituents that the future use of the rails will require new or amended general plans or specific plans, and an environmental review, all requiring public notice and hearings. Preservation of the rails is not "the camel's nose under the tent," as SLPNA is promoting.

We trust that the project team and the city council understand the need to protect our heritage as a farm-to-fork city. The Sacramento Southern Railroad was the highly successful rail-based effort to bring Delta crops to the country. The loss of this heritage in any respect will be a blow to historic preservation.

Sincerely,

Cherf Marcell

Cheryl Marcell President and CEO

cc: Jesse Gothan, City of Sacramento Sacramento City Councilmembers Old Sacramento Committee, CSRMF





Central Valley Regional Water Quality Control Board

COMMUNITY DEVELOPMENT DEPARTMENT

2 July 2018

JUL 6 2018

Tom Buford City of Sacramento 300 Richards Boulevard, 3rd Floor Sacramento, CA 95811 CERTIFIED MATCEIVED 91 7199 9991 7039 6992 5659

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, DEL RIO TRAIL PROJECT, SCH# 2018062009, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 8 June 2018 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environment Impact Report* for the Del Rio Trail Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases,

KARL E. LONGLEY SCD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER



the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website: http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at: http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.sht ml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_ permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit - Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements – Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver)

R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/w qo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

- 1. Obtain Coverage Under a Coalition Group. Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/for_growe rs/apply_coalition_group/index.shtml or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
- 2. Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100. Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits. For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_ord ers/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_ord ers/r5-2013-0073.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.

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Stephanie Tadlock Environmental Scientist

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



June 18, 2018

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

The South Land Park Neighborhood Association (SLPNA) submits this letter in response to the City's NOP for the Del Rio Trail Project (Project). We are a volunteer-run, nonprofit neighborhood association representing an area of approximately 14,000 residents. SLPNA has been involved in the City's community outreach and discussions of the Project to-date. The City has been listening to the ideas and concerns of all involved in the outreach, and has done a redesign of the conceptual plan for the purpose of historical preservation of the abandoned rails. SLPNA strongly supports the design and construction of a bicycle and pedestrian trail that becomes an asset for both the local neighborhood and the City of Sacramento at large.

Project Context in the Regional Trail Network

SLPNA believes the EIR should put the Project in context of its importance at the local, City, and regional levels. The Del Rio Trail will not be an isolated trail used only by the local neighborhood. The Project is an important connector south of the downtown core in both the City's Bicycle Master Plan (2016), and Sacramento County's Bikeway Master Plan (2011). The Project is listed as a priority for near-term implementation in the City's Draft Bicycle Master Plan (2018).

The American River Parkway is the "backbone" of our region's Class 1 multi-use trail network (about 29 miles from Old Sacramento to Folsom). Two other existing Class 1 trails serve north Sacramento and Rio Linda (Sacramento Northern and Walter Ueda, together about 12 miles).

From downtown, the Sacramento River Parkway trail extends about 3.5 miles south. The Del Rio Trail would extend the network another 4.5 miles south, and connect to an existing 2.5 mile trail on the River serving the Pocket neighborhood, and the new Delta Shores Project trail network that is already approved. From Day 1, the Del Rio Trail will be part of a 50+ mile Class 1 trail system connecting much of the region.

New trails planned in Delta Shores and Pocket/Greenhaven will directly complement the Project and further expand the network to serve more residents and neighborhoods. The network will extend from Folsom to Freeport, with only a few short breaks in the Class 1 off-street trail. With the Del Rio Trail connecting large areas in the south of the City, the regional trail system will gain a size and connectivity that makes it one of our premier assets and attractions.

Regional Attitudes about Civic Amenities

Last year Valley Vision produced a report entitled "Regional Attitudes about Civic Amenities" (2017). The report conducted a poll throughout the region, and attention was given to non-English speakers, gender, race/ethnicity, and age in order to adequately represent the population. When asked to rank the single most important civic amenity to their quality of life, 54% of respondents ranked parks and trails as #1. A distant second was science and history museums at 9%. Urban parks and greenbelts were the single most frequently used amenity by the respondents. Parks and trails are relatively inexpensive compared to other amenities. The City, and the region, gets its biggest "bang for the buck" with projects like the Del Rio Trail.

Expected Use and Separated Pedestrian/Bicycle Paths

SLPNA expects, and is excited, that the Del Rio Trail will be well-used. We expect several general classes of users, and encourage the City to consider how all of their needs are addressed by the Project design and the alternatives. The Project, in combination with the existing Sacramento River Trail, will create a direct Class 1 trail into downtown for bicycle commuters. The Project, embedded in residential neighborhoods, will also be a recreational amenity for adults and children (both on foot and bike), dog-walkers, and runners. More advanced cyclists will use it on long-distance rides, and to reach rural Delta roads via the Freeport Bridge. Due to the access that the Del Rio Trail will provide to multiple grocery-anchored shopping centers, we also expect more use by local "errand-runners" than exists on some other trails.

We have heard from City transportation specialists and parks staff that the single most common complaint the City gets on combined bicycle/pedestrian paths has to do with conflicts between bicycles and pedestrians. In order to improve this situation in the future, it is the City's intent to separate these uses onto separate trails wherever possible, including on the Del Rio Trail. SLPNA has heard a similar story from our membership, where the separated trail design is very popular. The City's reasons for including separated paths wherever possible should be explained in the EIR, and an alternative should be included that maximizes separated paths.

A Note About Homelessness

Homelessness is a complex issue that affects the entire City. Homeless people sometimes camp in various locations along the Project corridor in somewhat hidden locations. That is the Project baseline condition for the EIR.

SLPNA does not believe the Project will attract more homeless people. Claims have been made that the Project will turn into a homeless camp comparable to the lower American River Parkway, simply because there is a bike path there. Many other City bike paths and greenbelts, including the upper American River Parkway, have relatively few or no homeless camps. The reason is that bike paths do not attract the homeless, secluded camping sites do. The homeless are attracted to camping on the lower American River Parkway because there is a dense forest for camping out-of-sight, and the proximity to homeless services nearby. We believe the Del Rio Trail, by "opening up" the abandoned rail corridor, and making it far more usable by neighborhood residents, will discourage homeless camps.

Conceptual Designs to-Date, and the Issue of Trains

In December 2017, the City held a meeting with the California State Railroad Museum Foundation (CSRMF). CSRMF is a non-profit organization affiliated with the California Department of State Parks (State Parks). At the time, the City's conceptual design for the Project would have retained about 50% of the old railroad (RR) tracks. CSRMF expressed their desire for greater preservation of the railroad tracks in a January 2018 letter to the City. In response to CSRMF, the City produced a second conceptual design that retained about 98% of the RR tracks and had another meeting with CSRMF in April 2018. In response, CSRMF wrote a letter to the City in May 2018 that requested 100% RR track retention, and asked the City to "show that the rail line could potentially be viable again under the right circumstances" as part of the Del Rio Trail Project. In addition to 100% RR track retention, CSRMF's May 2018 letter requested that:

- 1) Flangeways be installed on all street and trail crossings of the RR tracks "to signify potential future use of the track",
- 2) Necessary trail crossings of the RR tracks be realigned perpendicularly,
- 3) The RR tracks not be used for a walking path,
- 4) No landscaping or wildflower seeding occur in the RR tracks,
- 5) The City allow the RR Tracks to be maintained and repaired,
- 6) The City grant right-of-way for "future use and reconstruction of the tracks."

The Project purpose and need clearly identify that the Project is a pedestrian and bicycle project. None of these items address the Project purpose and need, and the implementation of some would hinder design of the Project. These items address a separate venture that CSRMF envisions that would allow train traffic in some distant future. In 2014 California State Parks adopted a 20-year General Plan and EIR for the Old Sacramento State Historic Park (SCH #201009206). The Draft EIR for that project considered returning limited train traffic to the abandoned RR tracks south of Sutterville Road and north of the town of Freeport in order to provide support services for a proposed tourist excursion train from Meadowview Road to the town of Hood. After significant neighborhood opposition to that component of the Plan, and a finding that noise impacts in the South Land Park area would be "significant and unavoidable" with "no feasible mitigation" State Parks removed the proposal for return of train traffic within the Project limits from the Final Plan and EIR (*ibid.*)

The City should not design the Del Rio Trail around a proposed train project that was rejected by the very State agency that operates the Old Sacramento excursion train. The City should design the Del Rio Trail to best serve the Project purpose and the needs of pedestrians and bicyclists. We are aware the abandoned RR tracks are considered a historical resource. SLPNA supports the incorporation of the RR tracks, and the development of a RR theme, into the Project to the extent this can be accomplished without jeopardizing public safety or sacrificing overall trail design.

Recommended Alternatives

The City has already developed two conceptual designs of the Project. It is appropriate for the City to consider both of these conceptual designs as Project Alternatives. In general, the two design alternatives are:

- 1. The first conceptual design developed by the City that maximized the Project's service to pedestrians and bicycles and most directly addressed the stated purpose and need. This design retained about 50% of the RR tracks.
- 2. The second conceptual design developed by the City. This design made sacrifices in the trail's service for pedestrians and bicycles, but retained about 98% of the RR tracks.

SLPNA encourages the City to include both of these alternatives in the EIR.

Potential Mitigation

The primary concerns the local neighborhood has with the Project are issues of privacy and security. These are already baseline issues with the Project corridor. However, Project design should not worsen the existing conditions, and may be able to improve them. SLPNA is appreciative that the City design team has been consulting with the Police Department and City Parks Rangers on this issue. The following ideas could be incorporated into the Project design, or used as mitigation measures, under any alternative:

1. In general, trees and shrubs should be retained. We recognize some vegetation removal is necessary for the Project. The vegetation provides a privacy screen along many of the adjacent backyards. Pruning of lower tree canopies up to a height (about 5–6 feet) just below that of backyard fences would give the Trail a clean, well-kept look while still retaining privacy.

- 2. Multiple residents have expressed a desire to showcase the natural vegetation of the area, especially valley oaks. The Sacramento Tree Foundation expects to plant some native valley oaks and black walnuts in the corridor in Autumn 2018. SLPNA intends to coordinate volunteers for the effort. The Project design could identify future locations for native tree and shrub planting specifically for enhanced privacy, even if the Project did not plant the vegetation directly. The Sacramento Tree Foundation has told us they are always short of planting locations, and the Del Rio Trail could be "planted out" with trees over the course of years.
- 3. In several locations the existing grade in the Project corridor is higher than the adjacent backyards. Where feasible, the grade should be lowered so that Trail users would not be able to see into backyards and windows.
- 4. Placing the pedestrian path in the RR tracks is a way to maximize track preservation, but it also creates privacy issues, as in many places the tracks are at the highest point in the corridor. At such locations, the Project should consider removing the RR tracks, lowering the grade, and then re-installing the tracks and constructing the pedestrian path. In some locations along the corridor, this could allow for 1) track preservation, 2) a separated trail, and 3) privacy to all be achieved.
- 5. Different designs and materials should be considered for incorporating the existing RR tracks into a pedestrian path. The utility and safety of the design should be paramount. Aesthetics is also a consideration.

Cordially,

BRIAN EBBERT President South Land Park Neighborhood Association

 cc: Darrell Steinberg, Mayor Jay Schenirer, Council District 5 Steve Hansen, Council District 4 Rick Jennings, Council District 7 Larry Carr, Council District 8 Assembly Member Jim Cooper Senator Richard Pan Secretary John Laird, Natural Resources Secretary Lisa Mangat, State Parks Director Julianne Polanco, State Historic Preservation Officer

July 3, 2018

Dear Mr. Buford,

My name is Dr. H. Wesley Yee and a 64 year resident of Sacramento. I also serve on the board of the California State Railroad Museum Foundation. I'm also President of the Land Park Center LLC, which has Sprouts Market and La Bou as its tenants. So we are deeply invested in the South Land Park neighborhood and Sacramento. I grew up on Normandy Lane and Crestwood Way. My father, Dr. Herbert Yee, still lives there. This was a block away from the SSRR/WGBL and watched many of trains roll by. As a youngster I road my bike next to the train tracks to play Pacific Little League games and traveled across the tracks to attend Sutterville Elementary School. I was taught to have a healthy respect for trains and to be extra careful whenever I played around the tracks.

I'm all for adding a bike/pedestrian trail and preserving the rails. There are many examples of rails and trails coexisting even in California. Sonoma County, the Napa Wine Train, and even the tracks north of Miller Park work extremely well with bikes and trains. The rails can be protected and should not be removed. This vital infrastructure of rail could come in handy in the future. So why destroy this costly infrastructure? Only a small group of well connected, highly vocal, and influential individuals are pursuing this agenda. I am old enough to remember the fight to save the Alhambra Theatre and how sad to see it be demolished. Fortunately we saved the Crest and Esquire theatres. The Yee Family has been in this great state since 1851 and currently helping replace a roof on our ancestral herbal store in Fiddletown California. By preserving these rare pieces of history, we are teaching our future generations about our industrial and agricultural roots.

Our Yee family continues to serve our city as board members of Sutter Hospital, Pioneer Association, Sacramento Zoo, Fairytale Town, Rotary Club of Sacramento, Chinese American Council, US China Railroad Friendship Association, Sacramento District Dental Society, and Merchants National Bank. So yes we are invested in Sacramento, make Sacramento our home. and want to do what's right for our community and public. We will all be better off now and in the future if we make this a rail and trails path.

Respectfully Yours

bly yappe

H. Wesley Yee DDS

GREGG LUKENBILL

July 9, 2018

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

Re: Del Rio Trial EIR: 1) Defective Notice of Preparation; 2) Inadequately Defined EIR Scope; 3) Erroneous Project Description; 4) Inadequate, Negligent, or City Directed Staff & Consultant Preparation intentionally omitting decades of State and Federal Environmental Documents from the City Planning Process required by CEQA and NEPA

Dear Mr. Buford:

Let me begin by saying that I am writing this letter as an individual, and NOT as a Board Member of the Sacramento Historical Society or the California State Railroad Museum Foundation, both on which I serve.

I am providing herewith my comments, as well as providing historic related, site specific government documents of Regional Transit, the Sacramento Area Council of Governments (SACOG), and California state and federal environmental related documents omitted by the State and City of Sacramento from the last 4 years of government meetings, in numerous public hearings leading up this Notice of Preparation of a California Environmental Impact Report. The sustained actions of the City of Sacramento omission of thousands of pages of the public record, particularly 3 national Army Corps of Engineers federal studies clearly demonstrates the incompetence, negligence, or the far more likely prejudged, City of Sacramento process omitting these documents, and renaming the longstanding right of way of the 112 year old, globally unique, nationally registered Walnut Grove Branch Line thoroughfare the Del Rio Trail.

As a native who remembers our agricultural renown, I can personally attest to the fact that this Delta to Farm to Fork Train thoroughfare provided the core job employment of thousands of grandparents of current residents of our Sacramento region.

This City Project Description itself is intentionally deceptive and defective due to an inadequate prior public process and description for the last 3 years, emanating and inclusive of the prior, legally defective, 2014 Old Sacramento General Plan EIR. The City of Sacramento is fully aware the "abandoned railway corridor' as specifically cited and physically described, is not abandoned, but in fact is "active". It is false to label it abandoned, unless you are referencing the same 112 year old rail line right of way whose very existence was omitted in the public record from 2012 to the present time by the state, City, RT, and SACOG.

Attached on a flash drive, as items 2 & 3 are two respective videos of the California State Railroad Museum, and the docents of the California State Parks Sacramento Southern Railway that demonstrate the personal volunteer passion that has sustained these train operations for nearly 40 years, thereby actually inspiring the 1989 Parks application of extending the existing State approved operation of the Sacramento Southern Railway from Old Sacramento to Hood. That 1991 approved EIR is still valid, and actually recently built the train from Old Sacramento to Sutterville Road by many of the same docents referenced above.

The operating Sacramento Southern Railway, and the 400+ volunteer of California State Parks docents, many of whom have lived their lives loving and giving their time to Sacramento for more than 35 years, are included on the flash drive videos. These Sacramentan's donate tens of thousands of hours annually presenting Sacramento's globally unique, Sacramento transcontinental railroad role, in the Museum, (our second largest tourist attraction in annual Sacramento visitors), and operating the Sacramento Southern Railway southbound. Moreover, in a

longstanding public/partnership the California State Railroad Museum Foundation has spent more than a million dollars a year extending, maintaining and operating this historic route at no cost to the taxpayers in support of the docents.

Much like the loss of Edmonds Field, the Alhambra Theater, the 1982 Council vote chasing Intel from this city, and stopping the Kings from being moved to Sacramento onto the very same private property in the City, this City is now poised to rise up once again to create nothing out of a historic moment, by killing the train, destroying city jobs, and global Sacramento historic tourism for our future generations.

I would appreciate it if you would include the attached documents for the public record and review in this process.

The following related documents are hereby enclosed on a flash drive in reference the foregoing, to be included in the public record.

- 1) 1980 Jerry Brown Steam Train To Sacramento (paper also)
- 2) Sacramento Southern Aerial Video (flash drive only)
- 3) Sacramento Southern video of the docent volunteer construction of the route (flash drive only)
- 4) 1989 Walnut Grove Branch Line EIR HISTORIC ROUTE (paper also)
- 5) 1991 9-26 Final Specific Excursion Train EIR Approval PDF (paper also)
- 6) 1989 Draft EIR for Steam Train Extension to Hood Merged & compressed (paper also)
- 7) RT-CA Agreement 4-11-88 for ROW Sac Southern (paper also)
- 8) 1991-4-30 Army Corps National Historic Resource Determination
- 9) 1991-11-25 Regional Transit Survey of 4.5 Mile 11-25 Excursion Train Shared Use Right of Way
- 10) 1992-8-19 Army Corps Walnut Grove Railroad National Register Nomination
- 11) 1994 Sac RT South Sacramento Corridor Transit Improv EIR (includes excursion train) (flash drive only)
- 12) 1996-2-28 CSRM to Reg Transit Proposed lease of South Sac ROW
- 13) 2007 National Historic American Engineering Record Registration
- 14) 2014 June Final Old Sacramento EIR (flash drive only)
- 15) SACOG 5-28 2015 Original Application del_rio_trail_application (flash drive only)
- 16) CA PARKS-CSRM-FOUNDATION JOINT MASTER PLAN Document as Approved June 13 2017 (flash drive only)

Cordially, regg Likenley

Gregg Lukenbil

Note from the City of Sacramento:

The supporting documents provided by Mr. Lukenbill were not attached to this Draft EIR due to file size; however, they are available for public review. Please contact Mr. Tom Buford, Manager of Environmental Planning Services at (916) 808-7931 or tbuford@cityofsacramento.org if you wish to obtain copies of these documents.

Arthur E. Bauer



COMMUNITY DEVELOPMENT DEPARTMENT

JUL 6 2018

RECEIVED

July 9, 2018

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

Dear Mr. Bulford:

This letter is in response to the recent Notice of Preparation issued by the City of Sacramento regarding the preparation of an Environmental Impact Report for the proposed 4.5 mile Del Rio bicycle and pedestrian path project. The proposed path extends from south of the Pocket Road/Meadowview Road intersection to the vicinity of Sutterville Road and the railroad bridge crossing Interstate 5. This alignment is located in the former right-of-way of the historic Sacramento Southern Railroad (also known as the Walnut Grove Branch Line).

I believe the proposed EIR should incorporate an analysis of the historic, economic, and cultural significance of the Sacramento Southern Railroad, including the segment proposed for a bicycle and pedestrian path. Moreover, safety issues at the intersection of the proposed path and Sutterville Road should be evaluated. Lastly, impacts to the micro-climate resulting from removal of the trees and vegetation growing on the west side of the railroad embankment between Sutterville Road and the railroad bridge over I-5 be should be analyzed.

Before considering each issue described above, I would like to provide an overview of Sacramento's relationship to its railroad heritage, and its current citywide rail system and industry.

1. Context—Sacramento and Its Railroads

Proponents of the bicycle and pedestrian path oppose allowing the state Department of Parks to use the existing tracks in the Del Rio right-of-way to move equipment intermittently to the excursion train depot at the Pocket/Meadowview Road intersection. They claim this would be injurious to their community. That position cannot be supported given the successful intertwining of active freight railroad corridors that occurs daily throughout the City of Sacramento.

Historically, the railroad industry is one of three pillars supporting the development of Sacramento (the other two being the Gold Rush and state government). Sacramento's historic and contemporary relationship with railroads suggest that they are not a blight on the community. For example, the high

Mr. Tom Buford, Manager Environmental Planning Services Page 2

railroad levees that define the boundaries of the East Sacramento and Riverpark neighborhoods have never caused any degradation of these very desirable communities. Even though freight trains and Amtrak operate daily on the levees above these two neighborhoods' expensive private residences and commercial properties, no significant impacts are experienced.

Even today expensive homes are being constructed adjacent to an operating interstate railroad right-ofway. An example of this is McKinley Villages, a 300-home residential development in a fifty- acre bowl created by the Business 80 highway and a railroad levee that is in daily use. Depending on the state of the economy, over 40 trains per day traverse the railroad intersection above and adjacent to the Village. Indeed, this intersection is among the busiest in the Western United States. Similarly, Crocker Village, a residential development located in the former Western Pacific equipment maintenance yards, tucked in between Curtis Park and Sacramento City College, has active mainline railroad tracks and storage tracks on its western perimeter.

Before McKinley Villages and Crocker Village were built, and despite that they bordered an active mainline railroad tracks, the Sacramento city council determined that no harm would be visited upon the residents of either project, when it granted entitlements to the developers.

Railroad tracks are ubiquitous in Sacramento, indeed a normal part of the cultural and physical environment. Mainline tracks are found adjacent to residential communities in most districts of the city, including Del Paso Heights, North Sacramento, Midtown, and South Sacramento. For 150 years, Sacramento and the railroad industry have been living together in a harmonious and mutually beneficial relationship. To argue, as the proponents of the bicycle/pedestrian trail do, that the periodic movement of railroad equipment in the Del Rio Corridor, consistent with the State Parks plan for an excursion train, will degrade the community is disingenuous. Moreover, it is inconsistent with the daily experience of thousands of Sacramentans. Sacramento neighborhoods have not been degraded by railroad trains.

It should be emphasized that many of the homes along the Del Rio corridor were constructed and purchased by willing buyers well before Sacramento Southern service was terminated in 1978. Plainly, railroads have been well integrated into Sacramento's neighborhoods for over a hundred years without deleterious consequences.

2. Basis for Analyzing the Historical and Cultural Significance of the Sacramento Southern Railroad Right-of-Way

In 1991, the California State Historic Preservation Office (SHPO) determined that the Sacramento Southern Railroad right-of-way, operating over what is called the Walnut Grove Branch Line, was eligible for listing in the National Register of Historic Places. The Army Corps of Engineers' report entitled <u>National Register of Historic Places Significance Evaluation of the Walnut Grove Branch Line Railroad</u> also concluded in 1991 that historic status should be given to the rail line. In January 2017, the Historic American Engineering Record agreed with these earlier reports concerning the historic significance of

Mr. Tom Buford, Manager Environmental Planning Services Page 3

the right-of-way¹. A copy of this report and the Army Corps of Engineers report are included for your review. The three professional documents cited above, all ratify the historical quality and significance of the railroad right-of-way now being proposed to be decommissioned.

A Note on Historical Analysis

To enjoy the confidence of the public, the city should establish a process that ensures the historical analysis of the rail right-of-way will be professionally sound. Based on conversations with individuals elsewhere in the state, I know there is a high level of concern among those interested in historic railroads, about the disposition of the Sacramento Southern right-of-way and the fate of the excursion train.

I would recommend that the city form an advisory group including representatives of the Sacramento Historical Society, the California State Railroad Museum, the California State Railroad Museum Foundation, the South Land Park Neighborhood Association, the Sacramento River Delta Historical Society, and others to participate in the selection of the historian. It should be noted that the California Office of Historical Preservation, following criteria of the U.S. Secretary of Interior, suggests that any historian retained for an EIR be associated with an academic institution. This professional should also have made a "[s]ubstanial contribution through research and publication to the body of scholarly knowledge in the field of history."² Involvement of an individual of this caliber would assuage public concern over the integrity of the EIR's historical analysis.

3. Conformance with Old Sacramento State Historic Park General Plan

In addition to confirming the undisputed historical significance of the Sacramento Southern right-ofway, the general plan for the Old Sacramento State Historic Park, commissioned by the California Department of Parks and Recreation, states that "[an] excursion train line within State Park-owned right-of-way from the Pocket-Meadowview area to Hood, on the historic Walnut Grove branch line"³

¹ "The Historic American Engineering Record (HAER) was established in 1969 by the National Park Service, the American Society of Civil Engineers, and the Library of Congress to document historic sites and structures related to engineering and industry. This program was later ratified by four other engineering societies: the American Society of Mechanical Engineers, the Institute of Electrical and Electronic Engineers, the American Institute of Chemical Engineers, and the American Institute of Mining, Metallurgical and Petroleum Engineers. <u>Appropriate subjects for documentation are individual</u> <u>sites or objects, such as a bridge, ship, or steel works; or larger systems, like railroads, canals, electronic</u> <u>generation and transmission networks, parkways and roads</u>." Underscoring added. See <u>https://www.nps.gov/hdp/haer/index.htm</u>

² See <u>California Office of Historic Preservation Technical Series #1, California Environmental Quality Act and</u> <u>Historical Preservation</u>, page 30, May 23, 2001.

³³ Old Sacramento State Historic Park General Plan and Environmental Report, State Department of Parks and <u>Recreation</u>, June 2014, page ES 2.

Mr. Tom Buford, Manager Environmental Planning Services Page 4

would expand the visitor experience. A train ride on an authentic vehicle provides a rare interpretive opportunity to understand the relationship of railroads with the development of the California's agricultural economy, especially the unique economy of the Delta. This opportunity is unavailable at any other California state park.

The proposed excursion service over railroad right-of-way owned by the Department of Parks is only feasible if railroad equipment stored and maintained in Old Sacramento can traverse the 4.5 mile Del Rio corridor. Any other alternative would not be cost-effective. As pointed out in the General Plan, a locomotive drawing passenger cars for the excursion service will only be used to position equipment at the station and to move equipment to Old Sacramento for maintenance. Passengers will not be moved over that segment of the right-of-way and the equipment will be stored at the excursion station.

Because there is adequate room for both the existing tracks and a bicycle/pedestrian path in the rightof-way, it is not necessary to remove the tracks from the right-of-way and the streets which cross the tracks or prohibiting the Sacramento Southern trains from operating on the existing tracks. Therefore, it is completely misguided for the bicycle/pedestrian proponents to deny Californians to opportunity to enjoy a unique statewide asset as envisioned in the General Plan and thereby thwart the department of Parks and Recreation from meeting its obligation to serve all the people of California.

The EIR would be inadequate if the historic and cultural significance of the Sacramento Southern/Walnut Grove Branch Line was not thoroughly analyzed and appreciated. Indeed, the EIR would be deficient if the statewide significance of the line was not included in the analysis, as the Delta environment has both historic and contemporary significance.

4. Safety Concerns at Sutterville Road/Railroad Right-of-Way Intersection

Sutterville Road is a major thoroughfare providing access to and egress from 1-5. It is heavily used during the morning commute by people accessing the freeway to travel to work and exiting the freeway to attend Sacramento City College. This travel pattern is reversed in the afternoon. Moreover, from the I-5 ramps to Freeport Boulevard, Sutterville Road is heavily congested on the weekends, except for the winter, by people driving to visit the Sacramento Zoo and Fairytale Town in William Land Park. Because of the short distance between the I-5 ramps and the stop lights at the unconventional intersection of Sutterville Road, Land Park Drive, South Land Park Drive, and Del Rio Road, a careful analysis must be made of how bicyclists and pedestrians will safely cross Sutterville Road. It is recommended that the EIR include a bicycle/pedestrian bridge as one alternative for crossing the busy thoroughfare.

5. Necessary to Analyze the Potential Impact of Removing A Canopy of Trees

Because of the potential impact of climate change on the environment, the EIR is required to analyze if there are any areas along the Del Rio corridor where such as impact may occur. I would suggest the dense growth of trees and vegetation along the railroad levee between Sutterville Road and the I-5 railroad bridge requires such an analysis. If that growth must be removed to accommodate the

Mr. Tom Buford, Manager Environmental Planning Services Page 5

bicycle/pedestrian path, the residences located below the levee will no longer have the benefit of the shade created by the canopy of trees. The EIR must thoroughly analyze the environmental consequences upon the local micro-climate by removing the canopy and identify the appropriate mitigation measures.

6. Conclusions

The purpose of an EIR is to inform the public of the impact of a project on the community and to enhance the knowledge of public officials when making decisions regarding a project. An EIR may not be used to promote, endorse, or advocate for a project. Moreover, an EIR cannot be expedited for the convenience of the city or the project's sponsors. For these reasons the integrity of the EIR must be beyond dispute or question. The project sponsors do not have an exclusive right to define the project. The City of Sacramento must ensure the concerns of all parties interested in the project are fairly addressed. Therefore, the integrity of the EIR is best assured by a thorough, rigorous analysis of the issues identified in this letter.

Very truly yours, thin 2. Haver

Arthur E. Bauer

cc: Rachel B. Hooper Shute, Mihaly & Weinberger, LLP

Enclosures

Gmail - Formal public comment on NOP.

https://mail.google.com/mail/u/0/?ui=2&ik=b58b7d68e9&jsver=L...

For Tom Buford



Eric Baugher

Formal public comment on NOP

Eric Baugher -Draft To: tbuford@cityofsacramento.org

300 Richards Blvd, 3rd Floor Sacramento, CA 95811 Fri, Jul 6, 2018 at 11:02 AM

COMMUNITY DEVELOPMENT DEPARTMENT

JUL 6 2018

RECEIVED

Objection to the use of the word "Abandoned".

Mr. Tom Buford, Manager, Environmental Planning Services City of Sacramento, Community Development Department

I object to referring to regional transits four mile section of track as "abandoned". From around 1985 when regional transit purchased the track, it was designated for transportation use. It was not until 2015 that RT declared the tracks "surplus to transportation use". This act started the current abandonment process which has not yet come to completion.

Although rail road right of way laws can be complex a general rule of thumb is that if the tracks are still in place the abandonment process is not yet completed. In rail road terms tearing up the tracks is called "consummation" of the abandonment. If the tracks are gone the right of way has become an abandoned right of way.

Now that it has been decided to do a complete EIR and alternatives are being considered to ripping up the tracks it would be more correct to refer to the tracks as being "proposed for either preservation and maintenance and possible future use or alternatively for anandonment".

You can read a detailed history of the line and how it was unabandon in 1985 by going to DelRioTrail.info

The editors of DelRioTrail.info had input on the California State Railroad Foundation scoping letter and support it completely. They believe one really good scoping letter can carry more weight than several less well thought out ones.

Eric Baugher

eric Baygle



SacRailActionGroup@Gmail.com

Art Fluter Sacramento Rail Preservation Action Group

COMMUNITY DEVELOPMENT DEPARTMENT

JUL 6 2018

RECEIVED

July 4, 2018

Via USPS and Email

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I have now lived in the Sacramento area for over 5 years. One of the many charms of the Sacramento area is our rich history and contributions from the railroads, starting from the Central Pacific, the Southern Pacific, the Union Pacific, and now the Sacramento Southern. As a rail fan, I became a docent at the California State Railroad Museum (CSRM) and a car attendant on the Sacramento Southern Railroad (SSRR). In my docent role with the public, I have met and talked with thousands of people from every corner of Sacramento, California, and the world. Local and foreign visitors are astounded at our collective respect, care, and interpretation of our rail history.

In my experience, there is universal enthusiasm for the SSRR and its ongoing extension to the south. The recently completed extension of the SSRR to the Sutterville Road Zoo was met with cheers. The possibility of excursion trains going further south from Meadowview to Hood repeats that excitement. The universal question I receive from the public is "When?" When I mention that the City is trying to take out the rails, the next universal question is "Why?"

And that is truly the question. Why is the City bowing to the selfish pressures of a few rich, powerful, and vocal people at the cost of destroying forever a unique historical resource that attracts people worldwide that is owned by over 30 million Californians?

Here are some issues that should be included in the NOP for the pending EIR for the Del Rio Trail initiative:

DO NOT PLACE A TRAIL BETWEEN EXISTING RAILS! This creates a dangerous and possibly fatal precedent for children of all ages. Habits learned walking between rails on the Del Rio can be and are fatal when said children of all ages walk between the tracks of an active railroad. All railroad safety programs such as those from the SSRR and our local UPRR state "DO NOT WALK BETWEEN THE RAILS." Making only this one change will probably save more lives than any other change. Persisting in this is going to get someone killed.

From: Mr. Art Fluter, Sacramento Rail Preservation Action Group To: Mr. Tom Buford, Manager, Environmental Planning Services City of Sacramento July 4, 2018

THE SSRR/WGBL QUALIFIED FOR INCLUSION ON THE NATIONAL REGISTER OF HISTORIC PLACES: As such, the line deserves the protection and the respect of all Californians and is a historic resource under both state and federal law.

A PIECE OF RAIL IS NOT PRESERVATION: Preserving just a portion of the SSRR rails is an insult to the history of California. The railroad is not a static object such as single piece of rail. Fully preserving a railroad requires that it be preserved as a system; a system consisting of the operating rail equipment, the rail tracks, the right-of-way, and the schedule to which it operates. As much as possible of the original line should be included to preserve the historic nature of the SSRR.

THE CSRM AND THE CSRM FOUNDATION (CSRMF) FULLY SUPPORT THE DEL RIO TRAIL: The CSRM and the CSRMF fully supports the Del Rio Trail and has done so since the trial concept was unveiled. The CSRM, CSRMF, and SRPAG all support the transportation benefits of the trail for walkers and bikers.

NEGATIVE IMPACTS ARE OVERSTATED: I believe that the emotional negative impacts put forward by some groups are overstated and/or just plain wrong. The SSRR is a Class 3 railroad and closely regulated by the Federal Railway Admission. Most if not all of the real objections based on facts can be easily mitigated with well established methods, procedures, and technologies.

THE SOUTH LAND PARK NEIGHBORHOOD ASSOCIATION (SLPNA) IS PROVIDING FALSE INFORMATION: Much of the alarmist information propaganda coming from the SLPNA is either wrong, highly exaggerated, or just taken out of context. The NOP and the EIR must examine each of these spurious claims for what they are, then in each case, document the truth.

SPLNA "LOSS OF HOUSE VALUE" IS ANOTHER FALSE FACT: Those who live near the rails moved there with the full knowledge they were buying near railroad tracks. The proximity of the track is listed in the disclosure section of their deeds. The price they paid undoubtedly reflected the possibility that the tracks may be used again.

THE SPLNA SPECIFICATIONS FOR THE DEL RIO TRAIL AMOUNT TO A PRIVATE BACKYARD AMMENITY: The linear park nature of the Del Rio means that public access will be limited while SPLNA members will have convenient and private backyard assess. Quoting from SPLNA's *Del Rio Trail Adopted Policy Position* dated November 2, 2016, the SPLNA requested "parklets, community gardens, winding routes, natural settings, incorporate native plantings where possible, plus benches".

THE PROPOSED TRAIL CONCEPT IS A COSTLY AND UNNECESSARY: The multiple trails running along the Del Rio are costly and totally unnecessary. A single-use paved walking/biking path with a granite gravel running path is less costly and a proven solution. A perfect example is the SSRR rail/trail between Miller Park and south to Baths near the 15 bridge where trains, train crews, maintenance of way equipment, bicycles, walkers, runners, and the occasional dog all safely and efficiently share the same rail/trail.

INCREASED RAIL INSPECTION WILL LOWER CRIME AND HOMELESS ABUSE: The Federal Government requires a railroad to inspect its track on a timely, usually weekly, basis. As such, increased SSRR maintenance presence will help keep the tracks clean of debris and weeds. For adverse homeless person encounters and encampments, California State Park Rangers are available to assist as required.

SUPPORT RAIL CONTRIBUTION FOR SACRAMENTO HISTORY: I support a design that recognizes the railway's contribution to Sacramento's history. The Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) was in operation from 1909 to 1978. As an excursion railroad, the SSRR has been in operation for over 30 years with over 3 million riders. This historic artifact belongs to all Californians, wherever they live.

From: Mr. Art Fluter, Sacramento Rail Preservation Action Group To: Mr. Tom Buford, Manager, Environmental Planning Services City of Sacramento July 4, 2018

BIKE/PEDESTRIAN/TRAIN COMBINED USE: I support the combined operation of railroads, bicycles, and pedestrians as it is safe for all. The SSRR railroad has been operated close to pedestrians, bicycles, and auto traffic without incident for over 30 years. This includes operation in Old Town, crossing the Tower Bridge, and the parallel bike/pedestrian/rail trail from Miller Park south to Bath and Sutterville Road. In the US, thousands of miles of mixed rail/trail are safely in operation today.

A POSITIVE AND IMPORTANT TOURIST ATTRACTON FOR SACRAMENTO: I support the return of rail operations as a great promoter of our local culture, and as a great generator of sales and tax revenue for the city. Rail operation will create an internationally recognized attraction and amenity bringing visitors from around the world. Every one of those visitors potentially buys gas, parks their car, rides the RT, eats one or more meals, and sometimes stay in local hotels. More importantly, those visitors who come for the railroad experience may discover the appeal of other Sacramento amenities and cultural attractions and decide to return to spend more time and money in the area.

LIMITED USE OF THE CORRIDOR IS PLANNED FOR THE IMMEDIATE FUTURE: I support the use of the corridor to position rail equipment between Old Town and new station in the Meadowview/Pocket Road area. As such, only a few train movements per month are anticipated. Actual operation is years in the future.

CALIFORNIA STATE RAILROAD MUSEUM FOUNDATION: I support the points made in the CSRMF's scoping letter.

IF THE CITY PULLS THE RAILS, YOU MUST PROVIDE RAIL CONNECTION MITIGATION: If the RT corridor rails are pulled, the City has effectively cut the SSRR in half. We would have no way of moving equipment from the north end of the SSRR in Old Town and the Sacramento Rail Yards to our projected station in the Meadowview area so we can stage excursion trains south to Hood. All rail equipment must be serviced and maintained and all tools and services are only available in the shops at the Rail Yards. A possible City mitigation would be to connect our northern tracks to the appropriate RT tracks, and then connect those tracks to our railhead at Meadowview at a cost of millions.

Sincerely.

Art Fluter Sacramento Rail Preservation Action Group



Tom Buford, Manager Environmental Planning Services City of Sacramento 300 Richards Blvd, 3rd Floor Sacramento, CA 95811

RE: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I understand the City of Sacramento is preparing an EIR concerning the use of the Sacramento Southern Railroad Right of Way for a Bicycle-Pedestrian Trail.

This document should point out the Historical Significance of this route, which qualifies for inclusion on the Nation Register of Historic Places.

I also understand that residents along the railroad right of way oppose Sacramento Southern's historic operation as a tourist attraction. The right of way, with tracks, existed prior to their purchase of housing and they had no reason to assume that future operation would not resume since they have no ownership interest in the right of way.

The occasional railroad operation will be less of a problem to them than the path with night use and motorcycles, scooters, etc.

However, both can exist together. The Sacramento Southern currently exists adjacent to a bicycle and pedestrian path, which extends from Old Town to south of Miller Park, with no safety problems.

Any path should not be placed between the rails for obvious reasons, as it would provide a bad example for any track, encouraging dangerous habits and practices.

The extension of the Sacramento Southern Railroad is a positive and important tourist attraction, which is good for Sacramento and the preservation of an irreplaceable piece of transportation history.

I support a design that recognizes the railroad's contributions to Sacramento's history. The original railroad operated from 1909 to 1978 and the subsequent tourist railroad has been in operation for over 20 years with over 3 million riders.

This historic artifact belongs to all Californians, where ever they live, as opposed to the few protestors who have expressed their concerns.

Thank you for your consideration.

Yours truly Stanford E. Davis, P.

Paul Ashley Helman

July 5, 2018

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford,

I have lived in Sacramento for the large majority of my adult life, moving here in 1973 for work opportunities. Since that time, I have busied myself in raising a family, working locally and being involved in the community as time availability and resources allowed. I currently meet my personal obligations for community service as a volunteer at the California State Railroad Museum, a local gem that generates considerable interest, income and respectability for the City of Sacramento and the region. Many people come to Sacramento for the expressed sole reason of visiting this world class and extremely noteworthy museum. One program of the museum is an excursion train running South out of Old Sacramento using a rail line that eventually reached Walnut Grove and was first put into operation in 1909 to service the farming communities in the Sacramento Delta region. It would be a marvelous addition to the attractions of Sacramento and the region for a greater portion of this line to be used in educational and explanatory purposes by the local population and out of town visitors who are important to the economic engine of the overall community.

The eventual return of this rail line to service is jeopardized by aspects of a current project you are working on, the Del Rio Trail project. This project will permanently remove the historic rail connection between Sacramento and the important historic Delta farming region it once served. Once broken this potential historic attraction to the Sacramento region will be lost.

I want you to know that I personally support the concept of future train operations on the historic rail line connecting the City of Sacramento to the Sacramento Delta area, and to be specific, I oppose any changes at any point to this rail line that precludes the eventual return of this historic rail line to operation.

Some concepts that should be considered in the current work you are doing, the Del Rio Trail initiative include:

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. The historical route of the Sacramento Southern and the rails are a vital part of Sacramento's heritage. These assets are too valuable to lose simple because of a vocal minority want to forever foreclose the possibility that nothing will ever run on those rails again.

In the city's planning of the Del Rio Trail, please do nothing that will frustrate possible future uses of the rails.

Sincerely,

Mark W

Mark W. Jones, Locomotive Engineer, Amtrak Sacramento

MW Jones

Anthony Gane

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

Re: Preserve the rails in Sacramento

Dear Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. The historical route of the Sacramento Southern and the rails are a vital part of Sacramento's heritage. These assets are too valuable to lose simple because of a vocal minority want to forever foreclose the possibility that nothing will ever run on those rails again.

In the city's planning of the Del Rio Trail, please do nothing that will frustrate possible future uses of the rails.

Sincerely,

Carthing Mane

Anthony Gane

July 1, 2018

Mr. Tom Buford, Manager Environmental Planning Service City of Sacramento, Community Devel. Dept. 300 Richards Blvd, 3rd floor Sacramento, ca. 95811

Re: Del Rio Trail Notice (NOP) of an Environment Impact Report (EIR)

Dear Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. This historical route of the Sacramento Southern and the rails are a vital part of Sacramento's heritage. These assets are too valuable to lose simply because of a vocal minority want to forever foreclose the possibility that nothing will ever run on those rails again.

There are several issues that should be considered and included in the NOP for the pending EIR for the Del Rio Trail initiative:

- The trail should NOT be between the existing rails. This is too dangerous
- The Sac Southern/Walnut Grove Branch line ran for over 30 years serving 3 million riders. If, eventually this could be reactivated in could serve even more people.
- Having combined use of the Trail for bikes and pedestrians as well as the railroad would greatly ensure safety for all who use it.
- Sales tax and revenues generated for the city by tourists who come from all over the world as return of the attraction of rail operations provide promotion to our local culture.
- The Sac Southern is closely regulated by the Federal Railway Admission and as such must maintain the regimen of a Class 3 railroad. The amount of trains traveling in certain neighborhoods is practically nil and to deny the use for a majority simply to satisfy some emotional groups seems counterproductive.
- With the limited use of the Corridor planned for the future, only a few train movements per month are anticipated and any operation is years in the future.

I hope these points will be considered in making your decisions on the Del Rio Trail and hence the beneficial outcome for many will be realized.

Sincerely,

tile hete

Kati White Docent/Sacramento Southern Railroad

2714 Kingfisher Lane Lincoln, CA. 95648

July 3, 2018

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

RE: Del Rio Trail Notice of Preparation of an Environmental Impact Report

Dear Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. The historic route of the Sacramento Southern Railroad and the rails are a vital part of Sacramento's heritage and California history.

These assets are too valuable to lose simply because a vocal minority wants to the end the potential of the rails being revitalized. As Sacramento is reshaping its downtown to become a "tourist destination", this vocal minority should not inhibit the impact that this rail operation will generate for all Californians. An open Right -of-Way will not only promote state and local culture, but will generate sales and tax revenue for Sacramento.

When planning use of the Del Rio Trail, please do nothing that will obstruct use of the rails.

Thank you for your consideration,

eun

Leonard Cassieri

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I have been greatly distressed by the news that the SSRR tracks may be removed beyond Sutterville Road.

The Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) was in operation from 1909 to 1978. As such, it is part of Sacramento history. As an excursion railroad, the SSRR has been in operation for over 30 years with over 3 million riders. This historic artifact belongs to all Californians, wherever they live.

The SSRR railroad has been operated close to pedestrians, bicycles, and auto traffic without incident for over 30 years. This includes operation in Old Town and the parallel bike/pedestrian rail trail from Miller Park south to Bath and Sutterville Road.

I believe that the emotional negative impacts put forward by some groups are overstated and/or just plain wrong. The SSRR is a Class 3 railroad and closely regulated by the Federal Railway Admission. The SSRR has an excellent safety record and reputation with the citizens of the greater Sacramento area.

Please save the rails for future generations.

oblen

Robert J Lee

Gmail - Your Action Is Needed Now ... Gmail - Your Action Is Needed Now ...

Dear Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. The historical route of the Sacramento Southern and the rails are a vital part of Sacramento's heritage. These assets are too valuable to lose simple because of a vocal minority want to forever foreclose the possibility that nothing will ever run on those rails again.

In the city's planning of the Del Rio Trail, please do nothing that will frustrate possible future uses of the rails.

Name: GLATER -18R4

July 3, 2018

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

Dear Mr. Buford,

I am writing in response to the Notice of Preparation for an Environmental Impact Report regarding the Del Rio Trail Project.

Let me start by saying that I believe the idea of a multi-use trail along the proposed corridor is a good one. I'm in favor of additional trails for use by bicyclists and pedestrians.

I'd like to ask that in considering the impact of this project that you also consider creating it in such a way that it does not preclude future use of the corridor for rail traffic. Railroading is a significant part of the cultural history of the Sacramento region. We already showcase this history at the California State Railroad Museum, and tourists from around the world come to see this world class attraction and learn of the history of Sacramento, the Gold Rush, and the railroads.

I feel that a multi-use trail could be designed that would allow for the corridor to be used for pedestrians and bicyclists while still allowing for future rail right-of-way. The current excursion trains run by the Railroad Museum are an example of the safe operation of trains near pedestrians.

Once rail right-of-way is lost it is almost impossible to get it back – that part of our history will be gone forever. Please help preserve this cultural and recreational asset so that future visitors might be able to enjoy an extended rail experience along this corridor.

Best Regards,

prRM

Chris Moore

July 6, 2018

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

Please consider these issues in the Notice of Preparation for the pending EIR for the Del Rio Trail Initiative:

1. A design that recognizes the railway's IMPORTANT contributions to Sacramento and the State of California's history and preserves the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail. The historical route of the SSRR and the rails are a vital part of Sacramento's heritage. These assets are too valuable to lose.

2. The COMBINED operation of railroads, bicycles, and pedestrians. There are thousands of miles of mixed rail/trail in the United States operating safely, including the Sacramento Southern Railroad for over 30 years.

3. The return of rail operations as an attraction for tourists from around the nation and world. People love trains and train rides - a promising potential for generating more revenue from tourism for California.

4. The POSITIVE IMPACTS for the community far OUTWEIGH the negative impacts raised by some groups with select interests. Their interests will forever foreclose the possibility that these rails will ever be operational again! The SSRR is a federally regulated and safety has always been one of their highest priorities.

5. Placing the trail between existing rails is **dangerous**, and possibly fatal, precedent.

6. The use of the corridor to position rail equipment between Old Sacramento and a Pocket Road area station. Only a few train movements per month are anticipated and any operation is years in the future, but would not preclude the possibility of that event.

7. I fully support the points made in the California State Railroad Museum Foundation's scoping letter. <u>Please do nothing that will frustrate the possible future uses of the rails</u>.

Remolds Heather Reynolds

Brad Reinschell

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

Dear Tom Buford:

I recently moved to the South Land Park area of Sacramento along the proposed Del Rio Trail project. Unfortunately, I missed the initial planning stages of the project but have been catching up with the developments as the rear yard of my property abuts directly to the proposed trail. I use the trail multiple times a day to run errands and exercise. The trail is one of the best parts of moving to the area and heavily influenced my decision in purchasing the property. It provides the residents of the area the ability to avoid car trips and prevents them from walking along Del Rio Road which lack sidewalks on some parts of the road. I have also noticed a sense of community pride in the trail evidenced in the friendliness of people along the trail. Neighbors picking up trash and mowing parts of the trail in their free time. The trail is a great asset to the community and worth preserving as a bike and pedestrian trail only.

I recently received a message about the Trail EIR being prepared by the City. Interested parties would like parts of the trail to be redesigned to accommodate train rail flangeways on all intersecting streets. I would like to disagree with the interested parties about the flangeways. These will create a hazard for bicyclists and pedestrians alike. Especially at road crossings there is a chance which tires or feet may become stuck in the flangeways potentially causing harm. A redesign was proposed to direct traffic at 90 degrees at these points, but this proposal seems unnecessary and has the potential to cause confusion and harm if someone on a bike or walking is not aware of the turns. If a train is not to be used on the tracks, then the redesigned 90 degree crossings are irrelevant. Making intricate crossings inconveniences the multitude of people using the trail every day for future rail traffic which does not exist.

There has been discussion about the potentiality of future trains being able to use the tracks. I am also opposed to this idea. The maintenance of the tracks would be a concern for many reasons. The tracks

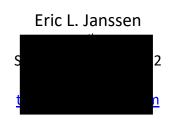
Tom Buford 06/14/2018 Page 2

would most likely be serviced at night which would disrupt hundreds of neighbors during dinner and/or bed time hours. Pesticides would most likely be sprayed along the tracks to mitigate weeds. Personally, I am a proponent of organic gardening and do not want pesticides and the potential exhaust from the train to drift onto my property. While walking along the trail I have seen multiple types of butterflies, birds, and animals along the trail which would also be affected by pesticides. I'd also mention the many trees and flowers which have grown along the trail which provide a habitat for the wildlife. I would be concerned about the potential negative health effects from pesticides and exhaust on humans. Another concern would be vibrations caused by rail use. I am greatly concerned about damage caused to my property due to rail use vibration. Trains, especially vintage trains, are not the sleek versions of modern day transportation.

In summation, I urge the City of Sacramento to stay the course on the original design intent of the trail and crossings. The original design was achieved through efforts of the community, City officials, and State input. Changing the original design for a train to nowhere seems counterproductive and unnecessarily costly. The Del Rio Trail has become a source of convenience for hundreds of neighbors living in the area who take the trail to shop, exercise, experience nature, and take pride in their City.

Sincerely,

Brad Reinschell



July 9, 2018

Via email to tbuford@cityofsacramento.org

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

Re: Comments on Notice of Preparation of an EIR for the Del Rio Trail Project

Dear Mr. Buford

I am writing to you on behalf of myself and my children to express my strong support for the Del Rio Trail Project (the "Project"). My backyard fence line backs up to the proposed route of the Project and my support for the Project lies in the fact that it is the right and smart thing to do with the land, I would use the trail to get to work in Midtown, and my children would use the trail to get to school. In short, I believe the Project will have a direct, positive impact on my family's standard of living.

Due to the press of time, I have organized these comments as an outline. I am happy to provide further clarifications at your request.

1. Background

- a. It is my understanding that the Project has been in a previous general plan for the City of Sacramento. Now is the time to move ahead with the Project.
- b. Excursion Train. The State Parks Department had planned to run an excursion train along the path of the disused railroad tracks. It is my understanding that this excursion train proposal was removed from consideration.
 - It is also my understanding that another train interest group has expressed a desire for the Project to include train travel consideration and possible development. The Project is incompatible with train travel due to many factors. The EIR should address this incompatibility and include a no-train alternative in its analysis.
- 2. Issues for consideration in the EIR Safety, Lighting
 - a. Street crossings, in particular 43rd Avenue/Blair Avenue and Fruitridge Road will need special attention the EIR should include consideration of grade separated crossings at particular locations where the Project intersects with roadways.

Mr. Tom Buford July 9, 2018 Page 2

- i. 43rd Avenue/Blair Avenue
 - 1. Traffic can be both heavy and fast heavy at times when school begins and ends, and fast at other times. Despite a stop sign at 43rd Avenue and 13th Street and the 30 mph speed limit, cars regularly drive over 40 mph along this street when the traffic is not heavy.
 - 2. The curve of the street near the Project is an added danger issue. Visibility and safety at this intersection should be thoroughly analyzed.
 - 3. The EIR should include a risk analysis weighing the cost of undergrounding the trail at this street (cf. bike tunnels in City of Davis) against the cost of litigation if/when an accident occurs here.
- ii. Fruitridge Road
 - 1. More so than 43rd/Blair Avenue, the intersection of the Project and Fruitridge Road presents an acute problem because of the speed of vehicular traffic, volume of traffic, the curves of the street and the raised grade of the street.
 - 2. If not properly addressed, I fear there will be fatalities here simple flashing warning lights will not be enough. This intersection requires grade separation of the trail's traffic from automobile traffic along the roadway to adequately address safety for all users.
 - 3. The EIR should include analysis of two options to address safety concerns: a traffic light option and a tunnel option. The EIR should also include a risk analysis weighing the cost of undergrounding the trail at Fruitridge Road against the cost of litigation if/when a fatality occurs here.
- b. Lighting for the Project
 - i. I do not support overhead lighting of the trail due to the light pollution it creates and the proximity of the Project to homes. The EIR should address the aesthetic/visual impacts of overhead lighting on the neighborhood.
 - ii. I would support ground level lighting of the trail, but I cannot make any recommendations in this regard at this time. The EIR should include an analysis of ground level lighting options that could address both safety concerns and light pollution/visual impacts.

I thank you and your staff for your time in reading my abbreviated comments. I am happy to respond to any questions you may have. I look forward to participating in the EIR process and seeing the Project come to fruition.

Respectfully,

July 6, 2018

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

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Barbara Reynolds	Barban Reynolds

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

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SUPPORT RAIL CONTRIBUTION FOR SACRAMENTO HISTORY: I support a design that recognizes the railway's contribution to Sacramento's history. The Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) was in operation from 1909 to 1978. As an excursion railroad, the SSRR has been in operation for over 30 years with over 3 million riders. This historic artifact belongs to all Californians, wherever they live.

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LIMITED USE OF THE CORRIDOR IS PLANNED FOR THE FUTURE: I support the use of the corridor to position rail equipment between Old Town and new station in the Pocket Road area. As such, only a few train movements per month are anticipated. Any operation is years in the future.

CALIFORNIA STATE RAILROAD MUSEUM FOUNDATION: I support the points made in the CSRMF's scoping letter.

Charles Holmes

July 6, 2018

CERTIFIED MAIL

Mr. Thomas Buford, Manager, Environmental Planning Services City of Sacramento Community Development Department 300 Richards Blvd. 3rd Floor Sacramento, CA 95811-0218

Re: Del Rio Train Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

The Del Rio Trail plan proposes to use the land corridor presently occupied by a railroad right-of-way that was used for rail freight and passenger service in and out of the Sacramento Delta. It is thus a part of the history of agriculture industry support in the region, and therefore also a part of the Sacramento City Farm-to-Fork culture.

The plan proposes a bicycle-and-pedestrian corridor to link access to the Pocket area with the existing bike trail, and thus the rest of the river trail along the east bank of the Sacramento River through and beyond Old Sacramento.

I recommend a design that recognizes the railway's contribution to said Sacramento history, preserves the railroad track structure, and develops adjacent right of way for bicycle and pedestrian service.

There is extensive national, and international experience for operation and management of a railroad service next to a trail for pedestrians and bicycles. See "Rails with Trails, Lessons Learned," references on line, and in publication by the U. S. Federal Highway Administration.

In Sacramento, the California State Railroad Museum has operated the northern 3.5 miles of the Sacramento Southern Railroad (SSRR) as a program of the Museum to interpret the role of railroads in transportation of freight and passengers contributing to the economy and social structure of the City. The operation began in 1984, and has transported over 2.5 million passengers visiting from Sacramento, California, the U.S. and the rest of the world. It is regulated by the U.S. Federal Railroad Administration, including track, equipment, locomotives and operating crewmembers.

Mr. Thomas Buford, Manager, Environmental Planning Services City of Sacramento Community Development Department Page 2

Preserving the corridor of rail with a bicycle and pedestrian way would permit the SSRR to establish and support an additional interpretive service south from the Pocket Area into the delta, including providing access to the Stone Lakes National Wildlife Refuge area. This service would permit additional wildlife viewing and interpretation along with interpretation of the agricultural region there.

The SSRR has never proposed a passenger-occupied train service on the corridor. As an interpretive project, it has no interest in carrying carloads of passengers past the rear yards of private residences. The purpose of the preserved rail corridor would be to move equipment between the southern service (described above) and maintenance in the Sacramento Locomotive Works buildings in the Railyards Project. Motive power will be Diesel-Electric.

There will be no operation of steam-powered locomotives on the corridor, since logistical support of such motive power does not exist within it. Movement of equipment would be on an as-needed basis to comply with Federal regulations and industry practices.

Over the past several years, individuals and at least one organized group in the South Land Park neighborhood have published information about railroad motive power, operating service, and impact. That material is not based upon correct information about practical, regulation-based railroad operations, or any actual planning, or operating policy currently followed or planned. Indeed, some of the information can be easily shown to be false.

When operating a rails-with-trails project, two entities cooperate in maintaining the corridor. The railroad inspects the right of way at least weekly, independent of any actual railroad train or locomotive movement over the line. The right of way is kept free of vegetation through regular, County-of-Sacramento approved vegetation control. The expense of this maintenance is borne by the Railroad Museum and its cooperative association: California State Railroad Museum.

The bicycle-pedestrian area is maintained by local government—in this case, the City of Sacramento—at taxpayer expense. The two agencies work together to make the corridor work—as has been the case north of Sutterville Road, and into Old Sacramento. This partnership has been successfully repeated on other such routes. We propose to work under the same type of agreement and in-field cooperation.

Mr. Thomas Buford, Manager, Environmental Planning Services City of Sacramento Community Development Department Page 3

The California State Railroad Museum Foundation has published a letter addressing the corridor preservation issue that has been further described herein. I support the material in that letter, and urge consideration of it and the above-stated information, of which I have personal knowledge and experience.

Very truly yours

Richard N. Noonan

July 6, 2018

Mr. Tom Buford, Manager, Environmental Planning Services City of Sacramento, Community Development Department 300 Richards Blvd, 3rd Floor Sacramento, CA 95811 Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. The historical route of the Sacramento Southern and the rails are a vital part of Sacramento's heritage. These assets are too valuable to lose simple because of a vocal minority want to end the possibility that nothing will ever run on those rails again.

My father, Charlie Pillman, is a life-long rail advocate, and tour guide at the California State Railroad Museum. Charlie is an 86-year-old Sacramento County resident who has personally conducted over 1,700 museum tours. I am writing on his behalf in support of the position held by the Museum Foundation.

Further, I recently served on the board for the American Institute of Architects, Central Valley Chapter. We regularly vetted issues such as this in the City of Sacramento, and it is my personal opinion that the negative impacts are highly overstated and inaccurate.

In the city's planning of the Del Rio Trail, please allow for the possible future uses of the rails.

Kind regards,

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July 6, 2018

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford,

I have lived in Sacramento since 1981. Since that time, I have mainly worked worked for the City of Sacramento, starting around 1985 as an Administrative Assistant in the Police Department and retiring as the City's Web Manager in 2011. I currently meet some of my personal obligations for community service as a volunteer at the California State Railroad Museum, an internationally known museum that generates income for the City of Sacramento and for the region. As I am sure that you know, the museum runs an excursion train south from Old Sacramento. This historic rail line eventually reached Isleton and was very significant in serving the farming communities in the Sacramento Delta region.

Putting this rail line back into service again would be an additional educational and recreational draw for both local residents and out of town visitors and would also provide economic benefits to our City.

The eventual return of this rail line to service is jeopardized by the current configuration of the Del Rio Trail project. This project will permanently remove the historic rail connection between Sacramento and the still important historic Delta farming region it once served, resulting in this potential historic attraction to the Sacramento region being lost, conceivably forever. This isn't necessary or desirable.

I strongly support the return of future train operations on this historic rail line and I oppose any changes at any point to this rail line that precludes the eventual return of the line to operation.

Some concepts that should be considered the in Del Rio Trail project include:

1. The historic contributions of railroads to the history and development of Sacramento and the region need to be acknowledged and demonstrated. Sacramento was built by, and then grew and prospered due to the railroad's presence here. The nation's first transcontinental railroad started here, right next to where the excursion trains leave Old Sacramento.

2. A multi-use capability of this transportation corridor is safe and possible. The combined use for bike enthusiasts, hikers and train operation is feasible and desirable. The width of the railroad right-of-way is fully capable of accommodating these compatible uses. There is no physical reason that it can't be done.

3. Future rail operations will have minimal impacts on the area because any concerns can be mitigated.

4. And last, but not least, keeping **ALL** of this historic rail line in a multi-use configuration would be a noteworthy attraction for Sacramento and has significant potential for improved sales and tax revenues.

Sincerely,

Bill Taylor

CC: Councilmember Jay Schenirer Council District 5 Mr. Tom Buford, Manager, Environmental Planning Services City of Sacramento, Community Development Department 300 Richards Blvd, 3rd Floor Sacramento, CA 95811

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Signature: Name: Philip A. Holbert

MEIER

Clement F. Meier & Mary Ellen L. Meier 7068 Amberwick Way - Citrus Heights, CA 95621-6444 - USA Telephone 916 961-2510 *** e-mail cfmeier@comcast.net

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CALIFORNIA STATE RAILROAD MUSEUM FOUNDATION: I support the points made in the CSRMF's scoping letter.

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Dear Mr. Buford

I would like to show my support of the California State Railroad Museum Foundation efforts to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. The railway line is an important part of California history and was in operation from 1909 to 1978. I would support a combined operation of the railroad, bicycles, and pedestrians as it is safe for all three.

This valuable asset needs to be preserved as part of Sacramento and California's history. In the city's planning of the Del Rio Trail, please do not allow the rails to be removed.

Sincerely 74

James L. Atkins

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

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From:	Geraldine Monterrubio <gmonbio@att.net></gmonbio@att.net>
Sent:	Monday, July 9, 2018 10:25 PM
То:	Tom Buford
Subject:	Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I am a South Land Park resident and support the City's plan to design the Del Rio Trail so that it will become an asset for the local neighborhood and the City of Sacramento. I find it incomprehensible and suspicious that after years of planning there are suddenly objections to the City's plan.

Having ridden many miles of Sacramento's bike trails, I feel strongly that bicycle and pedestrian paths should be separated as much as possible using preserved rails as a pedestrian path only when needed. Separated bike and pedestrian paths are absolutely necessary for the safety of pedestrians and cyclists.

Running trains anywhere along the proposed Del Rio Trail does not make sense at this point. Too much development has taken place in the area to make this idea plausible. For this reason, maintaining the railroad tracks seems a waste of time and money. Funds would be better spent on enhancing the Trail corridor with trees, shrubs, and providing amenities such as benches, picnic tables and a community garden.

Sacramento has an amazing network of bike and pedestrian trails. Most are concentrated in other areas of the City to the north. It's time for the southern part of the City to to be completely connected to this network and to have more trail options. Let's hope the City's planned design for the Del Rio Trail will help with that.

Thank-you for your attention.

Sincerely,



From:Tom Buford <TBuford@cityofsacramento.org>Sent:Sunday, June 10, 2018 8:49 AMTo:dave neilsenCc:Amy Storck; Jesse GothanSubject:RE: Del Rio Trail Project

Mr. Neilsen:

Thank you for your comment regarding the Del Rio Trail project. Your comment will be included as a response to the Notice of Prepation.

Tom

Tom Buford, Manager Environmental Planning Services (916) 799-1531

From: dave neilsen <a3windmill@yahoo.com> Sent: Friday, June 8, 2018 3:27 PM To: Tom Buford <TBuford@cityofsacramento.org> Subject: Del Rio Trail Project

Dear Mr. Buford,

YAY. Glad to see more progress on the Del Rio Trail. Much needed, can't wait, a safer corridor for north/south travel....

I live in south land park, next door to an empty house, ha, on of the older citizens that is fighting against the trail. He amazes me, how someone in their 90's who doesn't walk or ride bikes can have such passion for fighting it. We also have friends who love the quiet, natural look, and will miss the dirt and weeds when bikes start rolling through there.

Progress. Many citizens, kids and businesses will enjoy the benefits.

I write only to encourage the City to keep on! We have been here only a year, coming from Roseville, where we daily used the Miner's Ravine multi-use trail. Walking, walking with dogs, and riding our bikes. Used it for 8 years. Saw every single kind of disaster possible - from the confused, uninformed, dazed and drunk, chatty stroller pushing dorks, dogs on no leash, long leashes, going against traffic with traffic, in all lanes.... it was always an adventure. So my advice, plenty of signs, decent speed limit suggestions, trash cans, non-english signs?, no sharp corners ever, and wide shoulders to allow for bail outs when dorks collide... and they will....

Again, can't wait, sad to see it take so long to add what most communities would jump at having without all of the worries and resistance. Best of luck to you and your crew!

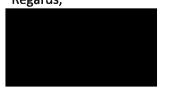
From:	
Sent:	
To:	
Subject:	

Mike Whiteside <mikensac@me.com> Monday, July 9, 2018 9:03 PM Tom Buford; trail@slpna.org Del Rio Trail

Mr Buford,

I live in South Land Park Terrance just a block from the Del Rio railroad tracks.

I support a combined bike/ped/rail trail. I also support maintaining as much of the rails as possible. I do not want to exclude the possibility of future excursion trains using these tracks. Regards,



From:	Rutherford Smith <headwing@att.net></headwing@att.net>
Sent:	Monday, July 9, 2018 7:12 PM
То:	Tom Buford; trail@slpna.org
Subject:	Del Rio Trail

I am a South Land Park resident and I support the City's plan to design the Del Rio Trail so that it will become an asset for both the local neighborhood and the City of Sacramento at large. Specifically:

I support as much separated bicycle and pedestrian path as space allows, including using preserved rails as a pedestrian path.

I support the Trail corridor becoming an urban greenbelt, including retention and planting of trees and shrubs, and inclusion of amenities such as benches, picnic tables, and a community garden.

I support a design that recognizes the railway's contribution to Sacramento I recommend a design that removes the train tracks and provides safe passage for bikes and pedestrians together including school children.

Rutherford Smith

Sent from my iPad

From: Sent: To: Subject: Robin Netzer < Monday, July 9, 2018 5:48 PM Tom Buford; Del Rio Trail Team Del Rio Trail

I am a South Land Park resident and I support the City's plan to design the Del Rio Trail so that it will become an asset for both the local neighborhood and the City of Sacramento at large. Specifically:

I support as much separated bicycle and pedestrian path as space allows, including using preserved rails as a pedestrian path.

I support the Trail corridor becoming an urban greenbelt, including retention and planting of trees and shrubs, and inclusion of amenities such as benches, picnic tables, and a community garden.

I support a design that recognizes the railway's contribution to Sacramento

Robin Netzer

From: Sent: To: Subject: Rutherford Smith < Monday, July 9, 2018 4:09 PM Tom Buford; trail@slpna.org Del Rio Trail

I am a South Land Park resident and I support the City's plan to design the Del Rio Trail so that it will become an asset for both the local neighborhood and the City of Sacramento at large. Specifically:

I support as much separated bicycle and pedestrian path as space allows, including using preserved rails as a pedestrian path.

I support the Trail corridor becoming an urban greenbelt, including retention and planting of trees and shrubs, and inclusion of amenities such as benches, picnic tables, and a community garden.

I support a design that recognizes the railway's contribution to Sacramento I recommend a design that removes the train tracks and provides safe passage for bikes and pedestrians together including school children.

Sent from my iPad

From: Sent: To: Subject: Rob Tocalino <te Monday, July 9, 2018 3:48 PM Tom Buford; trail@slpna.org Del Rio Trail: A Bike Lane Runs Through It

I am a South Land Park resident, whose property is in close proximity to the proposed Del Rio Trail. My family has been longtime supporters of the Railroad Museum. We are also avid cyclists and bike commuters. After considering the many ways this proposal might impact our community, I want to voice our deep support for the City's plan to design the Del Rio Trail so that it will become an asset for both the local neighborhood, the further-flung neighborhoods it will connect to the city's bicycle grid and the City of Sacramento at large.

Specifically:

- I support as much separated bicycle and pedestrian path as space allows, including using preserved rails as a pedestrian path.
- I support the Trail corridor becoming an urban greenbelt, including retention and planting of trees and shrubs, and the inclusion of amenities such as benches, picnic tables and a community garden.
- As avid fans of Sacramento's unique place in railroad history, I support a design that recognizes the railway's contribution to Sacramento but not at the expense of a safe path and trail for pedestrians and cyclists. For this plan to be functional, cyclists and pedestrians must be the singular focus of the design.
- I oppose designing the Trail around the return of train traffic. While we have enjoyed the trains that depart from Old Sacramento, the idea of running them further south than the Zoo is a non-starter. This is a densely populated suburban neighborhood, one many young families like mine have gravitated to for its quiet, safe streets, proximity to parks and the urban core. The return of trains will cause significant negative impacts that cannot be mitigated. In addition, running trains on this section of tracks was recently rejected by State Parks, which would operate the train.
- I oppose maintaining the railroad tracks in a condition designed for train traffic because that will decrease the quality and utility of the Trail and greenbelt for no purpose.
- I support a design that allows for safer crossing at Sutterville Road.
- I do not support the need for flangeways or any other indicator that the track might be used again.
- I support the potential for an excursion terminus near the Sacramento Zoo/Land Park. But, again, I would
 withdraw that support if it in any way limited the design potential of the proposed pedestrian and bike paths.

The High Line project in New York City has resonance here, as it pays tribute to its former use as a Subway line, but also points the way to the city of the future, encouraging residents to interact with it and make it useful again. Imagine if rail enthusiasts had won that fight in the sake of preservation.

In a city that has too long overlooked the potential of our riverfront, this is a project that has a unique ability to bring our urban core closer together and provide unique recreational and transportation benefits.

Thank you for your attention to this important topic.

Sincerely, Rob and Erin Tocalino 1109 La Jolla Way

1

From:	Futuresafety1
Sent:	Monday, July 9, 2018 2:29 PM
То:	Tom Buford
Cc:	b.ebbert@comcast.net; Chip.Oneill@cbnorcal.com; b.backhaus@sbcglobal.net; Nita
	Barve; Phoebe Austin; citizen@futuresafety.com
Subject:	Del Rio Trail & railroad-a brief history
	-

For your consideration:

The last time the train tracks were being practically used South Land Park Dr completely ended at Fruitridge Rd and there was a trestle/bridge over Sutterville Rd. As railroad activity continually decreased to zero the bridge was removed, Sutterville was filled in and raised to the way it is now. The railroad line has been dead for many decades. Fully matured trees have grown all the way down through/into the abandoned line, meanwhile a multi-generational population has continually expanded/increased along with housing development, demand and property values. The concept of bringing back a full sized railroad is not only ill thought out, seriously unsafe, geographically undesirable, but showing all the wisdom of Jurassic Park/re-establishing dinosaurs with all the nightmarish downsides, which is in essence what bringing a functioning, weekly rolling soot bomb, railroad would be to South Land Park.

Sent from my iPhone

From: Sent: To: Cc: Subject: Albert Balingit Monday, July 9, 2018 12:28 PM Tom Buford; Keilani A. Paneda; Devin Lavelle; h-fargo@comcast.net slpna@slpna.org; Kelly F. Rivas Del Rio Trail

July 9, 2018

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I am a South Land Park resident and I support the City's plan to design the Del Rio Trail so that it will become an asset for both the local neighborhood and the City of Sacramento at large. Specifically, I support the Trail because:

•it adds to the complement of much needed separated bicycle and pedestrian paths available in Sacramento, utilizes available preserved rail paths and space, and needs little modification of the neighborhoods/adjacent spaces; •plans for Trail corridor will retain this space as a critical part of an urban greenbelt, including retention and planting of trees and shrubs, and inclusion of amenities such as benches, picnic tables, and a community garden; •design plans will recognize the railway's contribution to Sacramento's history, but not at the expense of a safe path and trail for pedestrians and cyclists; and •my family will use the Trail extensively because for us, there currently are no safe, continuous dedicated north-south bicycle routes leading to downtown Sacramento.

I oppose designing the Trail around the return of train traffic because the return of trains will cause significant negative impacts that cannot be mitigated. The serious impact on air quality around the tracks cannot be ignored with residents adjacent to proposed train routes expected to suffer higher rates of asthma and other breathing disease. Finally, I note that running trains on this section of tracks was recently rejected by State Parks, which would operate the train; making it clear that viability of extending the train routes is highly uncertain.

Albert Balingit,

From: Sent: To: Subject: Jason Murphy < Monday, July 9, 2018 11:54 AM Tom Buford I support the Del Rio Trail!

Good Morning Mr. Buford -

(Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR))

I am a South Land Park resident and I support the City's plan to design the Del Rio Trail so that it will become an asset for both the local neighborhood and the City of Sacramento at large. Specifically:

I support as much separated bicycle and pedestrian path as space allows,

including using preserved rails as a pedestrian path.

- I support the Trail corridor becoming an urban greenbelt, including retention and planting of trees and shrubs, and inclusion of amenities such as benches, picnic tables, and a community garden.
- I support a design that recognizes the railway's contribution to Sacramento's history, but not at the expense of a safe path and trail for pedestrians and cyclists.
- I oppose designing the Trail around the return of train traffic because the return of trains will cause significant negative impacts that cannot be mitigated, and running trains on this section of tracks was recently rejected by State Parks, which would operate the train.
- I oppose maintaining the railroad tracks in a condition designed for train traffic

1

From: Sent: To: Subject: Lois Van Beers Monday, July 9, 2018 11:01 AM Tom Buford; trail@slpna.org Del Rio Trail

Dear Mr. Buford:

My backyard abuts the proposed Del Rio Trail Project. I support the City's plan for a bike and pedestrian path, separated as much as possible. I don't care if the rails are preserved, but if that can be done without taxpayer expense, I would not oppose that.

My children go to Alice Birney School. The trail could be a safe way for them to get to school. Currently there are places on Del Rio Road without sidewalks, so there is no safe way to get to their school other than by driving.

I support the Trail corridor becoming an urban greenbelt, including retention and planting of trees and shrubs, and inclusion of amenities such as benches, picnic tables, and a community garden.

As an avid biker and walker, I am excited that the Trail Project would link to a larger network of trails.

Thank you for your work on this project and consideration of this letter.

Sincerely,



To: City of Sacramento Del Rio Trail Project Committee

From: Elizabeth M. Moseby



July 9, 2018

Dear Committee Members,

Request

I support the Del Rio Trail 100%. However, please deny the tourist trains on the Del Rio Trail Bicycle/Pedestrian Path. For this document I will be referring to the narrowest aperture of the proposed trail/rail line. This portion is in the middle of a 29'9" clearance between property lines. The location of the proposed trail/rail space is between the residential property lines that start at 5861 Block of 14th Street/5860 Park Village Blvd and end at 1411 43rd Avenue and 1491 43rd Avenue where the tracks cross 43rd Avenue. This is a total of 2,472 feet or almost half a mile.

Legally and ethically there is not enough room to safely create a trail that incorporates tourist train activities. Having a train on this section would be an accident waiting to happen.

Statistics and Argument

Per the plan:

"The City proposes to construct 4.5 miles of Class 1 multi-use trail along the abandoned railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road. The proposed Del Rio Trail Project consists of a Class I multi-use trail (12 to 16 feet of pavement with unpaved shoulders ranging from 2 to 3 feet) and when feasible, an adjacent 5 to 6-foot wide unpaved walking trail. The Del Rio Trail would include at-grade crossings and intersection modifications at each location where the trail intersects a vehicular roadway."

(m) The center line of any track constructed in and along a public street shall be at least 10 feet from the property line of said street, or if the street has a lawfully established curb line, such track shall be at least 10 feet from such line.*

Furthermore, between 6017 14th Street/5996 Park Village, the track curves and there would be an even **greater** setback required. (*j*) ... "All side clearance dimensions are for tangent track. In general side clearance for curve track to be 1 ' 0 " greater than that for tangent track."



Portion of Curved Track

Please review the images of the area I have provided and it will become clear to you that not only would putting a tourist train through would be inadvisable, it would be folly. The accidents-maiming and deaths-that could be prevented are self-explanatory. Having the train run through this section of residential area would open up not only the city, but the State of California, and Federal Government who regulates trains for the possibility of lawsuits for wrongful injury and possibly deaths.

Conclusion

Therefore, for safety and aesthetics, as well as protecting the local governments from legal costs, please deny the use of the train tracks for trains. Please do not allow trains to be incorporated into the Del Rio Trail for tourists' "pleasure rides" or trains for any other purpose.

Sincerely,

Mrs. Elizabeth M. Moseby



31.5 Feet (Between 6017 14th Street and 5996 Park Village)



33.8 feet usable space (Between 6141 14th Street and 19 Park Brook off Park Village)

From: Sent: To: Subject:

scott burns < Monday, July 9, 2018 10:13 AM Tom Buford; trail@slpna.org re: Del Rio Trail NOP and EIR

Mr. Tom Buford

City of Sacramento

re: Del Rio Trail NOP and EIR

Dear Mr. Buford:

I am a resident of South Land Park Hills and am writing with respect to the upcoming Environmental Impact Report for the Del Rio Trail project. I live approximately ¼ mile from the proposed right of way. I <u>strongly</u> <u>support the Del Rio Trail project</u>. Construction of the Trail will not only provide adjacent neighborhoods -- and residents of the City generally -- with a quality bike/pedestrian resource that links to other existing facilities, it will also help remedy what is now an abandoned and blighted pathway that is already being used despite its unsafe conditions.

Instead of simply reiterating all of the positive aspects of the trail that you will certainly be hearing from others, I am focusing on public safety aspect because I am a former attorney for the California Department of Transportation and I spent much of my career defending the State against lawsuits predicated upon a dangerous condition of public property, including recreational and semi-recreational trails.

While I respect the historic significance of the existing rail roadbed, I also note that much of the abandoned line has deteriorated over the years. Some rails are displaced, bolts are dislodged, weeds and overgrowth are abundant, ties have rotted. Nevertheless, for years it has been used by local residents as a walking trail, a route to school, or a shortcut. Some cities would respond by fencing it off and forbidding trespassing. I am proud that Sacramento has chosen instead to build a Class 1 facility that will not only allow people to continue using the right of way, but to do so safely and with amenities to encourage even more Sacramento residents to get 4.5 miles of healthy exercise while appreciating the natural beauty and history of the area.

With that said, I need to address the issue that has been raised by some rail advocates of restoring the tracks to facilitate future use of train traffic. While I respect their dreams, restoring the tracks for potential train use would not only greatly increase the cost of the project but also require design changes that sacrifice bicycle and pedestrian safety to support the dream of a future excursion train that was dropped from State Parks 20-year general plan because of poor planning and public opposition; would certainly invite substantial neighborhood opposition again if ever resurrected, and may invite even wider city and regional opposition because of its impacts to environmentally sensitive regions in the South County. This simply does not make sense.

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

July 9, 2018 Re: Del Rio Trail NOP of an EIR

Dear Mr. Buford,

I am a South Land Park resident, and I support the City's plan to design and develop the Del Rio Trail as a community asset. It will support alternative transportation options, greenhouse gas reduction, health and fitness, open space access, and increased safety.

- I support separated bike and pedestrian pathways, and preserved rails to the extent it makes sense for the project and historical richness.
- I support the Trail corridor as an urban greenbelt, strongly urge retaining the maximum number of mature trees and shrubs, and urge including amenities such as benches, picnic tables, secure bike parking, and community gardens.
- I ask the City to consider integrated solar and battery solutions as part of long-term lighting and safety economic evaluations.
- I oppose designing the trail around the return of train traffic for the reasons already on record.
- I oppose maintaining the railroad tracks for any eventual train traffic use as that undermines the long-term purposes and commitment of the Trail and greenbelt.

Sincerely,

Bendan Blue

From: Sent: To: Subject: allticketyboo <allticketyboo@gmail.com> Monday, July 9, 2018 9:03 AM Tom Buford Del Rio Trail

July 9, 2018

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

Dear Mr Buford:

I moved to Sacramento and bought my home in South Land Park about a year ago. I'm very happy to be here, as I love my wonderful neighbors, the excellent public school just blocks away, and proximity to shopping, a great dog park and so on. One of the major selling points to me is the plans to develop the Del Rio Trail into a bike path. I have two young boys, and the Del Rio Trail will offer me and my sons a safe, economical and environmentally responsible way to exercise and enjoy time together while accessing the downtown area and points beyond. As do my neighbors, I specifically support:

- Using as much separated bicycle and pedestrian path as space allows, preserving the rails as a pedestrian path.

- The Trail corridor becoming a much needed urban green belt, including retention and planting of trees and shrubs. Having grown up near the San Fernando Valley, I know well how important green belts really are!

- A design that reflects the historical importance of Sacramento's railroading past, but not at the expense of its healthy and environmentally responsible future of safe paths for pedestrians and cyclists.

I specifically oppose:

- Any notion of returning trains to this track and compromise in trail design to accommodate the return of trains. It is not acceptable to sacrifice the safe transportation and recreation of many for the pointless noise and danger that would accompany the quaint interests of a few.

Sincerely,

Caroline Nilsson

July 9, 2018

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I am a South Land Park resident and I support the City's plan to design the Del Rio Trail so that it will become an asset for both the local neighborhood and the City of Sacramento at large. Specifically, I support the Trail because:

- it adds to the complement of much needed separated bicycle and pedestrian paths available in Sacramento, utilizes available preserved rail paths and space, and needs little modification of the neighborhoods/adjacent spaces;
- plans for Trail corridor will retain this space as a critical part of an urban greenbelt, including retention and planting of trees and shrubs, and inclusion of amenities such as benches, picnic tables, and a community garden;
- design plans will recognize the railway's contribution to Sacramento's history, but not at the expense of a safe path and trail for pedestrians and cyclists; and
- my family will use the Trail extensively because for us, there currently are no safe, continuous dedicated north-south bicycle routes leading to downtown Sacramento.

I oppose designing the Trail around the return of train traffic because the return of trains will cause significant negative impacts that cannot be mitigated. The serious impact on air quality around the tracks cannot be ignored with residents adjacent to proposed train routes expected to suffer higher rates of asthma and other breathing disease. Finally, I note that running trains on this section of tracks was recently rejected by State Parks, which would operate the train; making it clear that viability of extending the train routes is highly uncertain.

Sincerely,

Jargerlyn Duer

Jacquolyn Duerr

From: Sent: To: Subject:

Monday, July 9, 2018 8:26 AM Tom Buford Del rio trail

I am apparently in the minority regarding The TRAIL. I think it will be a disaster for those of us living close to it. I don't trust the city claims to police, patrol and maintain the trail. I believe the homeless population will invade and soil and spoil the trail for all. Our property values are bound to decline. Noise, vandalism and crime will surely increase in our area. If the trail is inevitable I sincerely hope I am wrong, but absent consistent patrols on bicycle or even horseback, coupled with CCTV, I think we will have a lot of problems.

<div><div>Jacqui Koukol </div></div>

From: Sent: To: Subject: Roger Simpson Monday, July 9, 2018 5:30 AM Tom Buford Save the Tracks

Preserving history is a grand thing. Do it right!

Save the rail tracks on the former RT corridor.

Roger Simpson

July 8, 2018

Mr. Tom Buford City of Sacramento

Unlike most other respondents to the NOP, 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 several places.

The Project staff has stated at public meetings that there will be six alternatives. This must surely be a preliminary decision, with both the number of alternatives and their respective themes subject to modification after NOP inputs are reviewed.

A preferred alternative should not be selected before the EIR is prepared, and the analyses of all alternatives should be equally thorough.

Comments on the proposed 2290 Alternative

There exists a presumed proposed alternative, depicted in a file entitled "2290 Overall Exhibit – NEW SECTION REVIEW", which will be referred to here as the "2290 Alternative".

The 2290 Alternative proposes to retain almost all of the existing railroad tracks and construct most of the walking trail within them.

Whether the walking trail can be feasibly constructed within the tracks and whether such a trail would be acceptable to walkers is not obvious. Presumably, the ties and the roadbed material between them would be or would soon become, when cleared of vegetation, an uneven and unsatisfactory walking surface. Placing some kind of trail surfacing between the tracks would be necessary; pavements would not be a good choice. Walkers will inevitably compact and redistribute any non-pavement trail surfacing placed between the tracks, and the tracks may become a tripping hazard. Are there any examples of successful high-usage walking trails between existing tracks? The effective trail width, little more than 4 feet, would be minimal for the many pedestrians who want to walk sociably side-by-side. The trail surfacing would likely be less porous than the existing surface between the tracks, and inadequate drainage might also be a significant problem.

From:
Sent:
To:
Subject:

Cindy Cooke Sunday, July 8, 2018 3:16 PM Tom Buford Support for City's current Del Rio Trail Plan

Dear Project Manager Buford,

I am writing to express my enthusiastic support for the Del Rio Trail Plan in its current form. The proposed trail would be a tremendous benefit to the residents of our city. The trail would allow people of all ages and physical abilities to safely bike or stroll in a section of the city that does not currently have a continuous off street trail. In the neighborhood in which I live, we do not even have sidewalks! So the addition of a dedicated off street trail would be most welcomed. There are no downsides to this trail proposal. It will not have a negative impact on air quality or and it will not increase automobile traffic congestion. It will not negatively impact property values of the homes that abut the proposed trail. And most importantly, the trail will aid in helping our citizens to become more active and physically fit. Sacramento is well suited for biking due to our flat terrain and mild weather. This trail will be well used for decades to come.

I am very much opposed to the proposal to introduce a steam train to the abandoned tracks located with the Del Rio Trail project. A steam train would be an environmental disaster for my neighborhood. The thought of thick black smoke belching into the air, the loud train horns blaring and train crossing bells sounding would really destroy the quality of life for many in my neighborhood. The traffic congestion would be a nightmare at Sutterville Road, Del Rio Road and South Land Park Drive when the train crosses these intersections. It is a five way intersection, and currently the City deems it as a failing intersection due to its high volume of traffic. Adding an excursion steam train to the mix is insanity. The excursion steam train proposal does not serve the greater good. The are no added health benefits to our citizens from operating a steam train in a residential neighborhood. Property values are not enhanced by allowing a steam train to rumble right next to homes. Pedestrian and cyclist safety is not enhanced by running a steam train through a populated residential area. And it is preposterous for rail supporters to argue that homeowners whose property is adjacent to the abandoned rails should have anticipated the tracks would be reactivated for a steam train. The only person who might believe this to be true would be Doc Brown from Back to The Future movie! Steam trains are not something reasonable and sane people anticipate will run through their quiet residential neighborhood in 2018!

I encourage the City of Sacramento to move forward with the the Del Rio Trail Plan in its current form. Thank you for considering my comments.

Cynthia Cooke 5311 South Land Park Drive Sacramento, CA 95822

Sent from my iPad

From:	Leonard 4
Sent:	Sunday, July 8, 2018 12:00 PM
To:	Tom Buford
Subject:	FW: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE DEL
Subject:	FW: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE DEL RIO TRAIL PROJECT (K15165100)

Comments and suggestions as to the appropriate scope of analysis in the EIR Tom Buford, Manager, Environmental Planning Services City of Sacramento, Community Development Department

I have attended several Del Rio bike/pedestrian trail meetings and the engineers at these meeting have confirmed their intention to construct a levee like structure 15'-25' high for a distance of 4/10 mile or more for the proposed trail, east of Darnel way, between the back of the residential properties and the <u>active</u> railroad tracks.

This new structural addition will rely on the use of the old railroad (levee) structure as part of its construction. I was told this new structure will be at the height of the existing railroad tracks. The existing structure consists of a buried creosote train trestle. The trestle is the type of creosote structure that burned near Cal Expo in March 2007 but this one is now buried behind the Darnel Way properties.

No plans or engineering for the section behind Darnel way have ever been presented at these meetings.

I am of the opinion that the Environmental Impact Report will need to include a near complete set of plans and engineering for this intended construction. This will be a major disruption to the neighborhood, wildlife habitat, and will include the removal of trees (including heritage trees) along this corridor.

In my opinion this Environmental Impact Report should include:

- The impact to the neighborhood with the construction of a 4/10 mile levee like structure with an 8' wide paved road/trail on the top of it
- The required removal of all vegetation and trees (including heritage trees) for this construction
- The destruction of wildlife habitat
- Drainage issues in a flood plane
- The new construction disturbing an existing buried creosote train trestle

The "PROJECT NEED" stated in this NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT states in part; "... limited ADA-compliant, active modes of transportation to schools, retail, jobs, and recreational amenities thereby... reducing opportunities for those who do not drive or do not have access to a car including children, the elderly, the disadvantaged, and persons with disabilities."

There has never been any mention "...transportation to schools, retail, jobs, and recreational amenities... ...children, the elderly, the disadvantaged, and persons with disabilities" in any of the meeting I've attended. The trail is rarely near any schools, retail, jobs, and recreational amenities. This trail has been promoted as a vanity project for cyclists.

Thank You

Leonard Rogers

From:	julie rosemarry
Sent:	Sunday, July 8, 2018 11:15 AM
То:	Tom Buford
Cc:	mommy; mo
Subject:	NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE DEL RIO TRAIL PROJECT

Hi this is Thea Yacoub. My family and I think the scope of the EIR should include any impacts to trees along the corridor. The corridor contains heritage oaks and other trees that assist with the privacy of our neighborhood. This area also serves as habitat for many species such as migratory warblers, Nuttall's Woodpeckers and Red-breasted sapsuckers. Impacts to trees should be avoided.

Sincerely, Thea Yacoub and family.

Mr. Tom Buford, Manager, Environmental Planning Services City of Sacramento, Community Development Department 300 Richards Blvd, 3rd Floor <<u>https://maps.google.com/?q=30 0+Richards+Blvd,+3rd+Floor+Sac</u> <u>ramento,+CA+95811&entry=gmail& source=g></u> Sacramento, CA 95811 <<u>https://maps.google.com/?q=30 0+Richards+Blvd,+3rd+Floor+Sac ramento,+CA+95811&entry=gmail&</u> <u>source=g></u>

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. The historical route of the Sacramento Southern and the rails are a vital part of Sacramento's heritage. These assets are too valuable to lose simple because of a vocal minority want to forever foreclose the possibility that nothing will ever run on those rails again.

In the city's planning of the Del Rio Trail, please do nothing that will frustrate possible future uses of the rails.

Name:	_Joe Mikula	

From: Sent: To: Cc: Subject: Bill Wong Saturday, July 7, 2018 2:13 PM Tom Buford Brian Ebbert Opposition To Rail Use on Del Rio Trail

Mr. Buford,

As a resident of the South Land Park Neighborhood on Euclid Avenue, I am strongly opposed to any effort to consider usage of the existing rails for train movement. Use of the rails for train movement will produce excessive noise pollution and pose a threat to public safety in our neighborhood.

Instead, I support the current Del Rio Trail effort. This trail effort more appropriately serves the needs of the residents of the area.

Thank you for taking the time to consider my position on this important matter.

Sincerely,

Bill Wong Former Sacramento City Planning Commissioner Former President of the Sacramento Chinese Community Service Center Former Vice Chair of the Chinese American Council of Sacramento Former Founding Board Member of the Council of Asian Pacific Islanders Together for Advocacy & Leadership (CAPITAL)



Bill Wong LLC 黃健安 首席政治策略師



From: Sent: To: Subject: Joann Cole -Saturday, July 7, 2018 10:26 AM Joann Cole; Tom Buford Re: Preservation of the rails

Mr. Tom Buford, Manager, Environmental Planning Services City of Sacramento, Community Development Department 300 Richards Blvd, 3rd Floor <<u>https://maps.google.com/?q=30 0+Richards+Blvd,+3rd+Floor+Sac</u> <u>ramento,+CA+95811&entry=gmail&source=g</u>> Sacramento, CA 95811 <<u>https://maps.google.com/?q=30 0+Richards+Blvd,+3rd+Floor+Sac ramento,+CA+95811&entry=gmail&</u> <u>source=g</u>>

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation to preserve the rails of the Sacramento Southern Railroad along the proposed Del Rio Trail in Sacramento. The historical route of the Sacramento Southern and the rails are a vital part of Sacramento's heritage. These assets are too valuable to lose simple because of a vocal minority want to forever foreclose the possibility that nothing will ever run on those rails again.

In the city's planning of the Del Rio Trail, please do nothing that will frustrate possible future uses of the rails.

Name:Joann Cole	

From: Sent: To: Cc: Subject: Charles Boley Friday, July 6, 2018 5:30 PM Tom Buford Lukenbill Gregg; Fluter Art California State Railroad Museum - Railroad Right Of Way

I am a long time docent at the museum. I believe Sacramento, State Parks and other vested parties should do everything they can to preserve and expand the right of way. The reason is simple "MONEY." An example of the value of this right of way is in Skagway, Alaska with the White Pass Railroad. It is being sold to Carnival Inc for 296 million dollars (verifiable by Googling it). This is not a misprint. In addition, with support from various civic agencies this railway could be a super asset and treasure for Sacramento and the surrounding communities. Charles R. "Dick" Boley

Sent from my iPhone

From: Sent: To: Subject: Ann Louise Friday, July 6, 2018 4:55 PM Tom Buford Del Rio Trail Opposition

Hello Mr. Buford,

My name is Ann Ford. I own and live a

The tracks are right behind my house.

All I want to ask is this:

Would YOU want a noisy, dirty train, filled with people looking down into YOUR back yard, lowering YOUR property value?

Please.

From: Sent: To: Subject: George Wiley <georgeoglewiley@gmail.com> Friday, July 6, 2018 3:03 PM Tom Buford Del Rio Trail Project EIR

Hello Sir:

I write in support of the City's proposed Del Rio Trail project.

I also oppose any attempt to modify the existing trail plans to provide for the viability of future train traffic on the corridor

I plan to use the trail for recreation and commuting to work. My two sons could also use it to commute to their schools.

The trail will also provide safe routes to businesses, services, and other city amenities. It will also enable many residents to bike to work from south area neighborhoods to downtown.

The reintroduction of train traffic would be detrimental to the health of the community, so all efforts to re-design the trail around future reactivation of the tracks should be rejected

And activating the trail corridor will also reduce homelessness on the right of way with the increased public use.

Thank you for considering these comments.

George Wiley

From:	Mike Roque
Sent:	Thursday, July 5, 2018 4:02 PM
То:	Tom Buford
Cc:	Arthur Fluter; Sacramento Rail Preservation Action Group
Subject:	Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Mr. Buford:

I support the efforts of the California State Railroad Museum Foundation and the Sacramento Southern Railroad to preserve the rails along the proposed Del Rio Trail in Sacramento for the regular operation of excursion trains.

The historic railroad route is a vital and irreplaceable part of Sacramento's rich railroad heritage. This priceless community asset is far too valuable to lose simply because a vocal minority wants to prevent the possibility of the operation of excursion trains forever.

Please ensure that the city's planning of the Del Rio Trail ensures that all possible future uses of the rails are preserved, including and especially the operation of excursion trains.

As a supporter of "rails with trails", I urge you to support excursion trains as well as the trail along this corridor by including the following concerns in the NOP:

DO NOT PLACE A TRAIL BETWEEN EXISTING RAILS! This creates a dangerous and possibly fatal precedent. Habits learned walking between rails on the Del Rio can be extremely dangerous if not fatal when walking on an active railway. All railroad safety programs state walking between the rails is dangerous and causes multiple fatalities every year.

SUPPORT RAIL CONTRIBUTION FOR SACRAMENTO HISTORY: I support a design that recognizes the railway's contribution to Sacramento's history. The Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) was in operation from 1909 to 1978. As an excursion railroad, the SSRR has been in operation for over 30 years with over 3 million riders. This historic artifact belongs to all Californians, wherever they live.

BIKE/PEDESTRIAN/TRAIN COMBINED USE: I support the combined operation of railroads, bicycles, and pedestrians as it is safe for all. The SSRR railroad has been operated close to pedestrians, bicycles, and auto traffic without incident for over 30 years. This includes operation in Old Town, crossing the Tower Bridge, and the parallel bike/pedestrian rail trail from Miller Park south to Bath and Sutterville Road. In the US, thousands of miles of mixed rail/trail are safely in operation today.

A POSITIVE AND IMPORTANT TOURIST ATTRACTION FOR SACRAMENTO: I support the return of rail operations as a great promoter of our local culture, and as a great generator of sales and tax revenue for the city. Rail operation will create an internationally recognized attraction and amenity bringing visitors from around the world.

NEGATIVE IMPACTS ARE OVERSTATED: I believe that the emotional negative impacts put forward by some groups are overstated and/or just plain wrong. The SSRR is a Class 3 railroad and closely regulated by the Federal Railway Admission.

CALIFORNIA STATE RAILROAD MUSEUM FOUNDATION: I support the points made in the CSRMF's scoping letter.

Please officially include my comments on the record as public comment in support of excursion trains on this corridor.

Thanks!

From: Sent: To: Cc: Subject: Wood, Dylan A@Wildlife Thursday, July 5, 2018 1:45 PM Tom Buford Wildlife R2 CEQA Comments on the Del Rio Trail Project (SCH#2018062009)

Mr. Buford,

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation for the Del Rio Trail (Project) in Sacramento County pursuant the California Environmental Quality Act (CEQA) statute and guidelines.^[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. Code).

CDFW ROLE

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

CDFW may also act as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) A project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of a Project as may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code. CDFW also administers the Native Plant Protection Act, Natural Community Conservation Program, and other provisions of the Fish and Game Code that afford protection to California's fish and wildlife resources.

PROJECT DESCRIPTION SUMMARY

The Project would be located on a 4.5-mile stretch from the Freeport Water Tower adjacent to the Interstate 5 bridge over Freeport Boulevard and extending along an abandoned railway. The City proposes to construct a multi-use trail for biking and walking that will join with other new trails such as the Freeport Shores and South Sacramento Parkway West Trails. The goal of the Project is to increase accessibility for the surrounding communities and decease the dependency on vehicular modes of transportation.

The Project description should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

As required by § 15126.6 of the CEQA Guidelines, the EIR should include appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to fish and wildlife resources.

with the provisions of CEQA (Guidelines Section 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will reduce impacts to a less than significant level.

The EIR should discuss the project's cumulative impacts to natural resources and determine if that contribution would result in a significant impact. The EIR should include a list of present, past, and probable future projects producing related impacts to resources under or shall include a summary of the projections contained in an adopted local, regional, or statewide plan, that consider conditions contributing to a cumulative effect. The cumulative analysis shall include vegetation and habitat reductions within the area and their potential cumulative effects.

The EIR should incorporate mitigation performance standards that would ensure that significant impacts are reduced as expected. Mitigation measures proposed in the EIR should be made a condition of approval of the project. Please note that obtaining a permit from CDFW by itself with no other mitigation proposal may constitute mitigation deferral.

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) (16 U.S.C., §§ 703-712). CDFW implemented the MBTA by adopting the Fish & G. Code section 3513. Fish & G. Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Potential habitat for nesting birds and birds of prey is present within the project area. The proposed project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the project footprint and its close vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the EIR. Measures to avoid the impacts should include species specific work windows, biological monitoring, installation of noise attenuation barriers, etc.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: <a href="http://cndbb.gov/cndbb.gov/cndbb/pdfs/cn

http://www.dfg.ca.gov/biogeodata/cnddb/plants and animals.asp.

FILING FEES

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

CONCLUSION

Pursuant to Public Resources Code §21092 and §21092.2, the Department requests written notification of proposed actions and pending decisions regarding the proposed project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670.

I appreciate the opportunity to comment on the NOP to assist in identifying and mitigating Project impacts on biological resources. I am available for consultation regarding biological resources and strategies to minimize impacts. Please contact me with any questions regarding this email.

Sincerely,

From:	Laurie Fong
Sent:	Wednesday, July 4, 2018 2:20 PM
То:	Tom Buford
Subject:	Re: Notice of Preparation of an Environmental Impact Report for the Del Rio Trail Project

Re: Notice of Preparation of an Environmental Impact Report for the Del Rio Trail Project

July 4, 2018

Mr. Tom Buford

City of Sacramento

Community Development Department

300 Richards Blvd, 3rd Floor

Sacramento, CA 95811

Dear Mr. Buford,

I am writing on behalf of myself, my parents who are South Land Park residents, and others in the South Land Park neighborhood too afraid to speak out for fear of retaliation from the opposing view.

I strongly support the city's plan to design the Del Rio Trail so that it will become an asset to both the local neighborhood and the City of Sacramento at large.

The land for the Del Rio Trail is one of the key factors that shaped me into becoming a landscape architect. This land has always been both an asset and a blight to the local neighborhood as it has long stood undeveloped for years. Throughout this time, it has become both wild and beautiful as flora and fauna have quietly been taking it over. As a child growing up in South Land Park, I, along with my brother and sister, explored and played on and around the abandoned land that seemed largely forgotten by everyone except the residents of the neighborhood. As a student of the local elementary school, I even remember taking a school field trip in which my and several other classes walked along the trail for a field trip to the Sacramento Zoo.

Speaking with perspective, I lost my job in Sacramento during the recession, and had to move to Los Angeles to find work. Everyday I, as a landscape architect and now Angeleno, experience the negative impacts of development when it is done too quickly, without foresight towards sustainability, and without concern to the community or connectedness to the surroundings. My visits to Sacramento and the South Land Park neighborhood have become a respite from my life in the highly urbanized Los Angeles.

In such a fast-paced world where everyone wants to be connected to everyone all the time, the subtle nuances and quiet moments get lost in the noise and confusion of wanting to be the first and wanting to get ahead, and before we know it, ideas, values, and freedoms get swallowed up and lost. The undervaluing of parks and open spaces on communities and people is nothing new. In "Last Child In the Woods: Saving Our Children from Nature Deficit Disorder" author Richard Rouv describes how the decrease in exposure to nature in American children has negatively impacted their health and well-being, and that exposure to nature is essential for the health and development of children, adults and society. Parks and open spaces are often easily overlooked when compared to more obviously lucrative investments, and I am fearful that the Del Rio Trail is no different with the proposal to introduce train traffic into the trail design. To redesign the Del Rio Trail from its current focus on bicycle and pedestrian paths to one incorporating train traffic would overshadow the importance of the trail to the overall community and would negatively impact the community it is meant to serve.

From: Sent: To: Subject: Marcia Waechtler < Thursday, June 28, 2018 2:00 PM Tom Buford Fwd: Del Rio Trail Project

Begin forwarded message:

From: Marcia Waechtler Subject: Del Rio Trail Project Date: June 28, 2018 at 1:55:45 PM PDT To: meagan@crockercrocker.com Cc: tbuford@cityofsacramento.org

I received a notice regarding the Del Rio Trail Project and wanted to comment on this project to you and to Tom Buford.

My husband Bruce and I are totally against this project.

Background: I have lived in my home on Moss Drive since February 1975; for over 43 years. When my ex-husband and I purchased our house we made this decision because of the backyard access along the dirt road next to the railroad tracks. We had a boat, trailer and camper and needed this access to get our vehicles into our backyard.

We were here during the time the railroad ran the "sugar beet" train from Clarksburg, which never bothered us.

In the early 80's SP sold the property to RT. When RT took over the tracks, RT came to every homeowner that backed up to the tracks and gave us a key to the lock that they put on the gate. RT was aware that many of the property owners used this access road.

We have been never been led to believe that this access road wouldn't be available for our use; one of the reasons I have stayed at this residence for 43 years!

I have another boat that my current husband and I have that also requires us to have backyard access in order to use it.

We would have to sell our home and move if we don't have the ability to use this access road to bring our boat into our yard.

We see people walk, run, ride bikes along the access area. They seem to be happy enough with this situation without the enormous expense.

There is a lot of wildlife back there: possums, raccoons, skunks, various bird species, including wild turkeys at times.

Please don't change this. We enjoy seeing the old railroad tracks; its nice to have a "trail" to walk along without having it paved and without spending a lot of money.

SMUD, PG & E and other companies use this access road for different work projects.

From:	Guy Danilowitz
Sent:	Wednesday, June 27, 2018 3:04 PM
То:	info@csrmf.org
Cc:	Tom Buford; trail@slpna.org
Subject:	CSRMF opposition to the Del Rio trail

To the Board of Directors of the California State Railroad Museum Foundation:

I have been a member of CSRMF for 7 years. I live in South Land Park and work for the County of Sacramento and use the Del Rio trail to commute to work every day. I called your office last week to express my dismay at CSRMF's position on the Del Rio trail project and was told that no one would speak to me about my issue and instructed to send an email to this address.

I am therefore now writing as a member of CSRMF to express my outrage at the fact that CSRMF is opposing the Del Rio rail project and has issued an unreasonable demand that the City re-design the public trail to accommodate future State TOURIST TRAINS on this public trail corridor.

I am confident the CSRM Foundation membership is opposed to this position and that it is in fact only the position of a handful of CSRMF board members if that, most notably Gregg Lukenbill.

The Del Rio trail project is overwhelmingly in the public interest. There is no public interest in re-designing the trail in a way to accommodate future tourist trains. This clearly a ruse that Mr. Lukenbill has engaged in to block a community project for no other reason than his inexplicable desire to hang on to the past.

Most concerning to me is that apparently Mr. Lukenbill has either directed or encouraged some like-minded individuals to harass folks like myself who use the trail to commute. This harassment has become more aggressive in the last several months as Mr. Lukenbill has re-doubled his efforts to block the trail project. Specifically, I was assaulted several times by an elderly man who told me to "get off the trail" and told me that: "you are not going to get your permit!"

I am requesting that someone contact me as soon as possible to explain why CSRMF has cowed to the whims of Mr. Lukenbill in opposing this project rather than supporting it as I'm sure most of its members do. There certainly has not been any sort of member survey or any other steps taken to determine how CSRMF members feel about this position.

Very truly yours, Guy Danilowitz

From: Sent: To: Subject: Dave O'Toole < Thursday, June 21, 2018 12:04 PM Tom Buford Del Rio Trail Project Comments

Good afternoon, Mr. Buford. I am writing as a South Land Park neighbor and member of the South Land Park Neighborhood Association to express my wholehearted support for the Del Rio bike and pedestrian trail. The Del Rio Trail Project will be a destination-worthy amenity to not just the neighborhoods that adjoin it, but the city and region as a whole. In the same spirit as the Highline of New York City, the Del Rio Trail will activate a long-neglected rail corridor that, while still retaining a natural beauty, has in parts become a dumping ground and hiding place for miscreants.

It is unfortunate that opposition to this trail has emerged from so-called rail advocates and I encourage you and the City of Sacramento to not let that slow your study of this project. SLPNA has already requested the retention of more than 98% of the rails, a substantial accommodation that will dramatically affect the size of the bike and pedestrian way. Given the highly unlikely prospect of any train running through Land Park and South Land Park communities, the scope of this concession cannot be understated. With that concession in place, I now ask that the City of Sacramento move ahead expeditiously with the project.

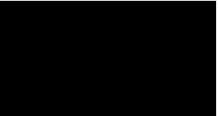
Thank you for your consideration of my comments and I wish you luck with your study.

Sincerely,

David O'Toole

From: Sent: To: Subject: Veronica Ramirez Tuesday, June 19, 2018 9:32 PM Tom Buford Del Rio Trail

Veronica Ramirez



06/19/2018

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

Tom Buford:

I am writing to you regarding the Del Rio Trail project EIR. I am concerned about the future plan to run locomotive trains along the corridor after the Sacramento Zoo. The locomotive train running from Old Sacramento to the Sacramento Zoo is understandable but running the train further past the zoo does not make any sense. The area past the zoo is a residential neighborhood and provides no views or vistas for a tourist train passenger to enjoy like the views from the train while riding along the river. Also this will impede traffic along the already congested Sutterville Road corridor and the stop light at Land Park Drive/Del Rio Road/ Sutterville Road is already a lengthy interchange. A train crossing will only make the congestion on these parts of the road worse. This would be typical for all the crossings further down the Del Rio Trail.

Running a locomotive train through this area would disrupt people's peace and quiet. A loud train horn and rumbling not to mention the shaking that would occur would upset foundations, swimming pools, pets and family activities. The exhaust from the stack would coat people's homes and gardens with soot and pollute the air. This would be different if the future train was a light rail commuter service, but from my understanding it is a coal/wood burning locomotive. The noise and pesticides used for the track maintenance would also disrupt people's lives.

Many residents use the trail to jog, walk themselves and their dogs, bicycle, and head to grocery store. The Trail serves as a connector between streets and reduces car trips around the neighborhood. The Del Rio Trail is a welcome addition to the South Land Park neighborhood. A future train would cause too much disruption through a residential area with no direct benefits to the local community.

Sincerely,

 From:
 Laura Walter <</td>

 Sent:
 Monday, June 18, 2018 4:34 PM

 To:
 Tom Buford

 Subject:
 DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Tom,

I support the City of Sacramento's current plan for the Del Rio Trail Project. I see the current project proposal for a walk/bike trail with a railroad history focus as a wonderful idea for our community and the greater Sacramento community. There are currently 10 elementary schools, 2 middle schools and 2 high schools within a 3 mile radius of the proposed trail. What a wonderful way to bring California history alive for our students by having them walk the trail and learn from the various signs and art installations that relate to rail history in our area. This would be a no cost field trip for these schools, which would allow every student to enjoy. There is also a wonderful visual arts program at McClatchy High School, with incredible student artists, who could contribute art to this project. Just a thought.

I see no historical or educational value to running a train through neighborhoods, where riders would look at fences and backyards. I was at the city council meetings 4 years ago to express my concerns, and I will be there again if necessary.

Thank you for your time,

Laura Walter

 From:
 Jake Henshaw

 Sent:
 Sunday, June 17, 2018 8:18 PM

 To:
 Tom Buford

 Subject:
 DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Mr. Buford,

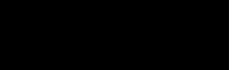
I am writing to support the proposed Del Rio Trail as currently designed and to oppose any revision or action that in any way could possibly lead to train operation on this right of way. As a homeowner in the affected neighborhood, I would appreciate these views being appropriately incorporated in the Environmental Impact Report now being prepared on the proposed trial.

The proposed trial offers a rare opportunity to tie our community and region together by linking existing trails and pathways into a vibrant, non-vehicular network. The Del Rio Trail segment would provide multiple benefits, from reduced traffic congestion and air pollution to safer routes for users, especially school children, and improved health through exercise.

By contrast, the proposed train plan would send rumbling, brake-squealing, smoke-belching locomotives within feet of homes, schools, churches, and parks, invading privacy, polluting air, shaking foundations, and causing traffic backups at rail crossings. It's hard to imagine a more inappropriate use of the proposed trail property in this residential neighborhood. As I recall, the state officially removed the South Land park tracks from its tourist train plans in 2014 and that decision should stand.

California has a great rail heritage that is rightly being honored in many ways, including perhaps the nation's finest train museum in Old Sacramento. As I understand it, the current Del Rio Trail plan would retain 98 percent of the existing track. This is adequate to recognize the historic role of this onetime agricultural spur. I request the city address the above issues in development of the EIR.

Thank you for your consideration, Jacob Henshaw



From: Sent: To: Subject: Bruce Hilliard Sunday, June 17, 2018 3:52 PM Tom Buford Old Sac to Walnut Grove railroad restoration

As a long time City of Sacramento resident and rail fan I greatly support an effort to restore the tourist railroad lines between Old Sacramento and Walnut Grove.

This would be a win-win for both Sacramento and Walnut Grove much like the Durango & Silverton and Cumbres & Toltec lines in Colorado. Small towns in southern Sacramento County along the line would also benefit.

Thank you

Bruce Hilliard Sacramento, CA.

 From:
 Esha Ali

 Sent:
 Saturday, June 16, 2018 9:25 PM

 To:
 Tom Buford

 Subject:
 DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Mr. Buford,

I support the City. I fully support a safe bike and walking trail on the abandoned rail corridor.

However, I absolutely do not support

re-designing these plans to include train traffic. This is a health and safety hazard to our communities living near the tracks such as air and noise pollution, use of pesticides, traffic jams and privacy concerns.

Thank you for your time.

Sincerely, Shafeesha Ali

From:	Craig Chalmers <
Sent:	Saturday, June 16, 2018 7:43 AM
То:	Tom Buford
Subject:	DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Tom,

I **fully support** the City's efforts for the trail and redesign option of the trail for future train traffic!! Trains and their associated rails are an important part of the development of our nation, state, and Sacramento area. So many historic and usable rail ROWs have been lost forever so keeping the options on this one is of the utmost importance. Keeping that history alive for future generations to see and experience is necessary, especially because of our State Train Museum!! Many associated with the SLPNA don't seem to share the historic importance because they have forgotten that we are all a part of a wider and broader community.

Thank you for all your efforts on this Project!

Sincerely, Craig Chalmers



From: Sent: To: Subject: Nat Greeley Friday, June 15, 2018 1:23 PM Tom Buford Del Rio Trail

Hello Mr Buford,

I am a South Land Park resident living at 19 Park Brook Ct, Sacramento. I strongly support the Del Rio Trail project as written and STRONGLY OPPOSE train supporters efforts to redesign the trail to facilitate possible future train traffic. I oppose the possibility of train traffic due to the presence of heavy locomotives that will severely negatively impact my home value, while a community walking and bike trail will increase the value and improve life in our neighborhood and city. I and others are also concerned about train vibrations damaging their pools, patios, and home foundations, loss of privacy, thick smoke from the engines, wheel and engine noise, 110 decibel horn blasts, train collisions with my pets and pedestrians. With so many of Sacramento and South Land Park residents opposed to this plan, you cannot vote to approve any changes that would facilitate this addition now or at any point in the future. A train system in this area would not add nearly as much to the community as it would take from it. Please do not approve any plan other than the Del Rio project as planned (i.e NO TRAIN EVER). Thank you,

Nathaniel and Samantha Greeley

From: Sent: To: Subject: Sara Rogers < Thursday, June 14, 2018 3:47 PM Tom Buford Support for current Del Rio trail plan

I have lived in Sacramento for almost 20 years and have long been disappointed at the lack of access to natural trails - particularly in the south Sacramento area.

As a recent mother I've been excited by the prospect of the Del Rio trail plan and the enhanced access to a walkable nature trail it would provide. I oppose strongly efforts to add a tourist train.

Please continue the plan as previously drafted.

Sara Rogers Fluty

Sent from my iPhone

From: Sent: To: Subject: Jody Wright Thursday, June 14, 2018 5:20 AM Tom Buford RE: Del Rio Trail Project

To my comment below, I would like to add that I emphatically support an exclusive bike and pedestrian trail, not one is that shared with the railroad.

Jody Wright

From: Tom Buford [mailto:TBuford@cityofsacramento.org] Sent: Sunday, June 10, 2018 10:49 AM To: Jody Wright Subject: RE: Del Rio Trail Project

Ms. Wright:

Thank you for your interest in the project, and your comment on the NOP.

Tom

Tom Buford, Manager Environmental Planning Services (916) 799-1531

From: Jody Wright Sent: Sunday, June 10, 2018 10:32 AM To: Tom Buford Subject: Del Rio Trail Project

Dear Mr. Buford,

As a resident of the Pocket area for the past 33 years, I consider the proposed Del Rio Trail to be a tremendous asset to our community. I am concerned, though, about the proposed grade-level road crossings. I'm not sure exactly how many roads will have to be crossed, but certainly there will be crossings at Pocket/Meadowview Road and Florin Road. They are both very busy streets, and crossings there would greatly inhibit traffic. Trail crossings at Florin Road, Gloria Drive, and Riverside Blvd. along Seymour Park in Greenhaven are all bridges that cross those roads. Bridges would also be very necessary crossing roads along the Del Rio Trail as well.

Thank you for your consideration.

Jody Wright

From: Sent: To: Subject: slcmtom -Thursday, June 14, 2018 3:22 AM Tom Buford Train/Trail/Walk way

I think it should should be left alone. Improving the area will bring more people and homeless to the area which will then invite thieves. I live right next to the lot. I love looking out the window and seeing the beautiful trees and hill, makes me think I am in the wilderness instead of around houses. Please don't spend the money we dont have and use the moneies on the schools and parks instead.

From: Sent: To: Subject: Wendy Nordstrom < Wednesday, June 13, 2018 7:17 PM Tom Buford Del Rio train

I am highly opposed 2 allowing train traffic in the Del Rio Trail area. The old trains are loud, noisy, and spit out a lot of pollution. By allowing trains to go through our residential area, it is my belief our neighborhood would be ruined all for someone to make a buck.

The noise, pollution, chemicals and vibrations would destroy our calm and inviting neighborhood. Our children would lose their nature preserve and it would make our area unpleasant.

Please, do not ruin or community with a train.

Thank you.

Wendy Nordstrom

Sent from my T-Mobile 4G LTE Device

To:

From: Carol Nelson < Sent: Wednesday, June 13, 2018 6:10 PM Tom Buford Subject: DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Dear Tom,

This proposed Trail is an expensive project that seems to benefit few. Given our current homeless problem, we see the Del Rio Trail as an open invitation for a new homeless route from the river into our community. Those living next to the trail, or cyclers or walkers with their dogs and children would likely be confronted by homeless folks and their pets who have no place else to go and who are already starting to encamp in our neighborhoods. Unpredictable behavior, crime, noise, needles, drugs, animal waste, fires, panhandling, and garbage - that is unfortunately what accompanies the homeless, through no fault of their own. An open trail like that also invites crime in general. Will there be new City enforcement staff dedicated to the Trail for regular patrols who will also be available on a 24-hour call basis? Also, will the City be maintaining the Trail by hiring new maintenance staff or contractors? The City's Parks Department already relies on volunteer groups to help maintain existing parks, such as Land Park and the Old City Cemetery. As for the alternative commute aspect of the Trail, there are existing bike lanes with direct routes into downtown for those who are truly dedicated to cycling.

A comment about this Trail process. Maybe we missed it, but we don't recall the community group and City ever involving the State of California or the RR Museum Foundation in its process. Yet, they are both important stakeholders, especially given the State of California owns the right-ofway for a key section of the proposed Trail, of which the City and SLPNA have known from the beginning. Expressing surprise and outrage now at the Foundation's involvement at this perceived 11th hour is disingenuous. Of course we understand the expediency of the SLPNA's political approach, but it doesn't make it right.

From: Sent: To: Subject: Giordano, Thomas Wednesday, June 13, 2018 4:11 PM Tom Buford del rio train tracks

Absolutely NO TRAINS should be run on these tracks! What an idiotic idea. I support the bike trail. The impact of trains would be unbelievable to our neighborhood and I cannot believe it is even an option!,

NO TRAINS IN SLP

Thanks

Thomas Giordano

From: Sent: To: Subject: Kate Tharp Wednesday, June 13, 2018 3:27 PM Tom Buford Del Rio Trail

RE: Del Rio Trail

Dear Mr. Burford,

I am a firm supporter of the Del Rio Trail project in it's current form and eagerly look forward to a vehicle-free, city trail for pedestrian and bicycle use. I fully oppose any proposal to incorporate a tourist train in the DRT project. My family are Sacramento residents and my children attend Alice Birney Elementary school, which frequently uses this wonderful natural spot for weekly nature walks. Please retain the current DRT plan without the addition of a tourist train.

Thank you for your time, Kate E. Tharp

From:	John Sugar -
Sent:	Wednesday, June 13, 2018 1:21 PM
То:	Tom Buford
Subject:	Del Rio Trail Project - Support for Including Train Option

Mr. Buford I have read that the State Railroad Museum Foundation is encouraging the city to design the project to allow future excursion trains. I support this proposal

I believe that excursion trains could benefit Sacramento at large, by attracting visitors and giving Sacramento residents the opportunity for scenic train excursions. The State Railroad Museum is a significant attraction for visitors. Longer excursion train rides and potential dinner trains could only increase the Museum's visibility.

The city pledges a considerable portion of its resources to attracting visitors. That was one of the explicit considerations behind public funding for the Arena, and is a central reason for proposed upgrades to the convention center. Given Sacramento's history as a center of railroad activity, attracting visitors with railroad-related activities would be fitting. If the Del Rio Trail can accommodate an occasional excursion train while serving as a neighborhood trail, it appears short-sighted to exclude the option.

I am aware that there are neighborhood concerns regarding trains operating again on the Freeport line. There may be appropriate restrictions on any excursion train operations, such as time of day, number of trains per day, etc. that would address the bulk of the neighborhood concerns. However, there are few options in Sacramento for historical, train-based activities to attract visitors. The Freeport line appears to be unique in this regard. Including the option of excursion trains on the line should be beneficial to our city.

Thank you

John Sugar

From: Sent: To: Subject: Kimberly Rodda Wednesday, June 13, 2018 10:27 AM Tom Buford Del Rio Trail

My name is Kimberly Rodda and I am a concerned voting member of Sacramento. My children attend Alice Birney Elementary. We utilize Del Rio Trail dozens of times a year as a family and as a school. It would be a horrible travesty to see this amazing small stretch of nature that we still have available to us be turned into a smoke pumping, noise polution causing, pesticide infested tourist rail way. I am 100% opposed to having this trail be redesigned to accomodate future train trafic. I urge the city to keep the current trail plan as is and eliminate the proposal to add rail traffic. Thank you for your time.

Kimberly Rodda

 From:
 JAIME GARZA

 Sent:
 Wednesday, June 13, 2018 9:53 AM

 To:
 Tom Buford

 Subject:
 DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Tom,

I support the City's current trail plan and oppose efforts to redesign the trail around future train traffic.

With the recent opening of the Cosumnes exit on Interstate 5 and 2,000 planned homes to the south, traffic will likely increase substantially in the South Land Park area. In fact, we are already feeling the impact.

Adding train traffic is the last thing we need. We want to protect our quality of life in our neighborhood.

Sincerely, Jaime Garza

Sent from my iPhone

From: Sent: To: Subject: Milton Sarlis < Wednesday, June 13, 2018 9:46 AM Tom Buford del rio trail

As a resident, who's property is adjacent to the property in question, do only support the current trail plan. I strongly oppose the proposed rail system. I lived in the area when it was still active and remember being shaken out of bed and a small child.

Please fight this rail system Milton and Rheanon Sarlis

From: Sent: To: Subject: Donald Fingado Wednesday, June 13, 2018 9:10 AM Tom Buford South Land Park Rail Line

I would like to let you know that I am in <u>favor</u> of an <u>active</u> rail line in this corridor. The Del Rio Trail should be redesigned to accommodate future active rail traffic.

Thank you for allowing my input.

Don Fingado

Sent from Mail for Windows 10

From: Sent: To: Subject: Alex Zangeneh Azam < Wednesday, June 13, 2018 8:51 AM Tom Buford SLPA Trail

Hello Tom, i'm very interested in the old abandoned train trail being developed into a walking or biking path. How can I keep myself updated on this matter?

Cheers

Zanac

From: Sent: To: Subject: Caryl Rose Wednesday, June 13, 2018 7:27 AM Tom Buford Del Rio Trail

Dear Mr. Buford:

I wanted to take a moment to introduce myself. My name is Caryl Rose, and I am a resident of S Land Park.

Our family is in opposition of the rail tracks being utilized for tourist train transportation. The train is loud and smelly. Four years ago, the community spoke very loudly against the use of the rails, and we remain in opposition. The trails use by pedestrians, cyclists, runners and others, would be impeded due to safety concerns of having pedestrian traffic next to an active rail. These tracks have been out of use and have not been maintained for several years; the taxpayer has no interest in supporting its re-implementation. Instead, we support a viable, multi-use pedestrian Trail that encourages community health and neighborly participation.

Thank you for your time.

Kind regards, Caryl

From: Sent: To: Subject: Don Dean Tuesday, June 12, 2018 9:18 PM Tom Buford Del Rio Trail Project

Tom, my name is Don Dean, a 40-year homeowner and resident of Sacramento in ZIP Code 95822. My family has considered it a privilege to have lived in the greater Land Park area these many years.

As a registered civil engineer and traffic engineer I've become acquainted with the environmental impact process and welcome this opportunity to offer comments on the proposed rail and walking trail in Del Rio area. Controlled access to the historic urban and rural experiences are important to our community today.

First, by connecting a string of cultural gems in Sacramento, we have a unique opportunity presented by the General Plan.—the opportunity of connecting the railroad museum, the charm of Old Sacramento, the City's new river Promenade, SMUD's Circle of Lights sculpture, the expanded Crocker Art Museum, and, of course, the Sacramento Zoo.

South of Meadowview/Pocket Road we have a treasure in the *Stone Lakes National Wildlife Refuge* that neither the automobile nor hiker is now allowed to freely penetrate. The wildlife refuge basin also occupies a strategic location and serves as an effective barrier to urban encroachment into the Delta. The proposed occasional trips to Hood on existing rail right of way can give all of us a heretofore inaccessible close-up view of the wetlands that support tens of thousands of migratory birds.

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From: Sent: To: Subject:

Tuesday, June 12, 2018 8:51 PM Tom Buford Del Rio Bike/Pedestrian Trail

Dear Mr. Buford,

I'm responding to news that the city is doing an environmental impact study on the use of trains on the tracks where the Del Rio Bike/Pedestrian Trail has been planned. I am opposed to the use of trains on the tracks. Please keep the trains out of this residential area and let its use be for bikes and pedestrians. Thanks for your consideration,

Bev Silva



From: Sent: To: Subject: Greg Beyrer Tuesday, June 12, 2018 8:21 PM Tom Buford Support for the *current* Del Rio Trail Project (K15165100)

Hello,

I am a parent and homeowner whose backyard fence is adjacent to the unused rail line planned for renewal as a walking and bike trail. As you can imagine, I have concerns regarding my children's safety should the project be redesigned yet again to accommodate an operating train. No schedule will be infrequent enough to allay my fears of a preventable accident. In addition, our neighborhood already has enough noise pollution from Sacramento Executive Airport and does not need it worsened by the screech of brakes, whine of engines, or blast from train horns.

As a teacher of history I appreciate how the California State Railroad Museum explores the role that railroads have played in California. But it is far better for the smoke from the excursion rides remain along the current route of the Sacramento Southern Railroad and not billow through the backyards and homes of the residents of South Land Park.

I urge the Del Rio Trail Project to proceed with its current plan.

Sincerely,

Gregory Beyrer

From: Sent: To: Subject: Serene E < Tuesday, June 12, 2018 6:46 PM Tom Buford re:Hiking trail

Hi, I heard that there's been another block on the south land park hiking trail! No! We desperately need that in our community. Don't allow new plans to block this much needed trail!

Serene Erby

From: Sent: To: Subject: Attachments: Dale Parker < Tuesday, June 12, 2018 5:59 PM Tom Buford Topic for Del Rio Trail EIR drpanel.vcf

June 12, 2018

To: Tom Buford - City of Sacramento - Project Manager - Del Rio Trail Project

Reference: Notice of Preparation of an Environmental Impact Report for the Del Rio Trail project

Hello,

When I first heard about the Del Rio Trail and attended a neighborhood meeting I was a project supporter. As of now, after attending more meetings and open houses I am a non-supporter.

The design of the trail includes landscaping and amenities along the entire 4.5 miles. Ongoing maintenance and repair of the landscaping and amenities is expensive. (\$100K to \$300K per year?) Unless I missed a meeting that discussed and provided a solution there is no plan to develop an ongoing funding source, year after year, to fund the maintenance and repair that will be necessary for the Del Rio Trail facility. A typical example of this situation is the Sacramento City River Promenade Part 2 project that included landscaping and amenities from the Circle Of Lights to around R Street. When installed it was beautiful. It did not take long, however, for the lawn and plants to become weed choked. There was no plan set up to provide ongoing funds to maintain the new Promenade. The fencing is broken. Many of the bollards at the paths crossing the railroad tracks were removed and not replaced. (Temporary pipes have been there for several years.) The water spraying sculpture often does not work and leaks. The drinking fountains have problems that are not repaired. These are the types of problems that I believe will happen along the Del Rio Trail unless a permanent and ongoing funding source is set up to pay for the necessary month after month and year after year maintenance and repair.

A topic of funding for ongoing maintenance and repair should be, if not already a part of it, added to the EIR. Unless the necessary and dependable funding system is developed the Del Rio Trail should not be constructed.

Thank you for the opportunity to comment and suggest content for the EIR.

Dale Parker

From: Sent: To: Subject: Sandra Stoner -Tuesday, June 12, 2018 5:55 PM Tom Buford Del Rio Trail

I am happy with the city's plan to make a walking biking trail and dog run at Del Rio. Many people currently use the trail for that purpose. We do not want a train running through there. We appreciate the train options we already have and do not need more. Thanks, Sandra Stoner

Sent from my iPhone

From: Sent: To: Cc: Subject: Kendra Finley Tuesday, June 12, 2018 5:36 PM Tom Buford Neighborhood Association South Land Park Del Rio Trail Project letter of support

I'm writing to support the Del Rio Trail Project and to oppose any redesign that would include the addition of future excursion/tourist train usage along that corridor.

A South Land Park Neighborhood Association (SLPNA) email I received this morning states that early this year the CA State Railroad Museum Foundation wanted the old railroad tracks listed on a historic registry, causing the City's plan for the Trail Project to be redesigned.

The letter goes on to state: "However, in May, the Foundation <u>changed</u> their focus from rail preservation to tourist train activation, asking the City to re-design the trail <u>again</u>, but this time demanding that the trail be designed to accommodate possible future train traffic. As you may recall, the State officially removed the South Land Park tracks from its tourist train plans in 2014 after significant community opposition."

In late 2003, as president of SLPNA, I learned about the plan to develop an excursion train route through Land Park and South Land Park neighborhoods. Our association held a number community meetings over several years and a write-in campaign regarding the prospect of a train running next to homes in our area. There was vociferous opposition in our neighborhood and others along the proposed route, which ultimately led to the 2014 action mentioned above.

It is incredible to me that the Railroad Museum Foundation is coming back so many years after neighborhoods first got wind of this unpopular excursion train plan. Do they get unlimited do-overs? Hopefully not.

I have been enthused about and support the Trail Project now in the works and, again, I oppose any effort to force the inclusion of a future tourist train into the Del Rio project. We need to get people walking and bicycling along the trail sooner, not later!

Kendra Finley South Land Park Hills resident



From: Sent: To: Subject: Rosemary Braxton Tuesday, June 12, 2018 5:31 PM Tom Buford Del Rio Trail Plan

This is to voice my support for the City of Sacramento's current plan for the Del Rio Trail. I oppose the development of a future train or tourist conveyance configuration. We need safe walking and riding paths that are connected throughout the city for community well being including good health.

Rosemary H. Braxton

From: Sent: To: Subject: John/Linda Tuesday, June 12, 2018 4:06 PM Tom Buford Del Rio Trail

The City has changed its mind about the Del Rio Trail. Don't citizens (voters) have a say in what they want in their neighborhood? If tourist trains are allowed, some day, to run within 5' for a child's bed room there may be a horrible accident. The citizens of Land Park and S. Land Park did not want this train and protested it for years! Now that we thought this was settled it is rearing it's UGLY HEAD. Did you think that we forgot all the reasons we did not want this dangerous, noisy, air polluting train going through our residential neighborhoods? Very disappointing! One of many concerned voters.

From: Sent: To: Subject: Kim Beyrer Tuesday, June 12, 2018 4:02 PM Tom Buford Del Rio Trail Plan

Hello,

I am writing to strongly endorse the Del Rio Trail Plan, as written. As a homeowner living, with children, adjacent to the railroad, I have serious concerns about any locomotive running through the neighborhood. To be clear, I oppose any plans to redesign the trail project to facilitate future train traffic. Trails NOT trains!

Thank you for your consideration.

Kimberlee Bevrer

From: Sent: To: Subject: Jennifer Osborn Tuesday, June 12<mark>, 2018 3:43 PM Tom Buford Del Rio trail - support for track removal</mark>

Hello, I would like to state my support for the original plan to remove most of the train tracks along the proposed Del Rio trail, as was initially envisioned when the city designed the trail.

Opening this route to future potential train use would have a detrimental effect on the homeowners along the trail, as well as the wildlife and environmental habitat that has evolved there in the many years since the train tracks have been dormant.

The tourist train that operates out of Old Sacramento spews dirty black polluting smoke into the air on weekends, it can be seen along the river parkway from a significant distance. I am not even sure how that is legal, and I do not believe it would be environmentally friendly to bring that dirty air down into neighborhoods where people live with families and pets.

The tourist train is fine as it currently operates (except for the air pollution) and I do not see any legitimate reason that it would need to be extended ever. California is in the process of building a high speed rail line. That is the future, the Del Rio train tracks are the past.

Sincerely,

Jennifer Osborn

 From:
 Amy Yan

 Sent:
 Tuesday, June 12, 2018 2:04 PM

 To:
 Tom Buford

 Subject:
 DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Dear Tom,

We **strongly support** the City's current Del Rio trail plan, and vehemently **oppose** efforts to re-design the trail around future train traffic.

Dan Wilson and Amy Yan

Sent from my iPhone

From:	noworries847 <
Sent:	Tuesday, June 12, 2018 1:47 PM
То:	Tom Buford
Subject:	DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Tom,

I support the City. It's infuriating that entities that do not reside in the neighborhood and would most likely not support an excursion train coming by within feet of their properties, get a say in what happens to OUR neighborhood.

And where was this group when all the vetting was being done? Why do they get to ignore previously established time lines that everyone else had to adhere to?

Oh wait, this smells of money to me....please oppose any plans for this type of train and retain the excellent rails to trails plan. The plan has already been adjusted to address their initial concern about the historic value of the tracks. No more.

Alexandra Kerstner

Sent from my Verizon, Samsung Galaxy smartphone

 From:
 Elizabeth Maerten

 Sent:
 Tuesday, June 12, 2018 1:39 PM

 To:
 Tom Buford

 Subject:
 DEL RIO TRAIL PROJECT - NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Tom,

I support the City.

I do NOT want the trail to provide for any return to rail traffic.

Thank you,

Elizabeth Maerten

From: Sent: To: Subject: Coral Henning Tuesday, June 12, 2018 1:25 PM Tom Buford Del Rio Trail

Tom,

The Del Rio Trail is a fantastic use of this 4.5 long abandoned section of railroad. There are many benefits for the South Land Park community including: safe routes to school, nature walk, access to community gardens, removal of blighted land, exercise opportunities, etc.

Vintage pollution spewing rail cars is not aligned with the current nature of this neighborhood.

My husband and I are opposed to re-designing the trail project to accommodate train traffic!

Coral Henning and Dywan Williams

From:	catherine warmerdam <
Sent:	Tuesday, June 12, 2018 12:35 PM
То:	Tom Buford
Cc:	South Land Park
Subject:	Del Rio Trail Project

Dear Mr. Buford,

I live with my husband and four children in South Land Park, just a couple of blocks from where the Del Rio Trail project is being proposed. I am writing to express my wholehearted support for the trail project as it is currently designed, and to ask the city not to consider altering the plan to accommodate future rail traffic through the neighborhood.

I believe that the trail project is one that will directly benefit city residents, particularly homeowners like myself who will be able to enjoy the trail amenity on a daily basis. I respect and appreciate the historical role that trains have played in our city, but an excursion train catering to tourists, not local residents, is not the right way to honor that history nor the best use of this neighborhood resource.

The Del Rio Trail is compatible with a higher quality of life for neighborhood residents--it's a place for recreation, contemplation and to experience nature and neighborliness. A rail line would serve no such purpose.

I urge you to reject any plans to accommodate future rail traffic through our neighborhood. The Del Rio Trail project has strong neighborhood support--let's move forward with the plan that's in place and not be distracted by pet projects introduced by interests outside our neighborhood.

Thank you for your consideration.

Sincerely,

Catherine Warmerdam

From:
Sent:
To:
Cc:
Subject:

John Flath Tuesday, June 12, 2018 11:43 AM Tom Buford Sharon Flath SLPNA Del Rio Trail plan

I am a homeowner along the Del Rio Trail Plan that we are in full support of for pedestrian and bicycle use. One of the main goals of getting the Del Rio Trail Plan approved was that it would eliminate any further pursuit on the part of the "Railroad Gang" here in Sacramento from trying to create a tourist train route through our quiet bedroom community. My understanding is that they are currently trying to somehow salvage the rails for future use and in my opinion and that of others in my communities this needs to be stopped.

Nobody wants to ride on a tourist train though the backyards of a neighborhood AND we don't want them to either. Furthermore, we don't want train maintenance vehicles or trains being driven through for maintenance for any reason. Antique trains are a major polluter and nuisance to their immediate neighbors. I am one of those neighbors and stand in staunch opposition the prospect of a tourist train program or program support usage along the Del Rio Train Route.

Thank you Sincerely,

John Flath AIA Principal

Nacht & Lewis

From: Sent: To: Cc: Subject: Scott Yates Tuesday, June 12, 2018 11:33 AM Tom Buford slpna@slpna.org; Grace Yates A safe place for travel and recreation

Dear, Mr. Tom Buford, City Project Manager for the Del Rio Trail;

The Del Rio Trail is a much needed asset for the adjoining and surrounding communities. Just last Friday, June 8, the kindergartners from Sutterville elementary accessed the unofficial trail and walked to the Sacramento Zoo and back. It was the safest pedestrian route. Please remove the barriers and install a proper trail surface as soon as possible.

Selfishly, I have a 6-year-old and 4-year-old and we will use the trail for commuting to school (Sutterville currently) and work (Downtown). Southland Park Drive does not have a protected bike lane for portions and it has cross traffic every block. Freeport Blvd has posted speed limits of 55 mph in portions and is frequently travelled at all times of the day, particularly during the morning and evening commutes.

I respect the trail preservations for what they believe, but in this case they're being selfish and not thinking about the good of the community as a whole. Have you walked portions of the current trail? If you have, you may have noticed the trees and shrubs growing within or along the tracks that are 30+ years old. The preservationists have ignored this asset for generations. It's time to give the space to the community. Please help the next generation of residents have a usable space for safe and enjoyable travel and recreation.

Sincerely,

Scott Yates

From: Sent: To: Subject: Bill McElroy < Tuesday, June 12, 2018 10:16 AM Tom Buford Del Rio Trail

Hello,

We live at **a second second basis** Ve are fervent supporters of the planned Del Rio Trail development; and in the strongest words possible, we oppose any change to the current plan – any and all attempts by train supporters to redesign the trail to facilitate possible future train traffic. The rail tracks run right next to our house, and we are deeply concerned about train vibrations damaging our pool, patio, and home foundation, loss of privacy, thick smoke from the engines (terrible air pollution – Bill is an asthmatic), wheel and engine noise, 110 decibel horn blasts, train collisions with pets and pedestrians, and probably more issues if we think about it.

Sincerely,

William McElroy



From:
Sent:
To:
Subject:

Sharon Flath Tuesday, June 12, 2018 9:48 AM Tom Buford No trains through s land park.

From Sharon Flath at south court in south land park.

My house is on the currently quiet cul du sac directly beside the train track. I have a one story home. A train would go within feet of our bedroom and bathroom window. They would be able to see over the fence forcing us to keep the blinds drawn and never being able to look out or let sunlight in. The disturbing noise and privacy violations, the chaotic disturbance of a train would make life very less Desirable on the residence of our community and severely decreased our property value.

Please please do not allow the trains.

We support whole heartedly the trails that have already been planned for the area where the old tracks are and this would be much more friendly and healthy to the people able to use it and to the neighborhood. Trails would also, of course be extremely budget friendly for all. And cleaner air. An all around better solution for the space

Thank you for your consideration,

Sharon Flath.

Sent from my iPhone

From:	Tom Buford <tbuford@cityofsacramento.org></tbuford@cityofsacramento.org>
Sent:	Tuesday, June 12, 2018 8:39 AM
То:	Keith Umemoto
Cc:	Brian Ebbert; Allison Joe; Daniel C. Weitzman
Subject:	RE: EIT - Trail v Train South Land Park

Thank you for your comments regarding the project.

Tom

Tom Buford, Manager Environmental Planning Services (916) 799-1531

From: Keith Umemoto Sent: Tuesday, June 12, 2018 8:28 AM To: Tom Buford Cc: Brian Ebbert ; Allison Joe ; Daniel C. Weitzman Subject: EIT - Trail v Train South Land Park

Mr. Buford:

As a long time resident of South Land Park, I, without hesitation, support the City's Del Rio Trail Plan as written. This proposal is perfect for the neighborhood that is home to young children, households with pets, walkers, and joggers. For me, I walk daily, sometimes with my dog and other times without, along the proposed trail path.

The trail serves so many purposes for the neighborhood:

- SOCIAL - to get to know others walking or jogging - building stronger bonds with one's family and the neighborhood;

- CRIME PREVENTION - to have residents walk or jog throughout the neighborhood to and from the trail from their home providing foot traffic throughout the day;

- HEALTH - to get exercise, for me to get my steps, as well as the many other neighbors walking or jogging; and - AMBIANCE - to enhance the neighborhood atmosphere.

And, the proposed trail would enhance all of the aforementioned virtues of a wonderful neighborhood.

In contrast, any thoughts of enabling a train to pass through the neighborhood is the exact opposite of the aforementioned ideal traits for a neighborhood. Besides being cost prohibitive as building a tourist train would cost millions of dollars for the few that take it, it is intrusive to have a train within 10 yards of bedroom windows and backyards. Further, a train would produce other environmental hazards, noise, smoke, and vibration (probably damaging property - minimally reducing the life to structures).

With the height of trains, it means these tourist would be able to literally see bedrooms, living rooms, and backyards of those living next to the tracks. For others further from the tracks, it too would be noisy in an otherwise peaceful neighborhood.

I appreciate the opportunity to comments, and strongly support the City's current plan to build the Del Rio Trail Plan.

If you have any questions, please feel free to contact me.

From: Sent: To: Cc: Subject: Keith Umemoto Tuesday, June 12, 2018 8:28 AM Tom Buford Brian Ebbert; Allison Joe; Daniel C. Weitzman EIT - Trail v Train South Land Park

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I appreciate the opportunity to comments, and strongly support the City's current plan to build the Del Rio Trail Plan.

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If you have any questions, please feel free to contact me.

KEITH UMEMOTO

From: Sent: To: Subject: Tom Buford <TBuford@cityofsacramento.org> Tuesday, June 12, 2018 7:04 AM Ronit Rieser RE: Del Rio Trail

Thank you for tyour comment on the project.

Tom

Tom Buford, Manager Environmental Planning Services (916) 799-1531

-----Original Message-----From: Ronit Rieser -----Sent: Monday, June 11, 2018 7:50 PM To: Tom Buford <TBuford@cityofsacramento.org> Subject: Del Rio Trail

Dear Mr Buford,

I am very excited that the city of Sacramento is proceeding with the Dell Rio trail. I have been already using the trail myself for years.

One thing that I would like to see included in the studies of the trail is the preservation and use of natural vegetation in the landscaping. I would also like to see the trail used as a wildlife corridor.

Sincerely, Ronit Rieser

Sent from my iPhone

From: Sent: To: Subject: Ronit Rieser Monday, June 11, 2018 7:50 PM Tom Buford Del Rio Trail

Dear Mr Buford,

I am very excited that the city of Sacramento is proceeding with the Dell Rio trail. I have been already using the trail myself for years.

One thing that I would like to see included in the studies of the trail is the preservation and use of natural vegetation in the landscaping. I would also like to see the trail used as a wildlife corridor.

Sincerely, Ronit Rieser



Sent from my iPhone

From: Sent: To: Subject: Tom Buford <TBuford@cityofsacramento.org> Sunday, June 10, 2018 10:49 AM Jody Wright RE: Del Rio Trail Project

Ms. Wright:

Thank you for your interest in the project, and your comment on the NOP.

Tom

Tom Buford, Manager Environmental Planning Services (916) 799-1531

From: Jody Wright Sent: Sunday, June 10, 2018 10:32 AM To: Tom Buford Subject: Del Rio Trail Project

Dear Mr. Buford,

As a resident of the Pocket area for the past 33 years, I consider the proposed Del Rio Trail to be a tremendous asset to our community. I am concerned, though, about the proposed grade-level road crossings. I'm not sure exactly how many roads will have to be crossed, but certainly there will be crossings at Pocket/Meadowview Road and Florin Road. They are both very busy streets, and crossings there would greatly inhibit traffic. Trail crossings at Florin Road, Gloria Drive, and Riverside Blvd. along Seymour Park in Greenhaven are all bridges that cross those roads. Bridges would also be very necessary crossing roads along the Del Rio Trail as well.

Thank you for your consideration.

Jody Wright

From: Sent: To: Subject: Jody Wright Sunday, June 10, 2018 10:32 AM Tom Buford Del Rio Trail Project

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Thank you for your consideration.

Jody Wright

From: Sent: To: Cc: Subject: Tom Buford <TBuford@cityofsacramento.org> Sunday, June 10, 2018 8:49 AM dave neilsen Amy Storck; Jesse Gothan RE: Del Rio Trail Project

Mr. Neilsen:

Thank you for your comment regarding the Del Rio Trail project. Your comment will be included as a response to the Notice of Prepation.

Tom

Tom Buford, Manager Environmental Planning Services (916) 799-1531

From: dave neilsen Sent: Friday, June 8, 2018 3:27 PM To: Tom Buford Subject: Del Rio Trail Project

Dear Mr. Buford,

YAY. Glad to see more progress on the Del Rio Trail. Much needed, can't wait, a safer corridor for north/south travel....

I live in south land park, next door to an empty house, ha, on of the older citizens that is fighting against the trail. He amazes me, how someone in their 90's who doesn't walk or ride bikes can have such passion for fighting it. We also have friends who love the quiet, natural look, and will miss the dirt and weeds when bikes start rolling through there.

Progress. Many citizens, kids and businesses will enjoy the benefits.

I write only to encourage the City to keep on! We have been here only a year, coming from Roseville, where we daily used the Miner's Ravine multi-use trail. Walking, walking with dogs, and riding our bikes. Used it for 8 years. Saw every single kind of disaster possible - from the confused, uninformed, dazed and drunk, chatty stroller pushing dorks, dogs on no leash, long leashes, going against traffic with traffic, in all lanes.... it was always an adventure. So my advice, plenty of signs, decent speed limit suggestions, trash cans, non-english signs?, no sharp corners ever, and wide shoulders to allow for bail outs when dorks collide... and they will....

Again, can't wait, sad to see it take so long to add what most communities would jump at having without all of the worries and resistance. Best of luck to you and your crew!

dave neilsen

Gary G. Rannefeld

July 5, 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 Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

Here are some items that should be included in the NOP for the pending EIR for the Del Rio Trail initiative:

SACRAMENTO HAS A UNIQUE HISTORICAL CONNECTION TO THIS RAILROAD: I support a design that recognizes the railway's contribution to Sacramento's history. The Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) was in operation from 1909 to 1978. As an excursion railroad, the SSRR has been in operation for over 30 years with over 3 million riders. This historic artifact belongs to all Californians, wherever they live.

A POSITIVE AND IMPORTANT TOURIST ATTRACTION FOR SACRAMENTO: I support the extension of rail operations as a great promoter of our local culture, and as a great generator of sales and tax revenue for the city. Continued rail operation supports an internationally recognized attraction and amenity bringing visitors from around the world.

BIKE/PEDESTRIAN/TRAIN COMBINED USE: I support the combined operation of railroads, bicycles, and pedestrians as it is safe for all. The SSRR railroad has been operated close to pedestrians, bicycles, and auto traffic without incident for over 30 years. This includes operation in Old Town, crossing Capitol Mall at the Tower Bridge, and the parallel bike/pedestrian rail trail from The Promenade and Miller Park south to Baths. In the United States, thousands of miles of mixed rail/trail are safely in operation today.

DO NOT PLACE A TRAIL BETWEEN EXISTING RAILS! This creates a dangerous and possibly fatal precedent. Habits learned walking between rails on the Del Rio can be extremely dangerous if not fatal when walking on an active railway. All railroad safety programs state walking between the rails is dangerous and causes multiple fatalities every year.

NEGATIVE IMPACTS ARE OVERSTATED: I believe that the emotional negative impacts put forward by some groups are overstated and/or just plain wrong. The SSRR is a Class 3 railroad and closely regulated by the Federal Railway Administration.

LIMITED USE OF THE CORRIDOR IS PLANNED FOR THE FUTURE: I support the use of the corridor to position rail equipment between Old Town and the new station in the Pocket Road area. As such, only a few train movements per month are anticipated. Any operation is years in the future.

Respectfully submitted, mfamped

July 4, 2018

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

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I have been a docent at the California State Railroad Museum for over 6 years since retiring from the State Court System in 2012. The primary reason I volunteer is because I believe preserving our rail history is extremely important. Each day I volunteer I drive over 60 miles round trip at my own expense to contribute to this worthy cause.

Every weekend, when I work on the Sacramento Southern Railroad excursion trains from Old Sacramento, I meet hundreds of people from around California and the rest of the world who are extremely impressed with our efforts to share our rich railroad history with visitors to our fair city.

This is why I wanted to share some thoughts with you regarding the Del Rio Environmental Impact Report.

Here are some issues that should be included in the NOP for the pending EIR for the Del Rio Trail initiative:

DO NOT PLACE A TRAIL BETWEEN EXISTING RAILS!

This creates a dangerous and possibly fatal precedent. Habits learned walking between rails on the Del Rio can be extremely dangerous if not fatal when walking on an active railway. All railroad safety programs state walking between the rails is dangerous and causes multiple fatalities every year. When I commuted to work via the Capitol Corridor system over the 12 years prior to my retirement, I personally

experienced numerous fatalities when trespassers on the tracks were struck by the trains on which I was riding.

SUPPORT RAIL CONTRIBUTION FOR SACRAMENTO HISTORY:

I strongly support a design that recognizes the railway's contribution to Sacramento's history. The Sacramento Southern Railroad/Walnut Grove Branch Line (SSRR/WGBL) was in operation from 1909 to 1978. As an excursion railroad, the SSRR has been in operation for over 30 years with over 3 million riders. This historic artifact belongs to all Californians, wherever they live.

BIKE/PEDESTRIAN/TRAIN COMBINED USE: I also support the combined operation of railroads, bicycles, and pedestrians as it is safe for all. The SSRR railroad has been operated close to pedestrians, bicycles, and auto traffic without incident for over 30 years. This includes operation in Old Town, crossing the Tower Bridge, and the parallel bike/pedestrian rail trail from Miller Park south to Bath and Sutterville Road. In the US, thousands of miles of mixed rail/trail are safely in operation today.

A POSITIVE AND IMPORTANT TOURIST ATTRACTION FOR SACRAMENTO: I support the return of rail operations as a great promoter of our local culture, and as a great generator of sales and tax revenue for the city. Rail operations will create an internationally recognized attraction and amenity bringing even more visitors from around the world than at present.

NEGATIVE IMPACTS ARE OVERSTATED: I believe that the emotional negative impacts put forward by some groups are overstated and/or just plain wrong. The SSRR is a Class 3 railroad and closely regulated by the Federal Railway Administration. And as a docent who has volunteered for more than 1,500 hours on the Sac Southern RR, I can attest to the fact that safety is priority number one and reinforced to all crew members at the daily briefings held before each day's operations.

LIMITED USE OF THE CORRIDOR IS PLANNED FOR THE FUTURE: I support the use of the corridor to position rail equipment between Old Town and new station in the Pocket Road area. As such, only a few train movements per month are anticipated. Any operation is years in the future.

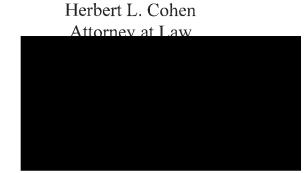
CALIFORNIA STATE RAILROAD MUSEUM FOUNDATION: I support the points made in the Foundation's scoping letter.

Name: Chuck Robuck

Thanks for taking the time to consider these points.

JUN 18 2018

RECEIVED



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

The notice of preparation of an Environmental Impact Report for the Del Rio Trail project, dated June 8, 2018, presents issues of the city's lack of ownership of the property and whether the city has a professional survey of the property. My understanding from discussions with the staff is that it does not.

At this time there can be no assurance that Regional Transit will transfer ownership of the property to the city without consideration for the very substantial value of the property if held for future development. The property was purchased with both state and federal funds and thus doubly imbued with a legal obligation to be used for the financial benefit of Regional Transit. In my previous correspondence I have discussed the opinion of the California Attorney General that a transfer of land from a state agency to a city for less than fair market value violates the California Constitution. It can not be assumed that the Comptroller General would render a contrary opinion as regards a gift of the very substantial imbued federal funds here involved.

A first step for an EIR requires knowledge of the exact location of the property to be acquired. This will reflect on the present and potential development value of the property to be acquired. If the city acquires this five miles of property that the survey shows may be worth millions of development dollars it can not be assumed that it will continue with the Del Rio Trail project. Further, the property runs adjacent to developed property so that during construction the boundaries of the property must be exactly known.

Sincerely

Auber J. This

Page 2 Tom Buford, Community Development Department

cc

Patrick Kennedy, Chair, Sacramento Regional Transit District P.O. Box 2110 Sacramento, CA 95812 Darrell Steinberg, Mayor of Sacramento 915 I Street Sacramento, CA 95814

Tom Buford

From: Sent: To: Subject: Bob Ream Wednesday, July 18, 2018 3:32 PM Tom Buford Del rio Trail

Hi Tom,

I am a volunteer with the Land Park Volunteer Corps and spend a lot of time at the Sutterville Rd. end of the park, plus I am the latest gardener at the cactus garden at the tracks on Sutterville. After reading more, lately, about the Del Rio Trail I sent a letter to a number of people about my views and just received your e mail address.

Basically, I'd like to see the trail not extend north of Sutterville but turn west and travel up through the trees on the existing path and then, near that path's highest point, lead onto a pedestrian/bicycle bridge that would cross over Riverside Blvd. and I 5 to the river trail.

While tending to the cactus garden plants, I have met Rail Museum volunteers are several occasions as they replaced the ties beneath the rails. So I assume the train to the zoo will eventually be a reality. Since the trail north of Sutterville is the most expensive part, Sutterville Rd. is a dangerous road to bike on and the idea is to increase ridership on the trail, I came up with the idea of a bridge.

I have already been told it is too expensive but I like the idea, anyway. Such a bridge, arching north to the river trail would be a beautiful addition to the landscape.

After walking the pathway again yesterday, I am convinced that it should be worked into any future considerations for a bike way on Sutterville. It has a gentle slope through the trees rather than the up and down of the roadway and no competition from cars. From my work with the volunteer corps, I know it is already well used. It is about twice the width of the sidewalk along the zoo area. The width of the zoo sidewalk also needs to be considered in future plans. It would be expensive to widen that sidewalk but there is absolutely no space on the road for a bike path. I don't know how Sutterville Road will ever be safe for cyclists as both sides are dangerous, with blind intersections, fast traffic and commuters trying to get onto the freeway. All this happens while cyclists compete for the right of way. A bridge would solve most of this. Thanks,

Bob

JUN 2 0 2013

17 June 2018

RICENCED

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

Dear Mr. Buford,

As the City of Sacramento prepares an Environmental Impact Report on the proposed Del Rio Trail Project, I'd like to register my thoughts and concerns regarding the trail project.

I live at 1358 Palomar Circle with my wife and two children. We've been living here since 2002. Our house is situated right next to the abandoned rail corridor through which the proposed trail will run. Because of our proximity to this space, we have taken a keen interest in the proposed trail project which, in its current iteration, calls for the construction of bike and pedestrian pathways through a landscape of native (and drought-tolerant) shrubs and trees. Nothing would delight us more than to have the city build this trail. It would provide the people in our community with useful bike and pedestrian paths into the city, and would give us a public space where we could jog, walk our dogs, and leisurely stroll in the company of neighbors. It's a beautiful plan, and we are pleased to know that it enjoys the support of our Councilman, Jay Schenirer, and other elected officials.

We were distressed to learn that someone—it's not clear who—has apparently proposed the idea of restoring the railroad tracks so that trains could once again proceed down this corridor. Running a train through our neighborhood would be a great offense, for it would not only compromise the safety and utility of the bike and pedestrian paths, but also would generate noise and smoke that would disrupt the peace and tranquility of our neighborhood. I know of no one in our neighborhood who wants to bring back the train. It is significant to note that during our 16 years living at Palomar Circle, no one who supports the train has ever come to our door to solicit our opinion on such a project. Supporters of the train apparently know that theirs is an unpopular idea, so they would rather subvert the will of our community for their own selfish ends.

We thank you for your time and consideration.

Sincerely, Calletter Sporold

Carl-Petter Sjovold

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

I am a South Land Park resident and I support the City's plan to design the Del Rio Trail so that it will become an asset for both the local neighborhood and the City of Sacramento at large. Specifically:

- I support as much separated bicycle and pedestrian path as space allows, including using preserved rails as a pedestrian path.
 - I support the Trail corridor becoming an urban greenbelt, including retention and planting of trees and shrubs, and inclusion of amenities such as benches, picnic

Explain What I support a design that recognizes the railway's contribution to Sacramente does recognize involve?history, but not at the expense of a safe path and trail for pedestrians and cyclists. No Train Tradfic I support a design that recognizes the railway's contribution to Sacramento's

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Lagrael.

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Sincerely

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- I oppose maintaining the railroad tracks in a condition designed for train traffic because that will decrease the quality and utility of the Trail and greenbelt for no purpose.
- I oppose the concept of a train through our neighborhood. I don't see why they would want to Taok at the backyards of our neighborhood and ruin our peace. I TOTALLY Support the trail to be a walking and biking trail.

Sincerely,

Name: WENDY NORDSTROM

Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

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Sincerely, Terry & Martha Ford Name: 1

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Sincereij	/s				
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JUL 5 2018

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

RECEIVED

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- COST ALONE IS TOO MUCH FOR SACRAMENTO TO SUSTAIN AND MAINTAIN A TRAIN AND ITS RAIL SYSTEM

Sincerely,

RAIG STORES Name:

COMMUNITY DEVELOPMENT

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

JUL 👡 5 2018

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- I support vetention of the tracks because they are an historic resource. I also support interpretation of the abandoned rail line. Explaining Why the tracks arethere is an opportunity to educate trail users about Sacramento railroad history.

Sincerely,		
Name:	Susan M. Henas	

JUL 5 2018

RECEIVED

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

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Sincerely,

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July 3, 2018

COMMUNITY DEVELOPMENT DEPARTMENT

JUL 5 2018

RECEIVED

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

Re: Proposed Del Rio Trail

Dear Mr. Buford:

I do not agree that trains should be completely banned from the Del Rio Corridor, as these historic tracks have been in place for many decades. The unfortunate truth is that some neighbors purchased houses backing up to the railroad tracks, betting no train would ever pass through. The Del Rio Trail was the means to stop passage of a train altogether.

Frankly, a limited-use scenic train on this historic route is for the greater good, and it has a potential revenue-sharing component to it that the Del Rio Trail does not. I could support a rail/bike/pedestrian corridor plan. It would offer far greater benefit to the public. Currently that is the case now with the Old Sacramento train that goes to the Zoo. Pedestrians, cyclists, joggers and walkers all enjoy the same route, and it works quite well. I continue to have concerns about opening this route, because once the existing gates that currently block the sections south of South Land Park Drive are open, then access will likely cause neighborhood crime to increase.

If there is to be any development, the City should partner with the State of California and Railroad Museum Foundation to build a vibrant multi-use corridor that will be used by many. Afterall, the State does own the key section of right of way there at Sutterville and South Land Park Drive. Without the State's section, the trail would end short of South Land Park Drive.

Sincerely,

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Carol Nelson

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July 3, 2018

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

Re: Proposed Del Rio Trail

Dear Mr. Buford:

While I am in favor of extending the bike and pedestrian trail south of South Land Park Drive, I vigorously oppose any proposal that excludes the use of that corridor by the occasional train. The tracks were used by the Sacramento Southern Railroad until 1978, and they have operated an excursion train over a portion of their tracks for more than 30 years. The uncomfortable fact is that some homeowners bought homes that abutted the tracks in the hope that trains would never use them again, and their opposition to the continued maintenance of the tracks displays the worst aspects of NIMBY-ism, ignoring the public value of a rare urban amenity that occasional excursion trains offer. Removing the tracks would fulfill their desire to forever deny all but a miniscule portion of the public the use of that corridor.

A limited-use scenic train on this historic section has a potential revenue enhancing aspect to it that the biker/walker only Del Rio Trail does not. A rail/bike/pedestrian corridor plan could offer far greater benefits to the public, as the Old Sacramento train that goes to the Zoo currently does. Pedestrians, cyclists, joggers and walkers all enjoy that same route, which works quite well, and the proposed corridor is adequately wide to accommodate bicycles, joggers and an occasional slow-moving train simultaneously and safely.

As you know, the State owns the key section of right of way there at Sutterville and South Land Park Drive. Without the State's section, the trail would end short of South Land Park Drive, and it is therefore incumbent on the City to partner with both the State and the Railroad Museum Foundation to facilitate a solution that will maximize the public benefits of a new trail, as only a cooperative solution can.

Sincerely 10 haud

Richard Begley

JUL 5 2018

JUL ", 5 2018

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

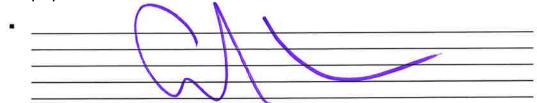
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Re: Del Rio Trail Notice of Preparation (NOP) of an Environmental Impact Report (EIR)

Dear Mr. Buford:

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JUL _ 5 2018

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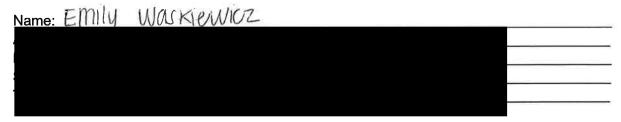
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Name: Angelica Rodnauez

MICHAEL J. CONLAN, ESQ.



COMMUNITY DEVELOPMENT DEPARTMENT

JUL 2 2018

RECEIVED

JUNE 29, 2018

Mr. Tom Buford City of Sacramento Community Developement Dept. 300 Richards Blvd., 3rd Floor Sacramento, Ca. 95811

Dear Mr. Buford,

My wife and I are residents of the South Land Park Terrace neighborhood. As you can see from the above address we live about 50 yards from the intersection of 3 adjoining streets (Normandy Lane, Del Rio Road and 27th Ave.) In 2014 we were advised by some of our neighbors that the California State Railroad Museum Foundation was moving the State Park & Recreation Association to allow an ill- advised excursion train to run from Old Sacramento and use the old abandoned tracks through four miles of the neighborhoods south of Suttervile Road and north of Meadowview Road.

This move by the Railroad Foundation was not done with any transparency or notice to any of the thousands of neighbors other than those homeowners whose houses abutted the tracks.

I was advised of this plan the night before the Foundation was to present their plan for final approval of the Parks & Rec. Dept. Fortunately, then Senator Darrel Steinberg was advised of this and came to the aid of the South Land Park Neighborhood Association which had been informed of the Railroad's plan and which had loudly protested it. Senator Steinberg asked the State to delay the vote and listen to residents' concerns.

I immediately joined the SLPNA protest and attended the subsequent meetings of the Railroad and State Parks. Mr. Brian Ebberts and I drafted a brochure to notify thousands of homeowners in our neighborhoods of the Railroad Foundations secretive plans. I personally hand delivered over a thousand brochures to the homes South of Suttervile Road and East of South Land Park Drive.

As you are probably aware, Normandy Lane is the only road south of Suttervile and North of Fruitridge Road that connects South Land Park Drive and Freeport Blvd. Kids ride their bikes down our road to go to the schools east of Del Rio Road. Dog walkers utilize our street to walk

their dogs on the abandoned rail line that we have now designated the "Del Rio Trail". People who shop at Raleys and the businesses alone Freeport Blvd., utilize Normandy Lane to cross over Del Rio Road.

My research indicates that if the rail line is used for even a maintenance train, it would require Signal Arms with bells, lights, horns and other noise at the location of the 3 connecting streets. This would certainly be a nuisance to the homeowners, bike riders, dog walkers, shoppers, and school children in our quiet, peaceful neighborhood. This would certainly reduce the values of all of the beautiful homes in our community.

I don't need to tell you that use of the rails for even a maintenance train would require the same infrastructure at all of the intersections over which it would run (like Fruitridge Road). My research also indicated that crossing arms at Normandy and Del Rio would cost in excess of a half million dollars.

I am writing to you to inform you and the City Council that I support as much separated bicycle and pedestrian path as space allows, including using preserved rails as a pedestrian path.

I support a design that recognizes the railway's contribution to Sacramento's History, but not at the expense of a safe path and trail for pedestrians and cycllists.

I support the Trail corridor becoming an urban greenbelt, including retention and planting of trees and schrubs, and inclusion of amenities such as benches, picnic tables, and a community garden.

I heartily oppose designing the Trail around the return of train traffic of any kind because the return of trains will cause significant negative impacts that cannot be mitigated, and running trains on this section of tracks was recently rejected by State Parks which would operate the train.

I oppose maintaining the railroad tracks in a condition designed for train traffic of any type because that will decrease the utility of the Trail and greenbelt for no purpose.

Mr. Buford, ask yourself, if you lived where my neighbors and I live, would you welcome any chance of a railroad running 50 yards from your front door? I think not!

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

JUL _ 2 2018

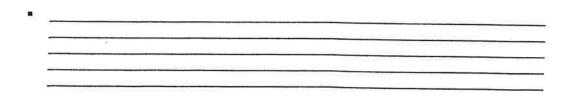
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JUL _ 2 2018

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

JUL _ 2 2018

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Name:

MING HANG CHENG

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Sincerely,	on Jue 27, 20180 Courdians Schenirer Agreed as well.
Name:	CRUBG R. HAWES
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Dale Parker

Date: July 6, 2018

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

Reference: Notice of Preparation of an Environmental Impact Report for the Del Rio Trail project

Hello,

When I first heard about the Del Rio Trail and attended a neighborhood meeting I was a project supporter. As of now, after attending more meetings and open houses I am a non-supporter.

The design of the trail includes landscaping and amenities along the entire 4.5 miles. Ongoing maintenance and repair of the landscaping and amenities is expensive. (\$100K to \$300K per year?) Unless I missed a meeting that discussed and provided a solution there is no plan to develop an ongoing funding source, year after year, to fund the maintenance and repair that will be necessary for the Del Rio Trail facility. A typical example of this situation is the Sacramento City River Promenade Part 2 project that included landscaping and amenities from the Circle Of Lights to around R Street. When installed it was beautiful. It did not take long, however, for the lawn and plants to become weed choked. There was no plan set up to provide ongoing funds to maintain the new Promenade. The fencing is broken. Many of the bollards at the paths crossing the railroad tracks were removed and not replaced. (Temporary pipes have been there for several years.) The water spraying sculpture often does not work and leaks. The drinking fountains have problems that are not repaired. These are the types of problems that will happen along the Del Rio Trail unless a permanent and ongoing funding source is set up to pay for the necessary month after month and year after year maintenance and repair.

A topic of funding for ongoing maintenance and repair should be, if not already a part of it, added to the EIR. Unless the necessary and dependable funding system is developed the Del Rio Trail should not be constructed.

Thank you for the opportunity to comment and suggest content for the EIR.

Dale Parker

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houl TROCKS To tally HADDEN the Above would be the best answer hink total remova Praces with benches & plaques leave Small 10 word train history.

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Sincerely,

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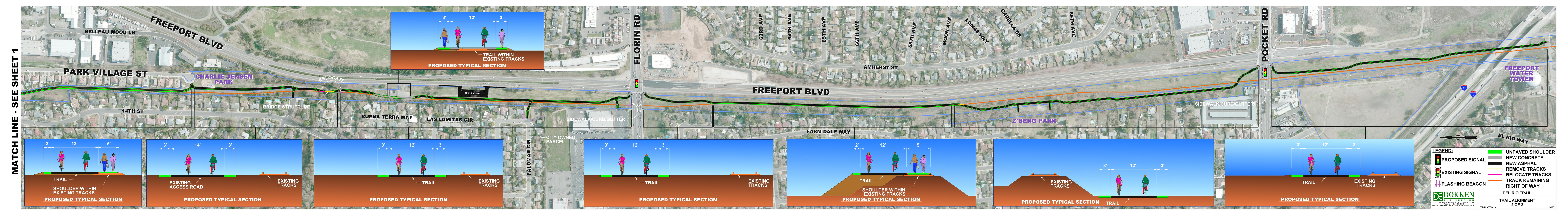
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- I support a design that recognizes the railway's contribution to Sacramento's history, but not at the expense of a safe path and trail for pedestrians and cyclists.
- I oppose designing the Trail around the return of train traffic because the return of trains will cause significant negative impacts that cannot be mitigated, and running trains on this section of tracks was recently rejected by State Parks, which would operate the train..
- I oppose maintaining the railroad tracks in a condition designed for train traffic because that will decrease the quality and utility of the Trail and greenbelt for no purpose.

I also oppose the running of the Trains. from the bathes to sufferentle. I was lam very disappointed that as a nome owner I was not informed. I believed it had been voted down in 2014.
from the bathas to suterville.
I was am very disappointed that as
a nome owner I was not informed. I believed
it had been voted down in 2014.
· Now If does run on Fridays & weekends.
despite the EIR.

Name:	Laurie	Scott		

Appendix D Detailed Project Features Exhibit





Appendix E Road Construction Emissions Model

Road Construction Emissions Model, Version 8.1.0

Daily Emission Estimates for ->	Del Rio Trail			Total	Exhaust	Fugitive Dust	Total	Exhaust	Fugitive Dust					
roject Phases (Pounds)	ROG (lbs/day)	CO (lbs/day)	NOx (lbs/day)	PM10 (lbs/day)	PM10 (lbs/day)	PM10 (lbs/day)	PM2.5 (lbs/day)	PM2.5 (lbs/day)	PM2.5 (lbs/day)	SOx (lbs/day)	CO2 (lbs/day)	CH4 (lbs/day)	N2O (lbs/day)	CO2e (lbs/day
Grubbing/Land Clearing	1.43	10.05	13.31	3.09	0.59	2.50	1.04	0.52	0.52	0.03	2,308.17	0.47	0.03	2,327.56
Grading/Excavation	6.08	48.49	65.30	5.63	3.13	2.50	3.21	2.69	0.52	0.13	13,145.13	2.51	0.23	13,274.85
Drainage/Utilities/Sub-Grade	5.09	41.61	49.30	4.93	2.43	2.50	2.76	2.24	0.52	0.08	7,473.69	1.61	0.07	7,535.22
Paving	2.16	20.55	19.01	1.13	1.13	0.00	1.00	1.00	0.00	0.04	3,457.22	0.78	0.04	3,487.78
Maximum (pounds/day)	6.08	48.49	65.30	5.63	3.13	2.50	3.21	2.69	0.52	0.13	13,145.13	2.51	0.23	13,274.85
Total (tons/construction project)	0.31	2.51	3.14	0.29	0.15	0.14	0.17	0.14	0.03	0.01	569.13	0.11	0.01	574.41
Notes: Project Start Year ->	2020													
Project Length (months) ->	6													
Total Project Area (acres) ->	13													
Maximum Area Disturbed/Day (acres) ->	0													
Water Truck Used? ->	Yes						_							
		nported/Exported (yd ³ /day)		Daily VMT (miles/day)										
Phase	Soil	Asphalt	Soil Hauling	Asphalt Hauling	Worker Commute	Water Truck								
Grubbing/Land Clearing	0	0	0	0	560	40								
Grading/Excavation	672	103	1,020	180	1,080	40								
Drainage/Utilities/Sub-Grade	0	0	0	0	960	40								
Paving	0	0	0	0	800	40								
PM10 and PM2.5 estimates assume 50% control of fugitive dust from wate	ring and associated	dust control measu	res if a minimum nu	mber of water trucks	s are specified.									
Total PM10 emissions shown in column F are the sum of exhaust and fugit	ve dust emissions s	shown in columns G	and H. Total PM2.5	emissions shown in	Column I are the sur	n of exhaust and fu	gitive dust emissions	s shown in columns	J and K.					
CO2e emissions are estimated by multiplying mass emissions for each GH	G by its global warm	ning potential (GWP)	, 1 , 25 and 298 for	CO2, CH4 and N2O), respectively. Total (CO2e is then estimation	ted by summing CO	2e estimates over a	ll GHGs.					

Total Emission Estimates by Phase f	or -> Del Rio Trail			Total	Exhaust	Fugitive Dust	Total	Exhaust	Fugitive Dust					
Project Phases (Tons for all except CO2e. Metric tonnes for CO2e)	ROG (tons/phase)	CO (tons/phase)	NOx (tons/phase)	PM10 (tons/phase)	PM10 (tons/phase)	PM10 (tons/phase)	PM2.5 (tons/phase)	PM2.5 (tons/phase)	PM2.5 (tons/phase)	SOx (tons/phase)	CO2 (tons/phase)	CH4 (tons/phase)	N2O (tons/phase)	CO2e (MT/phase)
Grubbing/Land Clearing	0.01	0.07	0.09	0.02	0.00	0.02	0.01	0.00	0.00	0.00	15.23	0.00	0.00	13.94
Grading/Excavation	0.16	1.28	1.72	0.15	0.08	0.07	0.08	0.07	0.01	0.00	347.03	0.07	0.01	317.93
Drainage/Utilities/Sub-Grade	0.12	0.96	1.14	0.11	0.06	0.06	0.06	0.05	0.01	0.00	172.64	0.04	0.00	157.91
Paving	0.02	0.20	0.19	0.01	0.01	0.00	0.01	0.01	0.00	0.00	34.23	0.01	0.00	31.32
Maximum (tons/phase)	0.16	1.28	1.72	0.15	0.08	0.07	0.08	0.07	0.01	0.00	347.03	0.07	0.01	317.93
Total (tons/construction project)	0.31	2.51	3.14	0.29	0.15	0.14	0.17	0.14	0.03	0.01	569.13	0.11	0.01	521.10
DM40 and DM0 5 activates accurate 500/ accurate of functions during for	an constantin a sea di anno sinte d	dente a sustant as a sur-		and an affirmation to call	and an exit and									

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified.

Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in columns G and H. Total PM2.5 emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K.

CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, 25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs.

The CO2e emissions are reported as metric tons per phase.

Appendix F CNDDB, USFWS, and CNPS Special Status Species Lists

Andrew Dellas

From:	Andrew Dellas
Sent:	Thursday, July 6, 2017 4:49 PM
То:	nmfsswrca.specieslist@noaa.gov
Cc:	Andrew Dellas
Subject:	City of Sacramento / Caltrans District 3 - Del Rio Trail Project

Quad Name Sacramento West Quad Number 38121-E5

ESA Anadromous Fish

SONCC Coho ESU (T) -CCC Coho ESU (E) -CC Chinook Salmon ESU (T) -CVSR Chinook Salmon ESU (T) - X SRWR Chinook Salmon ESU (E) - X NC Steelhead DPS (T) -CCC Steelhead DPS (T) -SCCC Steelhead DPS (T) -SC Steelhead DPS (E) -CCV Steelhead DPS (T) - X Eulachon (T) -SDPS Green Sturgeon (T) - X

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -CCC Coho Critical Habitat -CC Chinook Salmon Critical Habitat -CVSR Chinook Salmon Critical Habitat - X SRWR Chinook Salmon Critical Habitat - X NC Steelhead Critical Habitat -CCC Steelhead Critical Habitat -SCCC Steelhead Critical Habitat -SC Steelhead Critical Habitat -CCV Steelhead Critical Habitat -X Eulachon Critical Habitat -SDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -Olive Ridley Sea Turtle (T/E) -Leatherback Sea Turtle (E) -North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -Fin Whale (E) -Humpback Whale (E) -Southern Resident Killer Whale (E) -North Pacific Right Whale (E) -Sei Whale (E) -Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -

Essential Fish Habitat

Coho EFH -	
Chinook Salmon EFH -	X
Groundfish EFH -	X
Coastal Pelagics EFH -	
Highly Migratory Species EFH -	

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -MMPA Pinnipeds - Quad Name Sacramento East Quad Number 38121-E4

ESA Anadromous Fish

SONCC Coho ESU (T) -CCC Coho ESU (E) -CC Chinook Salmon ESU (T) -CVSR Chinook Salmon ESU (T) - X SRWR Chinook Salmon ESU (E) - X NC Steelhead DPS (T) -CCC Steelhead DPS (T) -SCCC Steelhead DPS (T) -SC Steelhead DPS (E) -CCV Steelhead DPS (T) -SC Steelhead DPS (T) -SDPS Green Sturgeon (T) - X

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -CCC Coho Critical Habitat -CC Chinook Salmon Critical Habitat -CVSR Chinook Salmon Critical Habitat -X SRWR Chinook Salmon Critical Habitat -NC Steelhead Critical Habitat -CCC Steelhead Critical Habitat -SCCC Steelhead Critical Habitat -SC Steelhead Critical Habitat -CCV Steelhead Critical Habitat -X Eulachon Critical Habitat -SDPS Green Sturgeon Critical Habitat -X

ESA Marine Invertebrates

Range Black Abalone (E) -Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -Olive Ridley Sea Turtle (T/E) -Leatherback Sea Turtle (E) -North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -Fin Whale (E) -Humpback Whale (E) -Southern Resident Killer Whale (E) -North Pacific Right Whale (E) -Sei Whale (E) -Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -

Essential Fish Habitat

Coho EFH -	
Chinook Salmon EFH -	X
Groundfish EFH -	X
Coastal Pelagics EFH -	
Highly Migratory Species EFH -	

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -MMPA Pinnipeds -

Quad Name Davis Quad Number 38121-E6

ESA Anadromous Fish

SONCC Coho ESU (T) -CCC Coho ESU (E) -CC Chinook Salmon ESU (T) - CVSR Chinook Salmon ESU (T) - X SRWR Chinook Salmon ESU (E) - X NC Steelhead DPS (T) -CCC Steelhead DPS (T) -SCCC Steelhead DPS (T) -SC Steelhead DPS (E) -CCV Steelhead DPS (T) - X Eulachon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -CCC Coho Critical Habitat -CC Chinook Salmon Critical Habitat -CVSR Chinook Salmon Critical Habitat -SRWR Chinook Salmon Critical Habitat -NC Steelhead Critical Habitat -CCC Steelhead Critical Habitat -SCCC Steelhead Critical Habitat -SC Steelhead Critical Habitat -CCV Steelhead Critical Habitat -Eulachon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -Olive Ridley Sea Turtle (T/E) -Leatherback Sea Turtle (E) -North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -Fin Whale (E) -Humpback Whale (E) -Southern Resident Killer Whale (E) -North Pacific Right Whale (E) -Sei Whale (E) -Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -

Essential Fish Habitat

Coho EFH -Chinook Salmon EFH -Groundfish EFH -Coastal Pelagics EFH -Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -MMPA Pinnipeds -

Quad Name Saxon Quad Number 38121-D6

ESA Anadromous Fish

SONCC Coho ESU (T) -CCC Coho ESU (E) -CC Chinook Salmon ESU (T) -CVSR Chinook Salmon ESU (T) -X SRWR Chinook Salmon ESU (E) -X NC Steelhead DPS (T) -CCC Steelhead DPS (T) -SCCC Steelhead DPS (T) -SC Steelhead DPS (E) - Eulachon (T) sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

X

SONCC Coho Critical Habitat -CCC Coho Critical Habitat -CC Chinook Salmon Critical Habitat -CVSR Chinook Salmon Critical Habitat -X SRWR Chinook Salmon Critical Habitat -NC Steelhead Critical Habitat -CCC Steelhead Critical Habitat -SCCC Steelhead Critical Habitat -SC Steelhead Critical Habitat -CCV Steelhead Critical Habitat -X Eulachon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -Olive Ridley Sea Turtle (T/E) -Leatherback Sea Turtle (E) -North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -Fin Whale (E) -Humpback Whale (E) -Southern Resident Killer Whale (E) -North Pacific Right Whale (E) -Sei Whale (E) -Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -

Essential Fish Habitat

Coho EFH -Chinook Salmon EFH -Groundfish EFH -Coastal Pelagics EFH -Highly Migratory Species EFH -

X X

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -MMPA Pinnipeds -

Quad Name **Clarksburg** Quad Number **38121-D5**

ESA Anadromous Fish

SONCC Coho ESU (T) -CCC Coho ESU (E) -CC Chinook Salmon ESU (T) -CVSR Chinook Salmon ESU (T) - X SRWR Chinook Salmon ESU (E) - X NC Steelhead DPS (T) -CCC Steelhead DPS (T) -SCCC Steelhead DPS (T) -SC Steelhead DPS (E) -CCV Steelhead DPS (T) -X Eulachon (T) sDPS Green Sturgeon (T) -X

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -CCC Coho Critical Habitat -CC Chinook Salmon Critical Habitat - CVSR Chinook Salmon Critical Habitat - X SRWR Chinook Salmon Critical Habitat - X NC Steelhead Critical Habitat -CCC Steelhead Critical Habitat -SCCC Steelhead Critical Habitat -SC Steelhead Critical Habitat -CCV Steelhead Critical Habitat - X Eulachon Critical Habitat - X

ESA Marine Invertebrates

Range Black Abalone (E) -Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -Olive Ridley Sea Turtle (T/E) -Leatherback Sea Turtle (E) -North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -Fin Whale (E) -Humpback Whale (E) -Southern Resident Killer Whale (E) -North Pacific Right Whale (E) -Sei Whale (E) -Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -

Essential Fish Habitat

Coho EFH -Chinook Salmon EFH -



Groundfish EFH - X Coastal Pelagics EFH -Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds

See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -MMPA Pinnipeds -

Quad Name Florin Quad Number 38121-D4

ESA Anadromous Fish

SONCC Coho ESU (T) -CCC Coho ESU (E) -CC Chinook Salmon ESU (T) -CVSR Chinook Salmon ESU (T) -X SRWR Chinook Salmon ESU (E) -X NC Steelhead DPS (T) -CCC Steelhead DPS (T) -SCCC Steelhead DPS (T) -SC Steelhead DPS (E) -CCV Steelhead DPS (T) -X Eulachon (T) sDPS Green Sturgeon (T) -

ESA Anadromous Fish Critical Habitat

SONCC Coho Critical Habitat -CCC Coho Critical Habitat -CC Chinook Salmon Critical Habitat -CVSR Chinook Salmon Critical Habitat -SRWR Chinook Salmon Critical Habitat -NC Steelhead Critical Habitat -CCC Steelhead Critical Habitat -SCCC Steelhead Critical Habitat -SC Steelhead Critical Habitat -CCV Steelhead Critical Habitat - Eulachon Critical Habitat sDPS Green Sturgeon Critical Habitat -

ESA Marine Invertebrates

Range Black Abalone (E) -Range White Abalone (E) -

ESA Marine Invertebrates Critical Habitat

Black Abalone Critical Habitat -

ESA Sea Turtles

East Pacific Green Sea Turtle (T) -Olive Ridley Sea Turtle (T/E) -Leatherback Sea Turtle (E) -North Pacific Loggerhead Sea Turtle (E) -

ESA Whales

Blue Whale (E) -Fin Whale (E) -Humpback Whale (E) -Southern Resident Killer Whale (E) -North Pacific Right Whale (E) -Sei Whale (E) -Sperm Whale (E) -

ESA Pinnipeds

Guadalupe Fur Seal (T) -

Essential Fish Habitat

Coho EFH -Chinook Salmon EFH -Groundfish EFH -Coastal Pelagics EFH -Highly Migratory Species EFH -

MMPA Species (See list at left)

ESA and MMPA Cetaceans/Pinnipeds See list at left and consult the NMFS Long Beach office 562-980-4000

MMPA Cetaceans -MMPA Pinnipeds -

City of Sacramento: 915 | Street, Room 2000; Sacramento, CA 95814 Caltrans District 3: 703 B Street; Marysville, CA 95901

Andrew Dellas, M.S. Environmental Planner / Biologist Dokken Engineering | www.dokkenengineering.com 110 Blue Ravine Rd., #200 Folsom, CA 95630 |(P) 916.858.0642



United States Department of the Interior

FISH AND WILDLIFE SERVICE Sacramento Fish And Wildlife Office Federal Building 2800 Cottage Way, Room W-2605 Sacramento, CA 95825-1846 Phone: (916) 414-6600 Fax: (916) 414-6713



In Reply Refer To: Consultation Code: 08ESMF00-2017-SLI-2042 Event Code: 08ESMF00-2017-E-05227 Project Name: Del Rio Bike Trail Project May 11, 2017

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, under the jurisdiction of the U.S. Fish and Wildlife Service (Service) that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

Please follow the link below to see if your proposed project has the potential to affect other species or their habitats under the jurisdiction of the National Marine Fisheries Service:

http://www.nwr.noaa.gov/protected_species/species_list/species_lists.html

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to

utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan

(http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Sacramento Fish And Wildlife Office

Federal Building 2800 Cottage Way, Room W-2605 Sacramento, CA 95825-1846 (916) 414-6600

This project's location is within the jurisdiction of multiple offices. Expect additional species list documents from the following office:

San Francisco Bay-delta Fish And Wildlife

650 Capitol Mall Suite 8-300 Sacramento, CA 95814 (916) 930-5603

Project Summary

Consultation Code:	08ESMF00-2017-SLI-2042
Event Code:	08ESMF00-2017-E-05227
Project Name:	Del Rio Bike Trail Project
Project Type:	TRANSPORTATION
Project Description:	The City of Sacramento proposes to construct 4.5 miles of Class 1 multi-use trail along the inactive railway corridor near Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/38.51051153320378N121.50650356086706W



Counties: Sacramento, CA

Endangered Species Act Species

There is a total of 11 threatened, endangered, or candidate species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area. Please contact the designated FWS office if you have questions.

Birds

NAME	STATUS
Least Bell's Vireo (Vireo bellii pusillus) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/5945</u>	Endangered
 Yellow-billed Cuckoo (Coccyzus americanus) Population: Western U.S. DPS There is a proposed critical habitat for this species. Your location is outside the proposed critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/3911</u> 	Threatened
Pontilos	

Reptiles

NAME	STATUS
Giant Garter Snake (<i>Thamnophis gigas</i>)	Threatened
No critical habitat has been designated for this species. Species profile: <u>https://ecos.fws.gov/ecp/species/4482</u>	

Amphibians

NAME	STATUS
California Red-legged Frog (<i>Rana draytonii</i>) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/2891</u>	Threatened
California Tiger Salamander (<i>Ambystoma californiense</i>) Population: U.S.A. (Central CA DPS) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/2076</u>	Threatened

Fishes

NAME	STATUS
Delta Smelt (<i>Hypomesus transpacificus</i>) There is a final <u>critical habitat</u> designated for this species. Your location overlaps the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/321</u>	Threatened
Steelhead (Oncorhynchus (=Salmo) mykiss) Population: Northern California DPS There is a final critical habitat designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/1007</u>	Threatened
Insects	
NAME	STATUS
 Valley Elderberry Longhorn Beetle (<i>Desmocerus californicus dimorphus</i>) There is a final critical habitat designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/7850</u> 	Threatened
Crustaceans	
NAME	STATUS
Conservancy Fairy Shrimp (<i>Branchinecta conservatio</i>) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/8246</u>	Endangered
Vernal Pool Fairy Shrimp (<i>Branchinecta lynchi</i>) There is a final <u>critical habitat</u> designated for this species. Your location is outside the	Threatened

designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/498</u>

 Vernal Pool Tadpole Shrimp (Lepidurus packardi)
 Endangered

 There is a final critical habitat designated for this species. Your location is outside the designated critical habitat.
 Endangered

 Species profile: https://ecos.fws.gov/ecp/species/2246

5

Critical habitats

There is 1 critical habitat wholly or partially within your project area.

NAME

STATUS

Delta Smelt (Hypomesus transpacificus)

Final designated



United States Department of the Interior

FISH AND WILDLIFE SERVICE San Francisco Bay-delta Fish And Wildlife 650 Capitol Mall Suite 8-300 Sacramento, CA 95814 Phone: (916) 930-5603 Fax: (916) 930-5654 http://kim_squires@fws.gov



May 11, 2017

In Reply Refer To: Consultation Code: 08FBDT00-2017-SLI-0183 Event Code: 08FBDT00-2017-E-00318 Project Name: Del Rio Bike Trail Project

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 et seq.).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 et seq.), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having

similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan

(http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

San Francisco Bay-delta Fish And Wildlife

650 Capitol Mall Suite 8-300 Sacramento, CA 95814 (916) 930-5603

This project's location is within the jurisdiction of multiple offices. Expect additional species list documents from the following office:

Sacramento Fish And Wildlife Office

Federal Building 2800 Cottage Way, Room W-2605 Sacramento, CA 95825-1846 (916) 414-6600

Project Summary

Consultation Code:	08FBDT00-2017-SLI-0183
Event Code:	08FBDT00-2017-E-00318
Project Name:	Del Rio Bike Trail Project
Project Type:	TRANSPORTATION
Project Description:	The City of Sacramento proposes to construct 4.5 miles of Class 1 multi-use trail along the inactive railway corridor near Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/38.51051153320378N121.50650356086706W



Counties: Sacramento, CA

Endangered Species Act Species

There is a total of 11 threatened, endangered, or candidate species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area. Please contact the designated FWS office if you have questions.

Birds

NAME	STATUS
Least Bell's Vireo (Vireo bellii pusillus) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/5945</u>	Endangered
Yellow-billed Cuckoo (Coccyzus americanus) Population: Western U.S. DPS There is a proposed critical habitat for this species. Your location is outside the proposed critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/3911</u>	
Reptiles	

Reptiles

NAME	STATUS
Giant Garter Snake (<i>Thamnophis gigas</i>) No critical habitat has been designated for this species.	Threatened
Species profile: <u>https://ecos.fws.gov/ecp/species/4482</u>	

Amphibians

NAME	STATUS
California Red-legged Frog (<i>Rana draytonii</i>) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/2891</u>	Threatened
California Tiger Salamander (<i>Ambystoma californiense</i>) Population: U.S.A. (Central CA DPS) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/2076</u>	Threatened

Fishes

NAME	STATUS
Delta Smelt (<i>Hypomesus transpacificus</i>) There is a final <u>critical habitat</u> designated for this species. Your location overlaps the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/321</u>	Threatened
Steelhead (Oncorhynchus (=Salmo) mykiss) Population: Northern California DPS There is a final critical habitat designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/1007</u>	Threatened
Insects	
NAME	STATUS
Valley Elderberry Longhorn Beetle (<i>Desmocerus californicus dimorphus</i>) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/7850</u>	Threatened
Crustaceans	
NAME	STATUS
Conservancy Fairy Shrimp (<i>Branchinecta conservatio</i>) There is a final <u>critical habitat</u> designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/8246</u>	Endangered
 Vernal Pool Fairy Shrimp (<i>Branchinecta lynchi</i>) There is a final critical habitat designated for this species. Your location is outside the designated critical habitat. Species profile: <u>https://ecos.fws.gov/ecp/species/498</u> 	Threatened

 Vernal Pool Tadpole Shrimp (Lepidurus packardi)
 Endangered

 There is a final critical habitat designated for this species. Your location is outside the designated critical habitat.
 Endangered

 Species profile: https://ecos.fws.gov/ecp/species/2246

5

Critical habitats

There is 1 critical habitat wholly or partially within your project area.

NAME

STATUS

Delta Smelt (Hypomesus transpacificus)

Final designated





Query Criteria:

Quad IS (Sacramento West (3812155) OR Sacramento East (3812154) OR Davis (3812156) OR Davis (3812166) OR Sacramento East (3812156) OR Davis (3812156) OR Sacramento East (3812156) OR Davis (3812156) OR Davis (3812156) OR Davis (3812166) OR Davis (3812166) OR Davis (3812146) OR Davis (3812145))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Accipiter cooperii	ABNKC12040	None	None	G5	S4	WL
Cooper's hawk						
Agelaius tricolor	ABPBXB0020	None	Candidate	G2G3	S1S2	SSC
tricolored blackbird			Endangered			
Ammodramus savannarum	ABPBXA0020	None	None	G5	S3	SSC
grasshopper sparrow						
Antrozous pallidus	AMACC10010	None	None	G5	S3	SSC
pallid bat						
Archoplites interruptus	AFCQB07010	None	None	G2G3	S1	SSC
Sacramento perch						
Ardea alba	ABNGA04040	None	None	G5	S4	
great egret						
Ardea herodias	ABNGA04010	None	None	G5	S4	
great blue heron						
Astragalus tener var. ferrisiae	PDFAB0F8R3	None	None	G2T1	S1	1B.1
Ferris' milk-vetch						
Astragalus tener var. tener	PDFAB0F8R1	None	None	G2T2	S2	1B.2
alkali milk-vetch						
Athene cunicularia	ABNSB10010	None	None	G4	S3	SSC
burrowing owl						
Atriplex cordulata var. cordulata	PDCHE040B0	None	None	G3T2	S2	1B.2
heartscale						
Atriplex depressa	PDCHE042L0	None	None	G2	S2	1B.2
brittlescale						
Bombus crotchii	IIHYM24480	None	None	G3G4	S1S2	
Crotch bumble bee						
Bombus occidentalis	IIHYM24250	None	None	G2G3	S1	
western bumble bee						
Branchinecta conservatio	ICBRA03010	Endangered	None	G2	S2	
Conservancy fairy shrimp						
Branchinecta lynchi	ICBRA03030	Threatened	None	G3	S3	
vernal pool fairy shrimp						
Branchinecta mesovallensis	ICBRA03150	None	None	G2	S2S3	
midvalley fairy shrimp						
Buteo regalis	ABNKC19120	None	None	G4	S3S4	WL
ferruginous hawk			-	0-		
Buteo swainsoni	ABNKC19070	None	Threatened	G5	S3	
Swainson's hawk						



Selected Elements by Scientific Name California Department of Fish and Wildlife California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Carex comosa	PMCYP032Y0	None	None	G5	S2	2B.1
bristly sedge						
Charadrius alexandrinus nivosus	ABNNB03031	Threatened	None	G3T3	S2S3	SSC
western snowy plover						
Cicindela hirticollis abrupta	IICOL02106	None	None	G5TH	SH	
Sacramento Valley tiger beetle						
Coccyzus americanus occidentalis	ABNRB02022	Threatened	Endangered	G5T2T3	S1	
western yellow-billed cuckoo						
Cuscuta obtusiflora var. glandulosa	PDCUS01111	None	None	G5T4T5	SH	2B.2
Peruvian dodder						
Desmocerus californicus dimorphus	IICOL48011	Threatened	None	G3T2	S2	
valley elderberry longhorn beetle						
Downingia pusilla	PDCAM060C0	None	None	GU	S2	2B.2
dwarf downingia						
Elanus leucurus	ABNKC06010	None	None	G5	S3S4	FP
white-tailed kite						
Elderberry Savanna	CTT63440CA	None	None	G2	S2.1	
Elderberry Savanna						
Emys marmorata	ARAAD02030	None	None	G3G4	S3	SSC
western pond turtle						
Eryngium jepsonii	PDAPI0Z130	None	None	G2	S2	1B.2
Jepson's coyote-thistle						
Extriplex joaquinana	PDCHE041F3	None	None	G2	S2	1B.2
San Joaquin spearscale						
Falco columbarius	ABNKD06030	None	None	G5	S3S4	WL
merlin						
Great Valley Cottonwood Riparian Forest	CTT61410CA	None	None	G2	S2.1	
Great Valley Cottonwood Riparian Forest						
Hibiscus lasiocarpos var. occidentalis woolly rose-mallow	PDMAL0H0R3	None	None	G5T3	S3	1B.2
Juglans hindsii	PDJUG02040	None	None	G1	S1	1B.1
Northern California black walnut						
Lasionycteris noctivagans	AMACC02010	None	None	G5	S3S4	
silver-haired bat						
Lasiurus cinereus	AMACC05030	None	None	G5	S4	
hoary bat						
Legenere limosa	PDCAM0C010	None	None	G2	S2	1B.1
legenere						
Lepidium latipes var. heckardii	PDBRA1M0K1	None	None	G4T1	S1	1B.2
Heckard's pepper-grass						
Lepidurus packardi vernal pool tadpole shrimp	ICBRA10010	Endangered	None	G4	S3S4	



Selected Elements by Scientific Name California Department of Fish and Wildlife California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Lilaeopsis masonii	PDAPI19030	None	Rare	G2	S2	1B.1
Mason's lilaeopsis						
Linderiella occidentalis	ICBRA06010	None	None	G2G3	S2S3	
California linderiella						
Melospiza melodia	ABPBXA3010	None	None	G5	S3?	SSC
song sparrow ("Modesto" population)						
Myrmosula pacifica	IIHYM15010	None	None	GH	SH	
Antioch multilid wasp						
Navarretia leucocephala ssp. bakeri	PDPLM0C0E1	None	None	G4T2	S2	1B.1
Baker's navarretia						
Neostapfia colusana	PMPOA4C010	Threatened	Endangered	G1	S1	1B.1
Colusa grass						
Northern Hardpan Vernal Pool	CTT44110CA	None	None	G3	S3.1	
Northern Hardpan Vernal Pool						
Nycticorax nycticorax	ABNGA11010	None	None	G5	S4	
black-crowned night heron						
Oncorhynchus mykiss irideus	AFCHA0209K	Threatened	None	G5T2Q	S2	
steelhead - Central Valley DPS						
Oncorhynchus tshawytscha	AFCHA0205A	Threatened	Threatened	G5	S1	
chinook salmon - Central Valley spring-run ESU						
Oncorhynchus tshawytscha	AFCHA0205B	Endangered	Endangered	G5	S1	
chinook salmon - Sacramento River winter-run ESU						
Phalacrocorax auritus	ABNFD01020	None	None	G5	S4	WL
double-crested cormorant						
Plagiobothrys hystriculus	PDBOR0V0H0	None	None	G2	S2	1B.1
bearded popcornflower						
Pogonichthys macrolepidotus	AFCJB34020	None	None	GNR	S3	SSC
Sacramento splittail						
Progne subis	ABPAU01010	None	None	G5	S3	SSC
purple martin				_	_	_
Puccinellia simplex	PMPOA53110	None	None	G3	S2	1B.2
California alkali grass						
Riparia riparia	ABPAU08010	None	Threatened	G5	S2	
bank swallow	DUALISISS			00	0.0	10.0
Sagittaria sanfordii	PMALI040Q0	None	None	G3	S3	1B.2
Sanford's arrowhead			-	05	<i></i>	
Spirinchus thaleichthys	AFCHB03010	Candidate	Threatened	G5	S1	SSC
longfin smelt		Ness	Nex	00	00	10.0
Symphyotrichum lentum	PDASTE8470	None	None	G2	S2	1B.2
Suisun Marsh aster				05	0.0	
Taxidea taxus	AMAJF04010	None	None	G5	S3	SSC
American badger						



Selected Elements by Scientific Name California Department of Fish and Wildlife

California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
Thamnophis gigas	ARADB36150	Threatened	Threatened	G2	S2	
giant gartersnake						
Trifolium hydrophilum	PDFAB400R5	None	None	G2	S2	1B.2
saline clover						
Tuctoria mucronata	PMPOA6N020	Endangered	Endangered	G1	S1	1B.1
Crampton's tuctoria or Solano grass						
Vireo bellii pusillus	ABPBW01114	Endangered	Endangered	G5T2	S2	
least Bell's vireo						
Xanthocephalus xanthocephalus	ABPBXB3010	None	None	G5	S3	SSC
yellow-headed blackbird						

Record Count: 66



Plant List

Inventory of Rare and Endangered Plants

24 matches found. Click on scientific name for details

Search Criteria

State Rank is one of [S1, S2, S3], Found in Quads 3812155, 3812154, 3812144, 3812145 3812156 and 3812146;

Q Modify Search Criteria Second to Excel Modify Columns Modify Sort Display Photos Modify Sort Modify So

Scientific Name	Common Name	Family	Lifeform	Blooming Period	CA Rare Plant Rank		Global Rank
<u>Astragalus tener var.</u> <u>ferrisiae</u>	Ferris' milk-vetch	Fabaceae	annual herb	Apr-May	1B.1	S1	G2T1
<u>Astragalus tener var.</u> <u>tener</u>	alkali milk-vetch	Fabaceae	annual herb	Mar-Jun	1B.2	S2	G2T2
<u>Atriplex cordulata var.</u> <u>cordulata</u>	heartscale	Chenopodiaceae	annual herb	Apr-Oct	1B.2	S2	G3T2
<u>Atriplex depressa</u>	brittlescale	Chenopodiaceae	annual herb	Apr-Oct	1B.2	S2	G2
Carex comosa	bristly sedge	Cyperaceae	perennial rhizomatous herb	May-Sep	2B.1	S2	G5
<u>Centromadia parryi ssp.</u> <u>rudis</u>	Parry's rough tarplant	Asteraceae	annual herb	May-Oct	4.2	S3	G3T3
<u>Downingia pusilla</u>	dwarf downingia	Campanulaceae	annual herb	Mar-May	2B.2	S2	GU
<u>Eryngium jepsonii</u>	Jepson's coyote thistle	Apiaceae	perennial herb	Apr-Aug	1B.2	S2?	G2?
<u>Extriplex joaquinana</u>	San Joaquin spearscale	Chenopodiaceae	annual herb	Apr-Oct	1B.2	S2	G2
Hesperevax caulescens	hogwallow starfish	Asteraceae	annual herb	Mar-Jun	4.2	S3	G3
<u>Hibiscus lasiocarpos</u> <u>var. occidentalis</u>	woolly rose-mallow	Malvaceae	perennial rhizomatous herb (emergent)	Jun-Sep	1B.2	S3	G5T3
<u>Juglans hindsii</u>	Northern California black walnut	Juglandaceae	perennial deciduous tree	Apr-May	1B.1	S1	G1
<u>Legenere limosa</u>	legenere	Campanulaceae	annual herb	Apr-Jun	1B.1	S2	G2
<u>Lepidium latipes var.</u> <u>heckardii</u>	Heckard's pepper- grass	Brassicaceae	annual herb	Mar-May	1B.2	S1	G4T1
<u>Lilaeopsis masonii</u>	Mason's lilaeopsis	Apiaceae	perennial rhizomatous herb	Apr-Nov	1B.1	S2	G2
<u>Myosurus minimus ssp.</u> <u>apus</u>	little mousetail	Ranunculaceae	annual herb	Mar-Jun	3.1	S2	G5T2Q
<u>Navarretia leucocephala</u> <u>ssp. bakeri</u>	Baker's navarretia	Polemoniaceae	annual herb	Apr-Jul	1B.1	S2	G4T2
<u>Neostapfia colusana</u>	Colusa grass	Poaceae	annual herb	May-Aug	1B.1	S1	G1
<u>Plagiobothrys</u> <u>hystriculus</u>	bearded popcornflower	Boraginaceae	annual herb	Apr-May	1B.1	S2	G2
Puccinellia simplex	California alkali grass	Poaceae	annual herb	Mar-May	1B.2	S2	G3

7/6/2017	CNPS Inventory Results						
<u>Sagittaria sanfordii</u>	Sanford's arrowhead	Alismataceae	perennial rhizomatous herb (emergent)	May- Oct(Nov)	1B.2	S3	G3
Symphyotrichum lentum	Suisun Marsh aster	Asteraceae	perennial rhizomatous herb	(Apr)May- Nov	1B.2	S2	G2
<u>Trifolium hydrophilum</u>	saline clover	Fabaceae	annual herb	Apr-Jun	1B.2	S2	G2
<u>Tuctoria mucronata</u>	Crampton's tuctoria or Solano grass	Poaceae	annual herb	Apr-Aug	1B.1	S1	G1

Suggested Citation

California Native Plant Society, Rare Plant Program. 2017. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website http://www.rareplants.cnps.org [accessed 06 July 2017].

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Native American Consultation Log Del Rio Trail Project Sacramento County, California

Affiliation	Name	Contact Date	Contact Type	Response
		7/3/2017	Letter	UAIC received the AB52 letter
		7/11/2017	Letter	A response was emailed from Cherilyn Neider requested consutlation and to join the pedestrian inspection.
		7/12/2017	email	the UAIC was invited to join Dokken engineering during the cultural resources survey of the project area.
	Gene Whitehouse, Chairperson (cont)	7/19/2017	field meeting	In a meeting with Cherilyn Neider and Mathew Rippy from the United Auburn Indian Community of the Auburn Rancheria (UAIC), they stated that there were isolated stones that may be Native American artifacts and they are requesting montoring in areas of ground disturbance.
		7/26/2017	email	A copy of the survey/meeting minutes was emailed to the UAIC, and requested that a confidentiality form to be filled out by the UAIC to receive information from the NCIC. UAIC representative, Mathew Rippy, responded the next day with a series of requested mitigation measures and photos of the possible isolates observed during the survey.
		9/7/2017	email	Cherilyn Neider emailed with mitigation measures recommended for the project, asking that the measures be included in the document and a copy of the cultural study be sent to the UAIC as soon as it is finalized.
United Auburn Indian Community of the Auburn Rancheria	Gene Whitehouse, Chairperson	9/11/2017	email	Cherilyn confirmed with Dana Mahaffey at the City that once the mitigation measures were included in the enviornmental document, the UAIC would consider AB52 for the project complete.
Auburn Hunchenu	charperson			
			Letter	AB52 letter sent to the Wilton by City of Sacramento.
Wilton Rancheria	Raymond Hitchcock, Chairperson	7/6/2017	letter	An email was received from Dana Maheffey that the Wiliton Rancheria is requesting formal consultation and requested copies of the cultural reports.
Wilton Rancheria (cont)	Raymond Hitchcock, Chairperson (cont)			

From:	Machado, Lisa@DOT
To:	Amy Storck
Cc:	<u>Jesse Gothan; William Shunk; Namat Hosseinion; Pamela DalcinWalling; Tom Buford; Carroll, Chris S@DOT; St</u> John, Gail@DOT
Subject:	FW: ATPL 5002 (189) Del Rio Trail
Date:	Monday, October 22, 2018 3:50:05 PM

Hello again,

Good news! Please see below for CSO approval of the NAE-SC-SOIS finding. Please let us know if you have any questions.

Thank you,

Lisa Machado, M.A.

Associate Environmental Planner (Archaeology) California Department of Transportation, District 3 703 B Street, Marysville, CA 95901 (530) 741-4450 Fax: (530) 741-4457

From: Price, David@DOT
Sent: Monday, October 22, 2018 3:14 PM
To: Machado, Lisa@DOT <Lisa.Machado@dot.ca.gov>
Subject: RE: ATPL 5002 (189) Del Rio Trail

Hi Lisa,

I don't know why, but we did not receive this report until the 12th. However, CSO has just finished its review of the HPSR and attached documentation. In accordance with Stipulation X.B.1.b, **CSO has no objection to the Finding of No Adverse Effect with Standard Conditions- SOIS** for the Del Rio Trail Project. Please retain a copy of this email for your files.

Thanks,

David Price

Acting Section 106 Coordinator Cultural Studies Office Caltrans Division of Environmental Analysis 1120 N Street, MS 27, Sacramento, CA 95814 (916) 653-0516

From: Machado, Lisa@DOT
Sent: Monday, October 22, 2018 3:04 PM
To: Price, David@DOT <<u>David.Price@dot.ca.gov</u>>

Subject: ATPL 5002 (189) Del Rio Trail

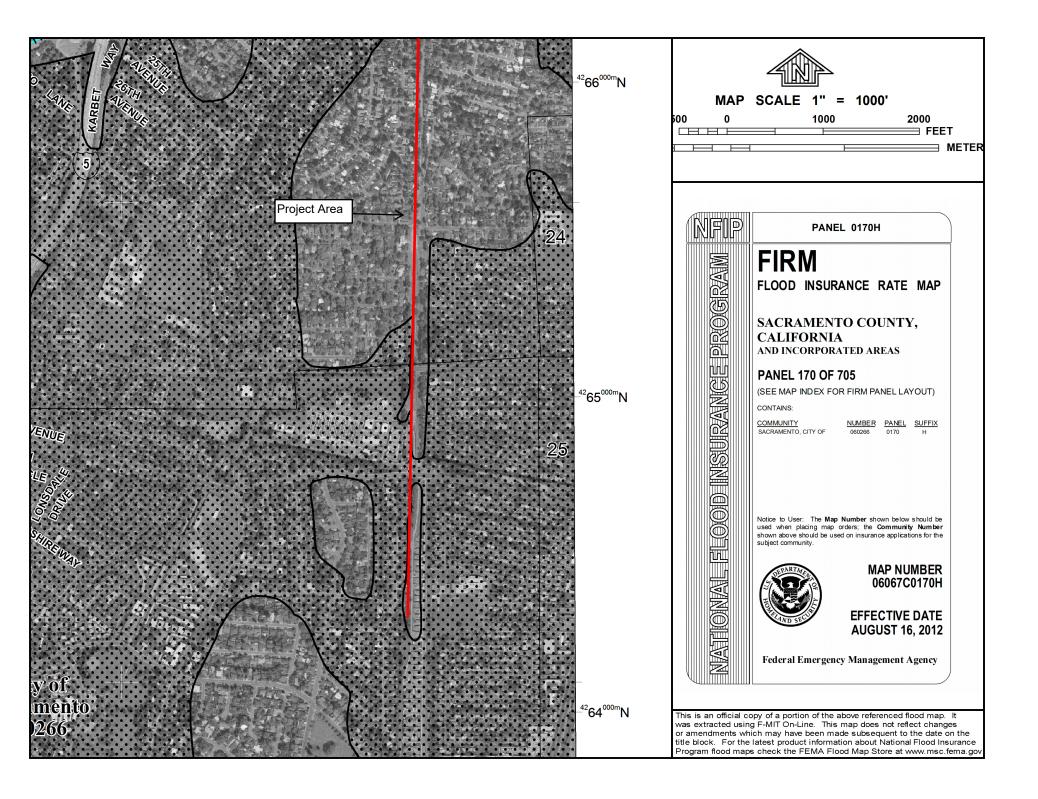
Good afternoon,

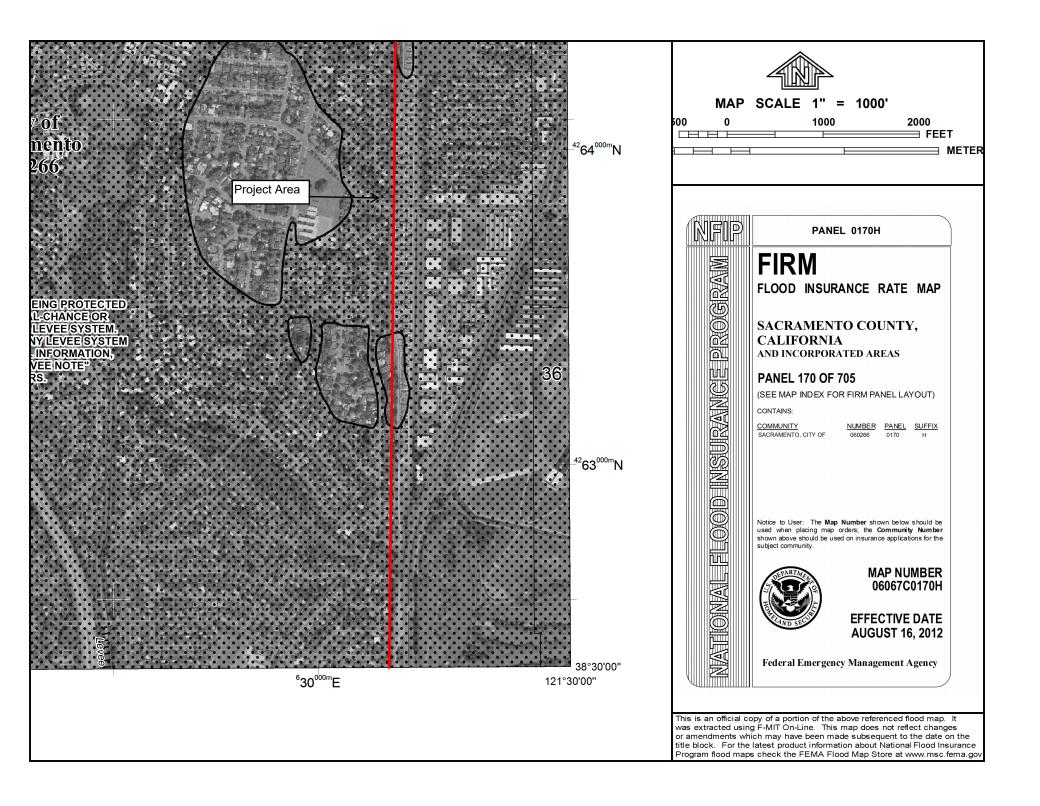
I am following up on CSO review of a NAE-SC-SOIS finding for the ATPL 5002 (189) Del Rio Trail Project. The HPSR package was submitted to CSO on or around October 4, 2018. Based on this submittal date, the 15-day review period acaroid to PA Stipulation X.B.1 appears to be up, unless delivery to your office was significantly delayed. Can you please provide an update on this review? If the review period is not complete, can you please let me know what date this document was received by your office so that I can calculate the appropriate 15-day period.

Thank you,

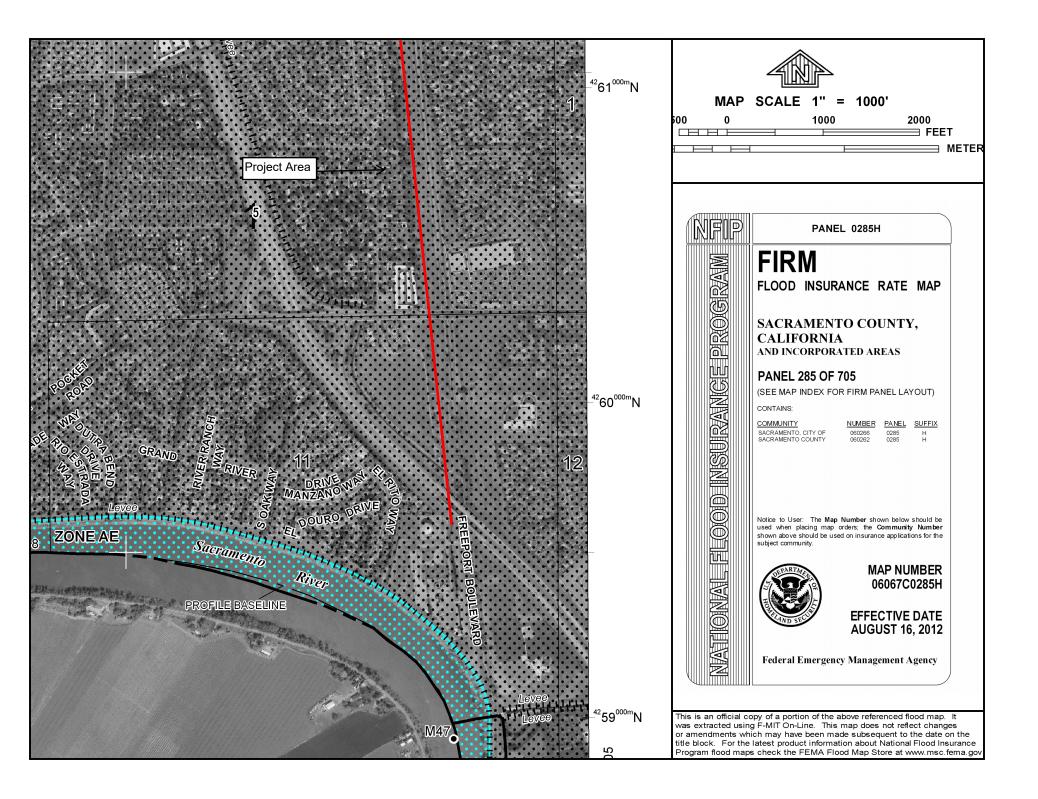
Lisa Machado, M.A.

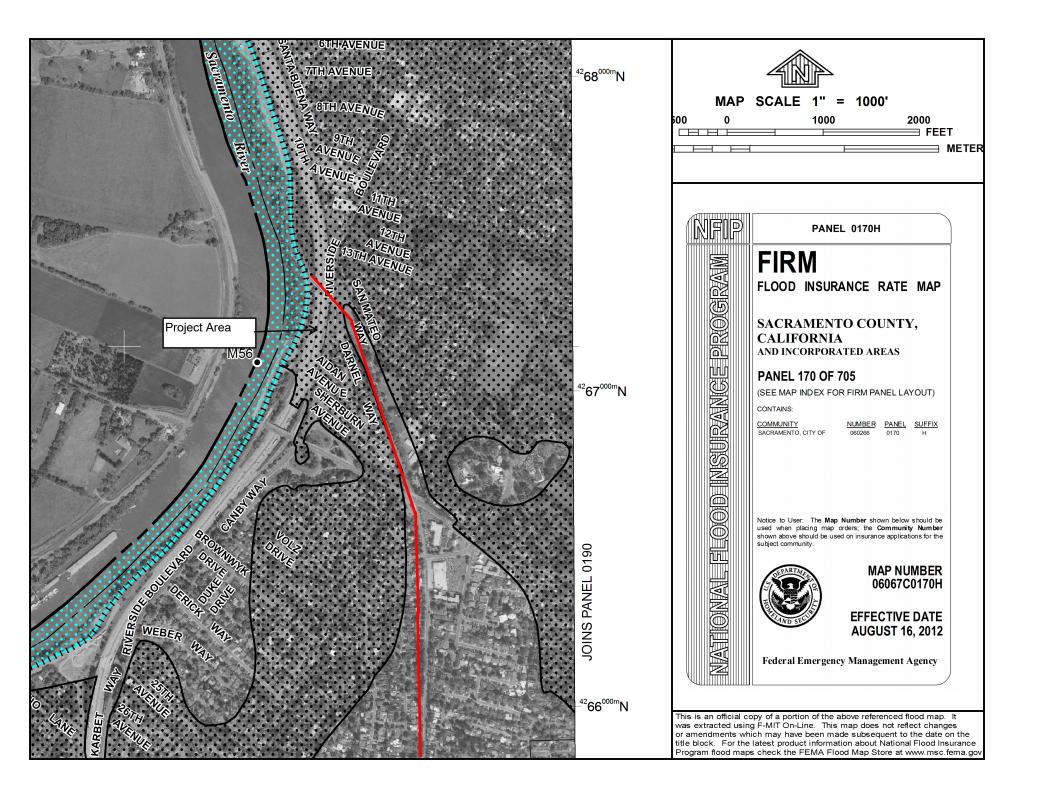
Associate Environmental Planner (Archaeology) California Department of Transportation, District 3 703 B Street, Marysville, CA 95901 (530) 741-4450 Fax: (530) 741-4457











Appendix J List of Acronyms

ACM AUL	Asbestos Containing Material Activity and Use Limitation
BMPs	Best Management Practices
BSA	Biological Study Area
Caltrans	California Department of Transportation
CDFW	California Department of Fish and Wildlife
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CHC	Cultural Heritage Commission
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CRHR	California Register of Historic Resources
CRLF	California Red-Legged Frog
CWA	Clean Water Act
DPS	Distinct Population Segment
EIR	Environmental Impact Report
ESA	Environmentally Sensitive Areas
FESA	Federal Endangered Species Act
FYLF	Foothill Yellow-Legged Frog
H ₂ S	Hydrogen Sulfide
HAER	Historic American Engineering Record level of service
LOS MBTA	Migratory Bird Treaty Act
MOA	Memorandum of Agreement
MTBE	Methyl Tertiary Butyl Ether
NEPA	National Environmental Policy Act
NES	Natural Environment Study
NMFS	National Marine Fisheries Service
NO ₂	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
O ₃	ozone
OSHA	Occupational Safety and Health Act
PBA	Programmatic Biological Opinion
PCE	Primary Constituent Element
PDT	Project Development Team
PM	particulate matter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
	particulate matter less than 10 microns in diameter
PS&E PQS	Plans, Specifications, and Estimates Professionally Qualified Staff
REC	Recognized Environmental Condition
RWQCB	Regional Water Quality Control Board
SHPO	State Historic Preservation Officer
SO ₂	sulfur dioxide
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
USACE	United States Army Corps of Engineers
USFWS	United State Fish and Wildlife Service
USGS	United States Geologic Survey
VOC	Volatile Organic Compound

Appendix K List of Technical Studies

These reports are available at the City of Sacramento Community Development Office and the City website.

Technical Study	
Natural Environment Study (Minimal Impact)	
Finding of No Adverse Effect Report and Action Plan	
Hazardous Waste Initial Site Assessment	
Soil and Ballast Testing Letter Report	
Visual Impact Assessment – Minor Level	
Water Quality Assessment Memorandum	
Section 4(f) De Minimis Finding	
Noise Technical Memorandum	
Traffic Control Technical Memorandum	

AGENCY AND STAKEHOLDER COMMENTS

Comment 1: Andrea Buckley, Central Valley Flood Protection Board (November 16, 2018)

STATE OF CALIFORNIA - CALIFORNIA NATURAL RESOURCES AGENCY EDMUND G. BROWN JR., GOVERNOR CENTRAL VALLEY FLOOD PROTECTION BOARD 3310 El Camino Ave., Ste. 170 SACRAMENTO, CA 95821 (916) 574-0609 FAX: (916) 574-0682 COMMUNITY DEVELOPMENT **L'EPARTMENT** November 16, 2018 NOV 2 3 2013 RICENTED Mr. Tom Buford City of Sacramento 300 Richards Blvd., 3rd Floor Sacramento. California 95811 Del Rio Trail Project, Draft Environmental Impact Report, Subject: SCH Number: 2018062009

Location: Sacramento County

Dear Mr. Buford,

Central Valley Flood Protection Board (Board) staff has reviewed the subject document and provides the following comments:

The proposed project is adjacent to the Sacramento River, a regulated stream under Board jurisdiction, and may require a Board permit prior to construction.

The Board's jurisdiction covers the entire Central Valley including all tributaries and distributaries of the Sacramento and San Joaquin Rivers, and the Tulare and Buena Vista basins south of the San Joaquin River.

Under authorities granted by California Water Code and Public Resources Code statutes, the Board enforces its Title 23, California Code of Regulations (Title 23) for the construction, maintenance, and protection of adopted plans of flood control, including the federal-State facilities of the State Plan of Flood Control, regulated streams, and designated floodways.

Pursuant to Title 23, Section 6 a Board permit is required prior to working within the Board's jurisdiction for the placement, construction, reconstruction, removal, or abandonment of any landscaping, culvert, bridge, conduit, fence, projection, fill, embankment, building, structure, obstruction, encroachment, excavation, the planting, or removal of vegetation, and any repair or maintenance that involves cutting into the levee.

Permits may also be required to bring existing works that predate permitting into compliance with Title 23, or where it is necessary to establish the conditions normally imposed by permitting. The circumstances include those where responsibility for the works has not been clearly established or ownership and use have been revised.

Mr. Tom Buford November 16, 2018 Page 2 of 2

Other federal (including U.S. Army Corps of Engineers Section 10 and 404 regulatory permits), State and local agency permits may be required and are the applicant's responsibility to obtain.

Board permit applications and Title 23 regulations are available on our website at http://www.cvfpb.ca.gov/. Maps of the Board's jurisdiction are also available from the California Department of Water Resources website at http://gis.bam.water.ca.gov/bam/.

Please contact James Herota at (916) 574-0651, or via email at James.Herota@CVFlood.ca.gov if you have any questions.

Sincerely,

Erden Breddy

Andrea Buckley Environmental Services and Land Management Branch Chief

cc: Office of Planning and Research P.O. Box 3044, Room 113 Sacramento, CA 95812-3044 Response 1:

Thank you for your comment. The proposed Del Rio Trail would encroach on the Sacramento River levee; therefore, an encroachment permit would be obtained from the Central Valley Flood Protection Board prior to construction. The project would also obtain a Section 408 permit from U.S. Army Corps of Engineers (USACE). The project would not result in any temporary or permanent impacts to Waters of the U.S.; therefore, a Section 404 permit from USACE would not be required.

Comment 2: Alex Fong, Department of Transportation (December 18, 2018)

STATE OF CALIFORNIA-CALIFORNIA STATE TRANSPORTATION ACENCY.

DEPARTMENT OF TRANSPORTATION DISTRICT 3 703 B STREET MARYSVILLE, CA. 95901 PHONE (530) 634-7616 FAX (530) 741-4111 TTY 711 www.dot.ca.gov/dist3



Making Conservation a California Way of Life.

EDMEND G. BROWN Jr., Governor

December 18, 2018

GTS# 03-SAC-2018-00334 SCH#: 2018062009

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

Del Rio Trail Project - Draft Environmental Initial Report (DEIR)

Dear Mr. Buford:

Thank you for including California Department of Transportation (Caltrans) in the application review for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System (SHS) in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/heath. We provide these comments consistent with the state's mobility goals that support a vibrant economy and build communities.

The City of Sacramento proposes to construct approximately 4.8 miles of Class 1 multi-use trail along the abandoned railway corridor west of Freeport Boulevard from south of Meadowview. Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road. The proposed Del Rio Trail Project (proposed Project) consists of a Class I multi-use trail (12 to 16 feet of pavement with unpaved shoulders ranging from 2 to 3 feet) and when feasible, an adjacent 5 to 6-foot wide unpaved walking trail. The proposed Project would cross Caltrans Right-of-Way (ROW) along Interstate 5 (I-5) at approximately post miles SAC_15.458 and SAC_20.05. Based on the information provided, Caltrans provides the following comments:

Encroachment Permit

An encroachment permit will be required from Caltrans for any work performed on the State ROW, if not previously obtained. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to:

> "Provide a safe, sussainable, integrated and afficient transportation system to withance California's seconomy and itrability"

Tom Buford City of Sacramento December 18, 2018 Page 2

> Hikmat Bsaibess California Department of Transportation District 3, Office of Permits 703 B Street Marysville, CA 95901

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

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

Sincerely,

ALEX FONG, Branch Chief Office of Transportation Planning - South

CC: State Clearinghouse

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

Response 2:

Thank you for your comment. At this time, the trail is not designed to cross Caltrans right of way along Interstate 5. Should the City determine during final design that work within the Department's right of way on Interstate 5 is necessary, an encroachment permit would be obtained prior to construction.

Comment 3: Plan Review Team, Pacific Gas & Electric (November 5, 2018)



Pacific Gas and Electric Company Plan Review Team Land Management PGEPlanReview@pge.com 6111 Bollinger Canyon Road 3370A San Ramon, CA 94583

November 5, 2018

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

Ref: Gas and Electric Transmission and Distribution

Dear Mr. Buford,

Thank you for submitting Del Rip Trail Project K15165100 plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

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

Below is additional information for your review:

A

В

С

D

 This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: <u>https://www.pge.com/en_US/business/services/building-</u> and-renovation/overview/overview.page.

2.	If the project being submitted is part of a larger project, please include the entire scope
	of your project, and not just a portion of it. PG&E's facilities are to be incorporated within
	any CEQA document. PG&E needs to verify that the CEQA document will identify any
	required future PG&E services.

An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

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

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

Sincerely,

Plan Review Team Land Management

PG&E Gas and Electric Facilities



Attachment 1 – Gas Facilities

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

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

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

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

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

 Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 12 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

PG&E Gas and Electric Facilities



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

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

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

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

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

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

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

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

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

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

PG&E Gas and Electric Facilities



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

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

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

PG&E Gas and Electric Facilities



Attachment 2 – Electric Facilities

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

 Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "RESTRICTED USE AREA – NO BUILDING."

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-toconductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 15 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

 Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for

PG&E Gas and Electric Facilities



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

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

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

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

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

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

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

PG&E Gas and Electric Facilities

Response 3A:

Thank you for your comment. The City will follow the appropriate application process for new electrical or utility services in the project area. Coordination with PG&E will occur during final design.

Response 3B:

The entire scope of the proposed project has been included within the EIR. The project would not require the use of gas or electric services from PG&E; however, PG&E gas lines exist within the project area. The City will coordinate with PG&E prior to construction.

Response 3C:

The City will coordinate with PG&E prior to construction to determine if the size and scope of the project warrants an engineering deposit for review.

Response 3D:

Should work occur within the PG&E fee strip and/or easement, the City will coordinate with the California Public Utility Commission as necessary.

Comment 4: Robb Armstrong, Sacramento Regional County Sanitation District (November 19, 2018)



Main Office

10060 Goethe Road Satramento, CA 95827-3553 Tel: 915.876.6000 Fax: 916.876.6160

Treatment Plant

8521 Laguna Station Road Elk Grove, CA 95758-9550 Tel: 916.875.9000 Fax: 916.875.9088

Board of Directors

Representing: County of Secremento County of Yole City of Citrus Heights City of Elk Grove City of Felsom City of Renche Cordova City of Renche Cordova City of Secremento City of West Secremento

Prabhekar Somavanpu

Custour Engineer

Rubon Robles Director of Operations

Christeph Inhson Desetter of Policy & Plannin

David O'Toslo

Jeacob Masstratti Chief Finanziat Officer

Noole Coleman Pablic Affairs Managar

www.regionalsan.com

2 Annual on Account Paral

November 19, 2018

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

Subject: Notice of Availability/Draft Environmental Impact Report for the Del Rio Trail Project (K15165100)

Dear Mr. Buford,

Sacramento Regional County Sanitation District (Regional San) has reviewed the Mitigated Negative Declaration and has the following comments.

The City of Sacramento (City) propose to construct 4.8 miles of Class 1 multi-use trail along the abandoned railway corridor west of Freeport boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road.

Regional San Advisories:

 Regional San has the City Interceptor (Regional San operating system N25), City Sump 2A (N29), City Sump 55 (N27) and associated easements located within the proposed project's boundaries. Regional San will require review and approval of all improvement plans associated with the proposed project.

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

Sincerely, Robb Armstrong

Robb Armstrong Regional San Development Services & Plan Check Response 4:

Thank you for your comment. The City will coordinate with the Sacramento Regional County Sanitation District regarding the proposed project prior to construction. RegionalSan will be provided an opportunity to review and comment on all Project plans if the proposed improvements would affect RegionalSan facilities.

Comment 5: Kevin McCarty, Assemblymember, 7th District (December 19, 2018)



DISTRICT OFFICE 915 L STREET, SUITE 110 SACRAMENTO, CA 95614 (916) 324-4676 FAX (916) 327-3338 SOCIAL MEDIA @AsmKevinMcCarty

Dear Mr. Buford:

I am writing to express my strong support for the Del Rio Trail project. This transformative project offers significant opportunities for South Land Park, it's the neighboring communities and the entire Sacramento region.

As the Assemblymember representing the area north of the proposed trail, I am confident that this project will have a positive effect on the entire region. Converting this 4 mile section of abandoned railway into an active transportation corridor will provide increased access to active modes of transportation to schools, retail, jobs, and recreational amenities will provide significant economic and community benefit. This project epitomizes the type of development that is needed for the Sacramento region to reach its ambitious environmental and transportation goals.

I fully stand in support with the South Land Park Neighborhood Association and residents in opposing any attempt to reactivate the rail line. This would introduce air and noise pollution and would sacrifice the trail design. It would also create hazards along the route and remove many more valley oaks than the City's proposed plan.

The Del Rio Trail project is a win-win for all of the Sacramento region. If there is anything that myself or my office can do, please do not hesitate to reach out.

Thank you for your consideration,

KEVIN McCARTY Assemblymember, 7th District

Printed on Recycled Paper

Response 5:

Thank you for your comment. The City appreciates your support of the proposed Del Rio Trail project.

<u>Comment 6:</u> Doris Matsui, Member of Congress (January 2, 2019)

DORIS O. MATSUI BTIL DISTRICT, CALIFORNIA COMMITTEE ON ENERGY AND COMMERCE

Congress of the United States House of Representatives Mashington, DC 20515–0506

WASHINGTON OFRCE 2311 RAYBURN HOUSE OFFICE BUILDING WASHINGTON, DC 20515-0508 (202) 225-7163 DISTRICT OFFICE

ROBERT I. MATSUI U.S. COURTHOUSE 501 I STREET. SUITE 12-600 SACRAMENTO, CA 98914 (916) 498-5600 http://matsui.house.gov

January 2, 2019

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

Dear Mr. Burford:

I am writing to express my support for the Del Rio Trail which has been made possible through a SACOG Regional Program Grant along with tireless dedication from the South Land Park Neighborhood Association.

The Del Rio Trail will add critical infrastructure to our region and support the City's Bicycle Master Plan. The Project will provide potential recreation amenities, access to bus stops, and will also function as a commuter route for those who prefer to bike to downtown jobs rather than drive on freeways and boulevards. The trail will also allow cyclists, pedestrians, runners, and dog walkers to safely travel to schools, parks, stores, and jobs with minimal exposure to motorized traffic.

This four-mile section of abandoned track is located in the heart of South Sacramento and an incredible opportunity for the City to provide more chances for Sacramentans to be active and healthy while also protecting our environment. The project goal is to offer routes for walking and biking for recreational and commuter trips alike; providing a north-south class one bike path that links South Sacramento neighborhoods to the Sacramento River Parkway and William Land Park.

As the original sponsor of the federal Safe Streets Act in Congress, I understand the numerous benefits of designing our roadways to accommodate all users. I am in full support of the South Land Park Neighborhood Association and the residents in opposing the activation of the rail line and the subsequent compromise in trail design. This project is well thought out and not only meets the goals of the City's Master Plan, but also helps to mitigate our air pollution and the emissions impact on our environment.

If there is anything my office can do to assist, please do not hesitate to reach out directly.

Sincerely,

PRINTED ON RECYCLED PAPER

Don's O Matsur

DORIS O. MATSUI Member of Congress Response 6:

Thank you for your comment. The City appreciates your support of the proposed Del Rio Trail project.

Comment 7: Cheryl Marcell, California State Railroad Museum Foundation (January 3, 2019)



Honoring the past. Inspiring the future.

January 3, 2019

Via E-Mail (thuford@cityofsacramento.org) and Hand Delivery

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

Re: Comments to the Draft Environmental Impact Report for the Del Rio Trail Project

Dear Mr. Buford:

Please accept these comments from the California State Railroad Museum Foundation (the "Foundation") in response to the November 2018 Draft Environmental Impact Report for the Del Rio Trail Project ("Draft EIR").

THE FOUNDATION'S INTEREST

The Foundation is an official cooperating association with California State Parks and a 501(c)(3) organization. The Foundation provides funding for ongoing support of numerous programs at the California State Railroad Museum in Old Sacramento, Railtown 1897 State Historic Park in Jamestown, and the future use of historic facilities in the Railyards as an adjunct to the museum.

With almost 12,000 members, the Foundation's mission is to generate revenue and awareness on behalf of its destinations, while supporting the preservation, interpretation, and promotion of our railroad heritage. As the Del Rio Trail project team knows from meetings with us on December 8, 2017, and April 4, 2018, the Foundation strives to protect the heritage of the Sacramento Southern Railroad, also known as the Walnut Grove Branch Line. Indeed, in our December 2017 meeting with the project team, a Dokken Engineering representative acknowledged that the Foundation is among the "stewards of the resource," referring to the Walnut Grove Branch Line and its status as a historical resource under state and federal law.

The Del Rio Trail will utilize Sacramento Southern's right-of-way. As the project team has conceded, and as ample documentation proves, a bike trail and preservation of the rails are not contradictory. However, the Foundation's goal is not just preservation of the rails, but to prevent the city from altering the rails in ways that would preclude all future use of any kind or nature.

State Parks has long considered a future excursion train from a new station on Pocket Road to the town of Hood on existing rails. The loss of the connection along the Del Rio Trail will be devastating to this plan. A future excursion train will need a cost-effective means to move rolling stock, as needed, to and from shops in Old Sacramento. Contrary to the fears of those who oppose any possible use of the rails through South Land Park, the slow movement of rolling

106 K Street, Suite 200 Sacramento, CA 95814 www.csrmf.org stock would be infrequent, and the use of clean-diesel or even electric vehicles would limit or eliminate exhaust, reduce noise and vibration, and ease any safety concerns.

However, the city has allowed the South Land Park Neighborhood Association to hijack the trailplanning process. The Del Rio Trail Adopted Policy Position, approved by the South Land Park Neighborhood Association ("SLPNA") board on November 2, 2016, makes no secret of SLPNA's intent to use the trail as the means to prevent any future use of the rails. (See first attachment). Documentation shows the project team's close cooperation and coordination with SLPNA to further its strategy while giving only lip service to other stakeholders, including the Foundation.

SLPNA's plan would benefit a handful of residents who bought homes with full knowledge that their homes abutted the Del Rio corridor, even though other South Land Park residents and numerous city residents support retention of the rails. We do not believe an effort to prevent potential future use is a proper purpose under the California Environmental Quality Act ("CEQA") or the National Environmental Policy Act ("NEPA").

Please do not lose sight of the fact that the Foundation wholeheartedly supports the Del Rio Trail as a multi-use trail for making the most beneficial use of the right-of-way. We resent that SLPNA promotes the false argument that the community faces a choice between rails and a trail. They are both compatible.

THE FOUNDATION'S CONCERNS

The Draft EIR Does Not Adequately Consider A No-Walking-Trail Alternative.

As described in the Draft EIR, the Del Rio Trail Project envisions a dual-trail design, with a paved trail for bicycles and a gravel trail for walkers. The project team defends this unprecedented proposal as a means to limit bicycle-pedestrian conflicts. But, as noted below, the proposal cannot achieve this goal. Of greater concern, the Draft EIR proposes to use the space between the rails as the walking trail for much of the trail's extent, altering the historical resource and insinuating to trail users that walking between rails is a safe and accepted norm.

In our response to the city's Notice of Preparation, the Foundation asked the city to consider an alternative to its proposal for separate walking and biking trails (see Letter of July 9, 2018, Cheryl Marcell to Tom Buford). As we noted in that letter, the project team has conceded that preservation of the rails does not conflict with the paved, multi-use trail. In fact, the 1994 EIR for Regional Transit's consideration of a transit route along the Del Rio corridor acknowledged that the right-of-way would accommodate both a light-rail train and parallel excursion train tracks. Therefore, any argument that the Del Rio corridor could not accommodate both a paved trail and rails defies common sense and the evidence.

The project team has also conceded that the walking trail will not be compliant with requirements of the Americans with Disabilities Act, so the city will be unable to prohibit walkers from using the bike trail. That concession creates a dilemma for the city. The state's Highway Design Manual and the California Vehicle Code require walkers to use a walking trail

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when one is provided, but the city will be unable to do so because the walking trail is not ADA compliant. (See Cal. Hwy. Design Manual, 1003.1(2) (Nov. 20, 2017) ("The CVC requires a pedestrian to use a pedestrian facility when adjacent to a bike path."); Cal. Veh. Code § 21966.)

The walking trail is also a costly redundancy. The project team plans to construct a paved trail with the usual two-foot shoulders of decomposed granite to accommodate walkers and runners – an obvious necessity if the city cannot prohibit walkers from using the bike trail. Thus, the walking trail adds to costs of the trail project and will delay its completion since the city did not obtain full funding from the Sacramento Area Council of Governments to complete the dual-trail project.

As noted above, the project team claims a need for the walking trail because of complaints about walker-bicyclist conflicts. However, we believe the city has yet to consider alternatives, such as an ordinance – like a county ordinance that governs the American River Bike Trail – requiring runners and walkers to use the shoulders on the left side of the trail and imposing a speed limit on bicyclists. The lack of an ordinance means that the city makes no real efforts, such as signage and enforcement, to reduce potential conflicts among users.

Despite these considerations, the Draft EIR notes that the no-walking-path alternative "would ultimately result in the same amount of track removal as the Project (approximately 2 percent) even without the proposed walking path" (Draft EIR at 293). However, CEQA and NEPA require consideration of plans that *alter* the historical resource, as well as those that remove any of the historical resource. The Draft EIR is inadequate for its failure to consider the alteration of the historical resource, and for the failure to consider that pouring a "traversable surface such as decomposed granite" between the rails will hasten degradation of the historical structure, including the ties and the ballast.

At a minimum, the city should have considered alternatives such as regulation before proposing to spend funds on a walking trail that is unlikely to address the concerns raised by the project team (not to mention that the creation of a walking trail between rails encourages the unsafe practice of walking between rails elsewhere). Given the questionable benefits of the walking trail, the city's plans would be less objectionable and more cost effective by opting for a single, paved, multi-use trail without a separate walking trail. The result would be a plan that avoids alteration of the historical resource to create a redundant and ineffective walking trail. The Draft EIR is inadequate for its failure to fully and fairly discuss an alternative that omits the walking trail.

B. <u>The Draft EIR Incorrectly Concludes That The Project As Mitigated Reduces Impacts To</u> The Historical Walnut Grove Branch Line To A Less Than Significant Level.

The Draft EIR concludes that, without mitigation, the Project will result in a potentially significant historical resource impact. Mitigation Measure CR-1 is proposed to reduce the impact to a less than significant level. There are several flaws with the Draft EIR's postmitigation significance conclusion.

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First, the Project proposes pouring a "traversable surface such as decomposed granite" between the rails. The Draft EIR fails to acknowledge or analyze whether placing a traversable surface between the tracks will hasten degradation of the historical structure, including the ties and the ballast. Without such analysis, the Draft EIR fails as an informational document and fails to support the conclusion that the Project as mitigated will reduce the Project's significant historical resource impact to a less than significant level.

Second, as the Draft EIR acknowledges, "[t]o avoid adverse effect . . . the work must comply with the Secretary of the Interior's Standards for Treatment of Historic Properties." (Draft EIR at 144.) The Draft EIR suggests the Project will be implemented to comply with the Secretary of Interior's Rehabilitation Standards. However, the first such standard requires that the "new use . . . require[] minimal change to the defining characteristics of the building and its site and environment." One of the critical historical characteristics of the Walnut Grove Branch Line is its ability to be used for operation of rail.

As the Project substantially reduces the potential ability for the tracks to be used for its historical purpose in the future, the impact is necessarily significant pursuant to the Rehabilitation Standards. Indeed, the Secretary of Interior defines rehabilitation "as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values." (Secretary of Interior Standards, p. 2 (emphasis added).) As the Project renders use of the Walnut Grove Branch Line for its historical purpose impossible (or, at least, financially infeasible), the Project – by definition – is not a compatible use and does not constitute a rehabilitation project.

Third, Mitigation Measure CR-1 constitutes impermissibly deferred mitigation pursuant to CEQA and is inadequate to reduce the Project's significant historical impact to a less-thansignificant level. CR-1 merely requires that the City implement the Caltrans approved Action Plan during each state of undertaking the Project. The Action Plan, in turn, requires that the City "[p]reserv[e] tracks in place where they exist when feasible." While the mitigation measure purports to limit impacts to the tracks based on feasibility, the Draft EIR includes no meaningful analysis of why it is infeasible to preserve portions of the tracks that the Project proposes to destroy or relocate. Thus, the Draft EIR fails as an informational document as it does not support the implicit conclusion that the tracks proposed to be removed could not feasibly be retained.

The Findings of No Adverse Effect include inconsistent bare conclusions regarding why some tracks are not feasible to retain, suggesting in one place that removal is "proposed only where necessary for safety . . . or where the skew of the existing track against the alignment of the proposed multi-use trail will cause a safety hazard" and in another where necessary to meet "ADA requirements." (See, e.g., Findings of No Adverse Effect, pp. 5, 40.) To avoid improperly deferring a determination concerning the feasibility of retaining tracks impacted by the Project, the Draft EIR must include a discussion and supporting evidence concerning the feasibility of preserving impacted tracks.

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Evidence in the record demonstrates that the City could feasibly avoid most if not all impacts to the historical resource. As one example, the EIR states that "[a]t the intersection of 27th Avenue/Normandy Lane/Del Rio Road, the existing embankment and ramps do not meet current ADA requirements and must be lowered accordingly." (Draft EIR at 146.) However, in an e-mail to the SLPNA in February 2017, a consultant argued: "Lowering the grade of the path alignment would provide ADA compliant access with the least impact to the adjacent streets. If the overall desire is to keep the path at its current grade, access would have to be provided with ADA compliant ramps, landings, and (likely) retaining walls." (See second attachment.)

Implicitly, the consultant concedes that the city can provide ADA-compliant access without removing the rails or the "current grade." Thus, it appears alternatives to destroying the existing embankment was not rejected due to the lack of a feasible alternative but, presumably, because the alternatives may be more expensive. While – via a statement of overriding considerations – a lead agency may conclude that an alternative with reduced environmental impacts is infeasible, it may not implicitly reach that conclusion as part of the basis for concluding an impact is less than significant after mitigation.

Fourth, to the extent alleged safety concerns are part of the basis for the current design of the Project, the Draft EIR fails to acknowledge that the design of the Project creates safety concerns. Specifically, as noted above, encouraging pedestrians to walk on trails between railroad tracks can encourage the unsafe practice of walking between rails elsewhere. Furthermore, also as noted above, the decomposed granite proposed between the tracks threatens significant degradation of the tracks covered by the material (an impact that is not acknowledged in the Draft EIR). Instead, the Findings of No Adverse Effect states that use of such materials constitutes a "reversible alteration."

This conclusion not only ignores the before-mentioned physical damage to the tracks, but also ignores that dangers of encouraging the public to walk on these tracks while suggesting that the trail could be removed to allow for future use of the historical railway. If the risk of walking adjacent to a bike trail (as is common throughout the region) is considered against the risk of encouraging pedestrians to walk between a rails (a highly uncommon and dangerous activity), there is no question that the dual trail proposal is not only substantially more expensive to complete but is significantly less safe than a single multi-use trail.

The Draft EIR and available evidence illustrates that, even after implementation of Mitigation Measure CR-1, the Project will significantly impact the environment by altering the historic resource as to its physical integrity. (See, e.g., Committee to Save the Hollywoodland Specific Plan v. City of Los Angeles (2008) 161 Cal.App.4th 1168, 1187 [stating that placing a fence on top of an historic wall "will significantly impact the environment by altering the historic resource, both as to its physical integrity and its aesthetic appeal from the neighboring streets"].)

To comply with CEQA, the Draft EIR must be revised to acknowledge that the Project, as proposed, will result in a significant and unavoidable historic resource impact. Such disclosure is necessary to ensure both the public and the City Council understand the true consequences of the Project and that the City Council takes the necessary step of considering whether any justifiable overriding considerations support moving forward with the Project, as proposed, notwithstanding

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its significant historic resource impacts. The Foundation strongly believes that, if the City Council properly considers this question, the Council will conclude that overriding considerations do not justify approving significant impacts to the historical Walnut Grove Branch Line, particularly where a more cost effective multi-use trail could be approved as an alternative to the proposed Project.

C. <u>The Draft EIR Does Not Consider An Alternative To The Removal Of Historical</u> Resources At Del Rio Road.

In the Foundation's response to the Notice of Preparation, we also proposed that the city consider abandonment of the Del Rio Road crossing of the tracks and trail at Del Rio Road. According to the project team, as reflected in maps and explained in our April 4 meeting, the city proposed to remove 169 feet of rails at the Del Rio Road crossing and to remove the former levee at this location to bring both sides of the crossing to grade level. To accomplish its goal of preserving more than 98% of the rails, the project team proposes to move the rails to a section where rails were removed and not replaced during a sewer pipe installation some years ago (though the missing section is less than 169 feet).

As explained to us in our prior meetings, the purported purpose of the rail removal and alteration was to make the Del Rio Road crossing safer. As we noted, however, the city can accomplish even more without undue hardship by simply abandoning the Del Rio Road crossing of the rails. Better alternatives for north-south vehicle passage exist on South Land Park Drive and Freeport Boulevard. The current and proposed Del Rio Road intersection funnels westbound vehicles onto neighborhood streets that were not intended as thoroughfares. In fact, crossing the tracks from east to west funnels traffic into neighborhood streets with no sidewalks, and where motorists often encounter pedestrians and bicycling families in the roadway. Making the intersection at Del Rio Road and 27th Avenue seem "safer" (as now planned) will only encourage faster speeds and greater threats to pedestrians and bicyclists using Del Rio Road west of the trail. The alternative routes are obviously thoroughfares and do not raise these safety concerns.

The abandonment of the Del Rio Road crossing creates an additional benefit for the Del Rio Trail: elimination of a road crossing. The result will be a safer trail for all users, and a more cost-efficient trail plan. Therefore, we asked that any EIR fully address the prospect of abandoning the Del Rio Road crossing of the rails and the trail.

Interestingly, however, the Draft EIR does not appear to tout the safety of the intersection as the reason for removing rails and eliminating a section of the historical levee. Now, the project team alleges: "At the intersection of 27th Avenue/Normandy Lane/Del Rio Road, the existing embankment and ramps do not meet current ADA requirements and must be lowered accordingly." (Draft EIR at 146.) In an e-mail to the SLPNA in February 2017, a consultant argued: "Lowering the grade of the path alignment would provide ADA compliant access with the least impact to the adjacent streets. If the overall desire is to keep the path at its current grade, access would have to be provided with ADA compliant ramps, landings, and (likely) retaining walls." (See second attachment.)

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Implicitly, the consultant concedes that the city can provide ADA-compliant access without removing the rails or the "current grade." Since the city no longer seems to argue the need for a safer intersection, we presume that the city rejects this alternative because of cost – despite the city's eagerness to spend funds on a redundant and ineffective walking trail. The consultant also concedes that the plan is to provide "the least impact to adjacent streets," even though the focus should be on the impact to the historical resource.

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Moreover, the Draft EIR correctly notes that certain features qualify the route and rails for inclusion on the National Register of Historic Places, and the "Most Significant" features are the "Location and track alignment" and the "Elevated embankment (intermittent)." Yet, the city proposes to remove the elevated embankment within the urban area where trail users can view and appreciate this feature, all to avoid impact to roads while creating maximum and irreversible impacts to the historical rails. The Draft EIR makes no effort to explain how the removal this significant feature does not result in a significant and unavoidable historical resource impact. The Draft EIR is inadequate for its failure to consider these issues or to analyze the issues in the manner prescribed by law.

D. The Draft EIR Makes Only Conclusory Claims About The Need To Remove Rails Or Encase Them In Concrete For Alleged Safety Reasons.

The Foundation has urged the project team to preserve the potential for future use of the rails, rather than altering the tracks in ways that will make future use difficult or impossible. But we have also stressed that future use will be subject to city approval and the full environmental process. We are asking the city to avoid decisions now that will preclude future consideration for use of the rails.

The protection of future use is more consistent with federal guidelines for a finding of no adverse effect. As the Draft EIR instructs, "[t]o avoid adverse effect..., the work must comply with the Secretary of the Interior's Standards for the Treatment of Historical Properties." This includes the standard that "[a] property shall be used for its historic purposes or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment." (Draft EIR at 144.) (In fact, even a cursory analysis of the rehabilitation standards strongly supports the Foundation's position that the Draft EIR simply ignores federal standards to make a finding the city's plans have no adverse effect on the historical rails and route. (See Draft EIR at 142-45.))

The Draft EIR summarizes plans for removal and alteration of rails:

Track removal is limited to the following areas:

- North of Z'Berg park, where the skew of the existing track against the proposed bike path creates a safety hazard
- Roadway approaches, where the skew of the existing track against the proposed bike path creates a safety hazard
- At the intersection of Sutterville Road, to increase safety at the crossing. In addition to increasing safety, track removal at this location will

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facilitate other Project goals and safety features, including reducing the intersection length and improving the visibility of new signals. A wooden trestle bridge that was partially burned in an accidental fire and is now unsafe.

Track will be retained in place and encased in concrete at the following locations:

- South Land Park Drive
- Del Rio Road
- 35th Avenue
- 43rd Avenue

Track will be salvaged and reused in adjacent areas to the following locations:

- The vicinity of the 27th Avenue/Normandy Lane/Del Rio Road intersection
- Across the waterway south of Charlie Jensen Park

(Draft EIR at 145.) The Draft EIR provides far too little information to justify most of the proposed impacts, and fails to consider alternatives that would limit impact to the historical rails and the integrity of the route.

The Draft EIR proposes to remove rails "where the skew of the existing track against the proposed bike path creates a safety hazard." We understand from our meetings that the project team wants to remove rails where the bike path does not cross the rails perpendicularly. (See third attachment.) However, we find no analysis why the city did not consider perpendicular crossings rather than "skewed" crossings, why the project team considered the alternative of avoiding a crossing altogether, or why the project team did not consider a perpendicular crossing at another location where a perpendicular crossing was feasible. Therefore, the Draft EIR's analysis is inadequate.

Moreover, the city can keep the tracks in place with "flangeways" to preserve future use of the rails, and use rubber inserts to make the crossing easier for bicycles to cross. The city has already made use of these devices at the southern end of the proposed Del Rio Trail. The Sacramento River Bike Trail crosses the rails at the Freeport Regional Water Intake Facility along Freeport Boulevard to give trail users access to the Bill Conlin Youth Sports Complex. (See fourth attachment.) Similarly, the city can do the same at all road crossings to avoid the damage caused by encasing rails in concrete.

We have already addressed the removal of rails at the Del Rio Road crossing The Draft EIR also proposes the removal of rails "south of Charlie Jensen Park" and the removal of a "wooden trestle bridge that was partially burned in an accidental fire." These appear to address the same location. The proposal leaves us perplexed why the project team believes it is necessary to remove the historical trestle and rails, divert the trail to the area where the trestle has been removed, rather than simply continuing the trail in a straight line and construct a new bridge at that point, avoiding any need to remove the trestle and rails. (See fifth attachment.)



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From what we can tell, the Draft EIR includes little to no discussion or evidence to support these conclusions. Therefore, the Draft EIR is again inadequate and fails to address these issues in the manner prescribed by law.

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The Foundation appreciates this opportunity to provide comments on the Draft EIR. We recognize that, with the hundreds of pages comprising the Draft EIR and its attachments (not to mention the thousands of pages in the references), we might have missed documents that are relevant to our concerns. We would be happy to meet with the project team again to discuss ways to assuage our concerns, or to discuss any compromises that address our concerns and those of other stakeholders.

If you need any additional information about our concerns, please do not hesitate to contact us.

Sincerely,

Cheng Marcell

Cheryl Marcell President & CEO

Atts.

ATTACHMENT 1

DEL RIO TRAIL ADOPTED POLICY POSITION South Land Park Neighborhood Association

Policy and Background on Del Rio Trail Proposal Adopted by SLPNA Board Nov. 2, 2016

Background: The South Land Park Neighborhood Association (SLPNA) is a nonprofit organization representing an area of over 13,000 residents in the southwest section of the City of Sacramento. SLPNA works closely with local, state, and federal officials, residents, business owners, schools, and nonprofits to protect and improve the neighborhood. In 2013 and 2014, SLPNA spearheaded an effort to oppose the State Parks General Plan & EIR for Old Sacramento. This General Plan called for the operation of tourist trains on an abandoned rail corridor owned by Regional Transit, that cuts through South Land Park residential neighborhoods. After significant public pressure, the State Parks General Plan was amended to remove the neighborhood rail corridor. Since 2014, SLPNA has led a movement to actively promote the SACOG/City of Sacramento plan to build a multi-use trail on the four-mile long right of way.

Opposition to Rail Traffic: The South Land Park community spoke very clearly in 2014 that residents adamantly oppose any train traffic in our quiet residential area. Hundreds of petitions were signed by residents, and hundreds of people showed up to oppose the plan at community meetings and State Parks and Recreation Commission hearings. In January 2014, then-Senator Darrell Steinberg requested that the Commission delay their vote on the General Plan and EIR, and confer with residents in South Land Park, who were completely blindsided by the Parks proposal to run trains on the corridor. This 4-mile strip of land had become a cherished community greenbelt in the 40 years since it was abandoned by the railroad. The tourist train issue motivated neighbors to quickly organize: block captains were established; volunteers knocked on doors to inform the public of the train plan; flyers were distributed; and elected officials were swamped with calls and emails from concerned citizens.

After several months of community meetings, press stories, and pressure on local and state officials, State Parks removed the neighborhood rail proposal from their Old Sacramento General Plan. Within days of the Commission amending their General Plan, SLPNA immediately formed a trail committee, and began advocating for the Del Rio Trail, which was already part of Sacramento's bicycle master plan. The City worked with SLPNA to host a neighborhood forum on the trail plan, and surveyed 2700 residents as to their desire for the property. Schools, residents, and businesses throughout the neighborhood were surveyed: 83% of respondents support the trail concept.

SLPNA has the following stances related to the abandoned railroad right-of-way:

 SLPNA strongly opposes any trail plans that would allow any train traffic on the abandoned rail corridor south of South Land Park Drive (near Sprouts/LaBou).
 SLPNA believes that State Parks and the Railroad Museum may propose a "trail with rail" concept at some point. This would evoke significant community opposition.

- SLPNA strongly supports the development of the Del Rio Trail. The key benefits will be providing area residents with a safe walking and biking route to schools, parks, shopping and other amenities.
- Ideally, the trail should be a serene neighborhood amenity and not a "bike highway" of speeding cyclists (i.e., the trail design should ensure safety for walkers, joggers, dog walkers, and nature explorers, in addition to accommodating bicycle traffic).
- 4. The corridor should feature parklets, community gardens, winding routes, natural settings, incorporate native plantings where possible, plus benches. The trail should preserve large trees and foliage whenever possible. 1354 Palomar Circle urban garden should be included as part of the trail design.
- The City and its consultants are encouraged to consult with UC Davis Landscape Architecture department, which has offered its students to work on trail design for class credit.
- Dog walking or a dog park should be included where feasible, since portions of the corridor are already used as a dog walking area.
- The Sutterville Preschool should be consulted by the City and its consultants, due to the school's ongoing issues with traffic on Fruitridge at Gilgunn.
- Landscaping and natural plantings, benches and park-like settings should be included at the major intersection of Florin and Freeport Blvd.
- 9. An "adopt a trail" program should be launched that includes support from nearby businesses, schools, and neighborhood associations. This program would include trail cleanup days, design ideas, donations for adding amenities and maintaining the corridor. Naming opportunities should be considered for trail sections, benches and other features, to offset building/maintenance costs.
- 10. The East Land Park Subdivision should be closely consulted, since the corridor directly impacts homes in this subdivision. It is unclear if residents on this street prefer the trail on the east median, the street, or on the rail corridor.
- Residents living nearest to the corridor should be invited to provide input on trail design and access points.
- 12. Public safety and residential privacy must be high priorities in trail design.
- 13. Adequate environmental analysis should be conducted prior to construction. Such analysis should take into consideration impact of removing the creosote-soaked rail ties and metal rails (i.e., is it better to leave rails untouched or covered with soil to avoid ejecting toxins into the air?). Toxic herbicides should be avoided where possible to reduce residential and pet exposure.
- 14. Public art should be considered for installation along the corridor.

The above policy was adopted by unanimous vote of the SLPNA Board of Directors on Nov. 2, 2016.

 From:
 Charles Hughes

 To:
 "Chuck Hughes"

 Subject:
 FW: Del Rio Trail - Configuration at Del Rio

 Date:
 Thursday, February 09, 2017 8:11:46 PM

 Attachments:
 Del Rio Rd Realignment Options off

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Trail Committee and Interested People,

I received a couple of comments/questions regarding the height of the Trail Right-of-Way (ROW) in the area of the Del Rio Road Crossing, and proposed grade changes. I asked the engineer for a little more clarification on that point and her response is below for those who are interested.

Thanks, Chuck Hughes

From: Pamela Dalcin-Walling [mailto:pdwalling@dokkenengineering.com] Sent: Thursday, February 09, 2017 6:03 PM To: Charles Hughes; 'Brian Ebbert' Cc: 'Judith Matsui-Drury'; Ryan Neves; Meagan Luevano (meagan@crockercrocker.com) Subject: RE: Del Rio Trail - Configuration at Del Rio

Hi Charles- Your interpretation is correct...the area between Del Rio Road and 27th Avenue south of Normandy Lane along the path alignment is proposed to be lowered to more closely match the grades of the adjacent roadways – in both options. The reason for the proposed lowering of the grade is to provide ADA compliant accessibility to the path. The current access provided near the bend along 27th Avenue and Del Rio Road (pictured attached) is not ADA compliant and cannot be replicated due to state/federal requirements. Lowering the grade of the path alignment would provide ADA compliant access with the least impact to the adjacent streets. If the overall desire is to keep the path at its current grade, access would have to be provided with ADA compliant ramps, landings, and (likely) retaining walls. In that scenario, only Option 1 would be feasible.

I hope that this helps paint a more complete picture. Let me know if you have any additional questions!

Pamela Dalcin-Walling, P.E.

Project Manager

916.858.0642 (Office) (Cell)

From: Charles Hughes [mailto:cchughes] Sent: Wednesday, February 8, 2017 9:39 PM To: Pamela Dalcin-Walling; 'Brian Ebbert' Cc: 'Judith Matsui-Drury'; Ryan Neves; 'Lucy Eidam Crocker' Subject: RE: Del Rio Trail - Configuration at Del Rio

Hi Pamela,

I've had a couple people comment on the height of the existing ROW in that area. When I read your comment below that "we are proposing to lower the existing alignment" that sounded to me like the plan was to lower the ROW to approximately the same grade as the streets on either side, regardless of alternative. But perhaps I was assuming too much. Can you give a little more detail about the proposed grade change for the ROW and whether it differs by alternative?

I expect we will get some comments. I've had 3 responses in 24 hrs. so far and I've encouraged people to share the alternatives and opportunity to comment with their neighbors near this intersection.

Thanks, Chuck Hughes

From: Pamela Dalcin-Walling [mailto:pdwalling@dokkenengineering.com] Sent: Tuesday, February 07, 2017 6:57 PM To: Brian Ebbert (b.ebbert@dockenengineering.com) Cc: Judith Matsui-Drury; Ryan Neves; Lucy Eidam Crocker Subject: Del Rio Trail - Configuration at Del Rio

Hi Brian/Charles- We had our project kickoff meeting with the City today and put together a game plan for moving forward with the Project Approval/Environmental Document phase of the project (very exciting!). As part of this planning effort, we identified a location where we would really like to get some advance feedback from the immediate neighborhood and wondered if you could help in this regard?

The location in question is where the trail crosses Del Rio Road. In the existing condition, the existing trail/tracks cross Del Rio Road at a three-way intersection that has uncontrolled turn movements and sight distance issues as well as ADA access restrictions. To solve these issues and establish a safe crossing, we are proposing to lower the existing alignment and reconfigure the roadway connectivity. We have come up with a couple of alternatives that include reconfiguring Del Rio Road into a T-intersection with Normandy Lane and extending Normandy Lane to a three-way stop controlled intersection with 27th Avenue (Option 1) OR shifting the Del Rio Boulevard intersection 300 feet to the south and creating a three-way, stop-controlled intersection with 27th Avenue (Option 2). Schematic exhibits of these options are shown in the attached PDF.

In terms of achieving our technical objectives (safety, sight distance, ADA compliance), both options work. So it really becomes a question of, which option is most desirable to those who will be driving it? Would the Trail Committee be able to pose these options to those in that neighborhood to see which one is more favorable?

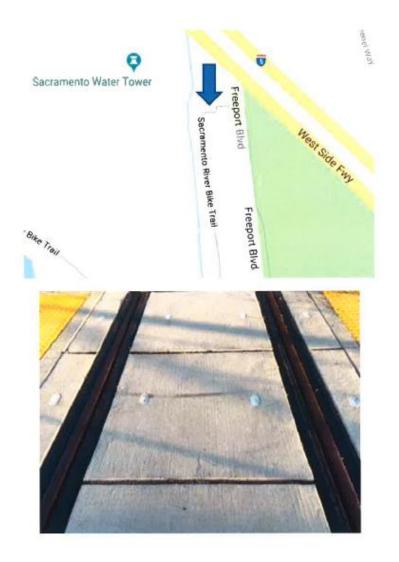
Please let us know your thoughts. Thank you!

Pamela Dalcin-Walling, P.E. Project Manager

Dokken Engineering

110 Blue Ravine Road, Suite 200 Folsom, CA 95630 916.858.0642 (Office) (Cell)







Response 7A:

Thank you for your comment. The City is dedicated to public outreach and ongoing public communications with all interested stakeholders including, but not limited to, 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 7B:

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 Available: 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.

Response 7C:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 7D:

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 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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 7E:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 7F:

The project's purpose 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. A City ordinance governing trails within the City is not a component of the project at this time, but the suggestion is noted and may be considered by the City at a future date.

Response 7G:

Decomposed granite is very similar to railroad ballast. Railroad ballast is often made of granite. The main difference between the two materials is the size of the rocks with DG particles typically being smaller than ballast particles. Thus, DG, or similar traversable surface made of small particles, is compatible with the historic property in terms of both material and design. Normal wear is expected as part of the reactivation of the property, just as it would be expected if the property were to be used as a functional rail line again; however, there is no evidence to suggest that adding the surface between the ties would cause any accelerated degrading of the existing ballast or timber. Furthermore, both the ballast and ties are common railroad features that could be replaced in-kind without impacting the property's integrity if they were to deteriorate beyond repair. It is not likely, however, that such deterioration would be caused solely by the proposed, compatible, traversable surface.

Based on public comment, and in an effort to further minimize environmental impacts, the proposed Build Alternative in the DEIR has been revised to remove the separate walking trail.

Response 7H:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 7I:

Use or historical purpose are not protected by the Standards. The majority of the property's features that convey its significance will remain. The ability of a historic property to convey its historic significance is not inextricably tied to its use. The historic property may no longer function as a railroad line, but its original use will remain evident and it will retain sufficient integrity to remain eligible for designation. This approach complies with the Standards.

Response 7J:

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 7K:

South of the Del Rio Road/27th Avenue/Normandy Lane intersection at the highest point of the embankment, there is an existing path of travel across the tracks in the 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. Two design options for maintaining and improving this existing path of travel were considered for this location: 1) Maintaining existing grades and providing ADA compliant ramps, landings, and retaining walls and 2) Lowering the embankment and providing direct access across the tracks. In the first option, the tracks would be encased in concrete due to its parallel alignment with the tracks. In the second option, 123 feet of track would be removed, and 165 feet of track would be relocated to areas where track is currently missing. These design options were presented to the neighborhood at a focus meeting on June 1, 2017 for discussion and feedback. The neighborhood (specifically the people who would be using this portion of the transportation facility on a daily basis) preferred design option 2 as it provided the most direct path of travel. The associated renderings and meeting recap are posted on the City's website at http://www.cityofsacramento.org/delriotrail.

Response 7L:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 7M:

The Project would not reduce the physical integrity of the historical resource to the degree that it would no longer convey its significance and would no longer be eligible for listing in the National or California Registers. The property would retain sufficient integrity to remain eligible for listing after the Project is complete. This is the threshold for a significant impact under CEQA. Some change can be considered a "less than significant impact" under CEQA, especially if that change complies with the Secretary of the Interior's Standards. As a result, the Project would comply with the SOI standards and not have a significant impact on the historical resource as defined by CEQA.

Response 7N:

Abandonment of the Del Rio Road crossing would require the City to update the General Plan Mobility Element and could result in substantial traffic circulation related impacts to the community that uses that roadway. Based on the results of the crossing analysis, the proposed modifications at this intersection provide the safety measures needed to accommodate the project without closing adjacent roadways.

Response 7O:

Traffic control would be implemented at all crossings, including Del Rio Road, for cyclist and pedestrian safety. A Technical Memorandum was prepared by Y & C Transportation to summarize the analysis and recommendation for appropriate crossing treatments at each intersection within the project area. This study has been included in Appendix J and is available on the City website for review at <u>http://www.cityofsacramento.org/delriotrail</u>.

The project description has been updated in Section 1.0 to reflect implementation of all traffic control components of the project.

Response 7P:

South of the Del Rio Road/27th Avenue/Normandy Lane intersection at the highest point of the embankment, there is an existing path of travel across the tracks in the 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. Two design options for maintaining and improving this existing path of travel were considered for this location: 1) Maintaining existing grades and providing ADA compliant ramps, landings, and retaining walls and 2) Lowering the embankment and providing direct access across the tracks. In the first option, the tracks would be encased in concrete due to its parallel alignment with the tracks. In the second option, 123 feet of track would be removed, and 165 feet of track would be relocated to areas where track is currently missing. These design options were presented to the neighborhood at a focus meeting on June 1, 2017 for discussion and feedback. The neighborhood (specifically the people who would be using this portion of the transportation facility on a daily basis) preferred design option 2 as it provided the most direct path of travel. The associated renderings and meeting recap are posted on the City's website at http://www.cityofsacramento.org/delriotrail.

Response 7Q:

South of the Del Rio Road/27th Avenue/Normandy Lane intersection at the highest point of the embankment, there is an existing path of travel across the tracks in the 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. Two design options for maintaining and improving this existing path of travel were considered for this location: 1) Maintaining existing grades and providing ADA compliant ramps, landings, and retaining walls and 2) Lowering the embankment and providing direct access across the tracks. In the first option, the tracks would be encased in concrete due to its parallel alignment with the tracks. In the second option, 123 feet of track would be removed, and 165 feet of track would be relocated to areas where track is currently missing. These design options were presented to the neighborhood at a focus meeting on June 1, 2017 for discussion and feedback. The neighborhood (specifically the people who would be using this portion of the

transportation facility on a daily basis) preferred design option 2 as it provided the most direct path of travel. The associated renderings and meeting recap are posted on the City's website at:

http://www.cityofsacramento.org/delriotrail.

The proposed project retains approximately 98% of the historic resource. The impact of this option was analyzed and discussed in the Finding of No Adverse Effect Report which was approved by the City as the Lead Agency for CEQA.

Response 7R:

This change is analyzed in the EIR under the Secretary of the Interior's Standards for Rehabilitation, Standards 5 and 10 based on the recommendations provided in the Finding of No Adverse Effects Report prepared for the project. The Rehabilitation Standards allow for reasonable change to implement a new use. Retaining every character-defining feature of a historic property is not required for compliance. Changes that improve safety and accessibility while preserving the integrity of the historic property overall are reasonable and permissible. This is similar to modifying one entrance to a historic building to permit ADA access or modifying the non-code-compliant handrails of a historic stair. Doing so in a sensitive manner does not destroy a property's historic integrity; it ensures that everyone can enjoy it. Correcting the unsafe and inaccessible condition in this one particular intersection will not reduce the integrity of the historic property as a whole to the degree that it is not eligible for the National Register. The majority of the character-defining features will be preserved and maintained even with the alteration in this one location which is necessary to meet the project goals. Large segments of elevated embankment, in fact the majority along the segment, will remain.

Response 7S:

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 rail corridor. This 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 from 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.

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 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, 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.

Response 7T:

Use or historical purpose are not protected by the Standards. The majority of the property's features that convey its significance will remain. The ability of a historic property to convey its historic significance is not inextricably tied to its use. The historic property may no longer function as a railroad line, but its original use will remain evident and it will retain sufficient integrity to remain eligible for designation. This approach complies with the Standards.

Response 7U:

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.

Response 7V:

Where it is necessary for the trail to change alignment and cross the tracks, either to stay within the right of way, to reduce approach speed at intersections, or to maintain access connections to adjacent facilities, every reasonable effort was made to create perpendicular crossings. Where this was not feasible, skewed crossings were included in the project design for the following reasons:

Trail crossings of vehicular roadways are desired to be at a perpendicular angle to the roadway to provide the shortest crossing distance. This removes the pedestrians/bicyclists from the roadway in the shortest amount of time and reduces traffic wait times. Aligning the trail perpendicular to the roadway at Sutterville Road, while staying within the right of way, causes the trail to cross the tracks at a skewed angle.

In some locations the Del Rio Trail parallels the tracks and, due to space constraints, the distance between the path and the rail is small. Providing perpendicular crossings at these locations would

require small radius, reversing curves that would be considered an unsafe design, and would encourage off-tracking and cut throughs.

Flangeways are openings placed parallel to the rail to permit the passage of wheel flanges. Since the rail line was officially abandoned in 1978 by Southern Pacific Transportation Company, the introduction of wheel flanges is not consistent with the purpose and need of the project. Further, the rails are covered in asphalt at most of the roadway crossings in the project area. The project proposes to uncover the rail lines and encase them in concrete so the historic resource can be seen and appreciated. This encasement was evaluated in the Finding of No Adverse Effect Report and was not found to be detrimental to the integrity of the rails.

Response 7W:

The bridge in its current condition is a safety concern because its south abutment has been burned, there are large gaps between the ties, and there are no railings on the bridge. The project proposes to remove the unsafe structure and utilize this same crossing location for the trail because it provides the shortest crossing distance of the channel and the smallest construction footprint. The new bridge design will be reviewed by an Architectural Historian to ensure that it is in compliance with the Secretary of Interior Standards for Rehabilitation of a Historic Resource.

Comment 8: William Burg, Preservation Sacramento (January 2, 2019)



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

January 2, 2019

Submitted via email

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

Re: Draft Environmental Impact Report for the Del Rio Trail Project

The Board of Directors of Preservation Sacramento wishes to provide comment regarding this Environmental Impact Report (EIR). The project has the potential to affect an identified historic resource, specifically the Walnut Grove Branch of the Southern Pacific Railroad, also known as the Southern Pacific Railroad. This property was determined eligible for listing in the National Register of Historic Places as a result of environmental review occurring in 1991 (Army Corps of Engineers evaluation performed by PAR Environmental Services.) This determination was re-verified in 2007 by the Army Corps of Engineers during a subsequent process. Thus, the effects of this project on an identified historic resource should be considered in the evaluation.

As written, the EIR recognizes that the Sacramento Southern Railroad is a historic resource, and as presented, the project retains 98% of the existing tracks, with limited removal and relocation of tracks. Use of decomposed granite, rather than concrete, appears to be a suitable treatment to convert right of way to walking paths without unduly compromising or concealing the historic resource, or creating the impression of active rails. Decorative planting should not be located in between the rails or in the immediate right of way in order to limit potential damage to the ties and rails.

The Draft Environmental Impact Report as written appears to reflect the projected effects of the Del Rio Trail on an identified historic resource, with limited impacts to the Sacramento Southern right of way. We strongly encourage the City of Sacramento to list the Sacramento Southern right-of-way as a City of Sacramento historic district in order to aid in the recognition, interpretation and preservation of this historic resource.

Sincerely,

William Burg, President, Preservation Sacramento Board of Directors

Response 8:

Thank you for your comments on the environmental document. The City will take potential damage to the ties and rails into consideration when determining the location of decorative plantings for the proposed project.

Section 2.4 of the EIR states: "In certain areas of the Project alignment, park-like features such as drought-tolerant native landscaping and benches will be introduced among the existing tracks and rails in a manner that does not disturb the historic fabric."

The City may consider listing the Walnut Grove Branch Line of the Southern Pacific Railroad right-of-way as a historic district in the future to continue to aid in the recognition, interpretation, and preservation of this historic resource; however, the existing linear resource incorporates all contributing elements as part of its historic resource listing. Updating the historic resources listing from a linear resource to a historic district would not further protect any of the elements of the railroad, as all these elements are currently considered part of the historic resource.

Comment 9: Brian Ebbert, South Land Park Neighborhood Association (January 2, 2019)



January 2, 2019

Via email to: tbuford@cityofsacramento.org

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

Re: Draft EIR for the Del Rio Trail Project

Dear Mr. Buford:

The South Land Park Neighborhood Association is a nonprofit organization representing an area of South Sacramento that is home to over 14,000 residents. Over 90% of the Del Rio Trail project will run through the heart of our association boundaries. We remain in strong support of the City's project and the Draft Environmental Impact Report.

The Draft EIR shows that the project team conducted significant outreach to residents, neighborhood associations, schools, businesses, state and local agencies, utilities, and historic preservation groups. We appreciate this transparent and inclusive approach to planning. Project planners held numerous community meetings and kept stakeholders informed of project timelines and resident input opportunities. As a result of this extensive outreach, the project has gained the support of virtually every local and state elected official in the project area as well as every nearby neighborhood association.

We have never seen an issue that so intensely galvanizes our neighborhood than the fate of this abandoned rail corridor. South Land Park residents have rejected NIMBY'ism by embracing this trail project. We are aware that a few excursion train advocates want the trail project to be re-designed around the potential for future train traffic. This "trail with rail" concept should be rejected. The effort to re-design the trail to accommodate train traffic is a direct contravention of the lawful decision made recently by the State of California. In 2014, the State Parks and Recreation Commission adopted a 20-year General Plan and EIR that specifically removed this section of abandoned tracks from its future excursion train plans.

p.2/ SLPNA Del Rio Trail Draft EIR



Sacramento residents remain strongly opposed to operating trains on this corridor because it would do little for historical preservation, and would instead cause significant negative impacts to the South Sacramento region, including air and noise pollution, ground vibration, and significant deforestation of the greenbelt. Moreover, redesigning the project into a "trail with rail" would force bicyclists and pedestrians to unsafely mix and squeeze onto a narrow path to allow ample space for huge locomotives. The Del Rio Trail will be embedded close to schools, homes, and businesses, and will therefore have a high proportion of pedestrians and children using the trail. This is why separate walking and biking paths is paramount to a safe design. Simply put, making design decisions based on train traffic "viability" is wholly incompatible with the utility and safety of the trail.

On behalf of our Board of Directors, I attest that the South Land Park Neighborhood Association supports this environmentally friendly, active transportation project, which will get people out of their cars and onto a community trail.

Sincerely,

Brian Ebbert President of the SLPNA Board

cc: Joe Flores, SLPNA Vice President Nita Barve, SLPNA Secretary

Response 9A:

Thank you for your comment. The City appreciates your support of the proposed Del Rio Trail project. Based on public comment, and in an effort to further minimize environmental impacts to the historic rail, the proposed Build Alternative in the EIR has been revised to remove the separate walking trail. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail. There are no current plans for active rail use in the Project corridor.

Comment 10: Nicole Goi, Sacramento Municipal Utility District (January 3, 2019)

Powering forward. Together.

Sent Via E-Mail

January 3, 2019

Tom Buford City of Sacramento 300 Richards Blvd., 3rd Fl. Sacramento, CA 95811 tbuford@cityofsacramento.org

Subject: Del Rio Trail Project / Draft EIR / K15165100

Dear Mr. Buford:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Del Rio Trail Project (Project, SCH K15165100). SMUD is the primary energy provider for Sacramento County and the proposed Project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed Project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the Project DEIR will acknowledge any Project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - <u>https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services</u>
 - <u>https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way</u>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
- SMUD infrastructure related to the potential relocation or removal of existing SMUD facilities on or adjacent to the subject property.
- SMUD easements or public utility easements on or adjacent to the subject property. The Project Lead Agency shall provide any necessary easements and or public utility easements.

More specifically, SMUD would like to have the following details related to the electrical infrastructure incorporated into the project description:

This project will partially be constructed within SMUD's 21kV territory. SMUD 21kV overhead infrastructure runs parallel to the proposed project and shall remain unaltered. following is a list of areas that must be maintained:

- Existing 69kV and 12kV overhead route crossing Fruitridge Rd and the proposed project site.
- Existing 12kV underground crossing 43rd Ave /Blair Ave and the proposed project site.
- Existing 12kV underground north of Florin Rd crossing the proposed project site.
- · Existing 12kV overhead route along Florin Rd adjacent to the proposed project site.
- Existing 12kV overhead and underground routes crossing north and south of Pocket Rd/Meadowview Rd and the proposed project site.
- SMUD 12kV and 69kV overhead and underground infrastructures running parallel to the proposed project site.

If the project requires that any of the above-mentioned locations need be relocated as a part of this project, then these activities should be included as part of the project description. The Applicant shall be responsible for maintaining all Cal OSHA and State of California Public Utilities Commission General Order No. 95 safety clearances during construction and upon building completion. If the required clearances cannot be maintained, the Applicant shall be responsible for the cost of relocation.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this DEIR. If you have any questions regarding this letter, please contact SMUD's Environmental Management Specialist, Rob Ferrera, at <u>rob.ferrera@smud.org</u> or 916.732.6676.

Sincerely,

nicole Hon

Nicole Goi Regional & Local Government Affairs Sacramento Municipal Utility District 6301 S Street, Mail Stop A313 Sacramento, CA 95817 <u>nicole.goi@smud.org</u>

Cc: Rob Ferrera

Response 10:

Thank you for your comment. Utility relocations are anticipated to occur where the trail conflicts with existing utilities, including electric, gas, telephone, communications, and drainage facilities. The City will coordinate with SMUD regarding relocations of existing utilities under SMUD's jurisdiction prior to construction.

Comment 11: Lisa Ann L. Mangat, Department of Parks and Recreation



State of California • Natural Resources Agency DEPARTMENT OF PARKS AND RECREATION Edmund G. Brown Jr., Governor

Lisa Ann L. Mangat, Director

January 3, 2019

The Honorable Darrell Steinberg Mayor, City of Sacramento City Hall 915 I Street, 5th Floor Sacramento, CA 95814

Re: City of Sacramento - Del Rio Trail Project

Dear Mayor Steinberg:

Thank you to you and your staff for the considerable work that you have put into the proposed Del Rio Trail project (Project) in the City of Sacramento (City). I would also like to thank you for considering the protection and preservation of the rails and historic railway corridor in the most recent Draft Environmental Impact Report for the Project.

The Project proposes to construct approximately 4.8 miles of Class 1 multi-use trail along the railway corridor west of Freeport Boulevard from south of Meadowyjew Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road.

The Department of Parks and Recreation (DPR) holds the right-of-way on portions of property including the railway right-of-way just south of South Land Park Drive north to iust before the I-5 railroad bridge and the railway right-of-way adjacent to Freeport Blvd south of I-5 considered as part of the Project. DPR has an established process regarding real property permits and easements and will be reaching out to City staff after the EIR is certified. DPR anticipates that the goals of the City and DPR with regard to the Project will be compatible, including the development of a safe and efficient transportation and recreation trail that protects the historic railway corridor.

Again, thank you for your continued partnership on this important project. We look forward to future discussions with the City regarding the Project after the EIR is certified.

Sincerely,

lisa linn L. Mangal

Lisa Ann L. Mangat Director

Cc: Tom Buford, Principal Planner, City of Sacramento Community Development Department

John Fraser, District Superintendent, Capital District, CA Department of Parks and Recreation

Response 11:

Thank you for your comment and your support of the Del Rio Trail project. The City will coordinate with the Department of Parks and Recreation regarding right of way transfer after the Final EIR is adopted by the City of Sacramento.

Comment 12: Osha Meserve, Soluri Meserve Law Corporation (January 14, 2019)



tel: 916.455.7300 - fax: 916.244.7300 510 8th Street - Sacramento, CA 95814

January 14, 2019

SENT VIA EMAIL (tbuford@cityofsacramento.org)

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

RE: Comments on Del Rio Trail Project Draft EIR

Dear Mr. Buford:

These comments on the Draft Environmental Impact Report ("DEIR") for the Del Rio Trail ("project") are submitted on behalf of the Sacramento Rail Preservation Action Group ("Rail Group") and its members. The Rail Group supports the creation of a pedestrian and bicycle trail that shares the existing Walnut Grove Branch Line ("WGBL")/Sacramento Southern Railroad right-of-way. The WGBL Railroad extends approximately 33 miles in a generally southerly direction from Old Sacramento to the town of Isleton in the Sacramento River Delta. As the U.S. Army Corps of Engineers ("USACE") found in 1991, the

route still retains a remarkable degree of integrity of location, setting, design, workmanship and feeling. After its abandonment by Southern Pacific in 1978 it was bought by the State, who retained the rails, ties, trestles and other features in place with little or no change. As a result, the system is intact along most of its length, with the exception of road crossings.

(USACE, National Register of Historic Places Significance Evaluation of Walnut Grove Branch Line Railroad (1991), p. 13.)¹ As a result, the WGBL was found eligible for listing in the National Register of Historic Places under criteria (a) and (c) at the local

¹ The National Register of Historic Places Significance Evaluation of Walnut Grove Branch Line Railroad (1991) was previously provided to the City with comments letter on the Notice of Preparation. (See DEIR, App. C, PDF pp. 57-61, 66.)

Tom Buford, City of Sacramento January 14, 2019 Page 2 of 21

level of significance. (*Ibid*; see also USACE, Walnut Grove Branch Railroad National Register Nomination Final Report (1992), pp. 4-15.)²

As currently proposed, the Del Rio Trail would permanently remove large portions of the historic WGBL Railroad, rather than accommodating a shared rails with trails right of way. The project would cover several miles of the track with concrete and decomposed granite or other unidentified materials, as well as permanently alter the grade in some locations. These actions would interfere with the long-planned extension of the existing excursion service by California State Parks and the California State Railroad Museum along the Sacramento Southern Railroad; this planned extension requires use of the existing tracks in the Del Rio right of way to move equipment intermittently to the excursion train depot at the Pocket/Meadowview Road intersection from which excursion trains could depart to Hood/the Delta.

The project's proposed changes to the WGBL Railroad would permanently sever the WGBL and interfere with the ability of California State Parks to eventually connect and extend its active excursion line that commences in Old Sacramento to southern portions of the WGBL. The DEIR fails to adequately analyze and mitigate the environmental impacts of the project, including the permanent destruction of large portions of the WGBL tracks. As a result of its deficiencies, a new EIR must be prepared by the City and circulated for public review.

I. OVERVIEW OF COMMENTS ON DEIR

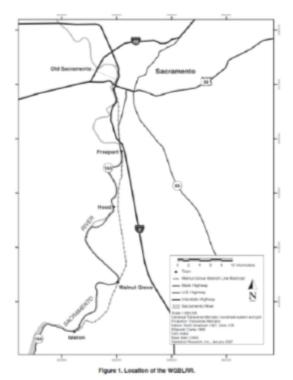
The following bullet points summarize several key Rail Group comments on the DEIR, which are described in more detail below:

 The geographic scope of the analysis in the DEIR is improperly truncated. The WGBL Railroad extends approximately 33 miles in a generally southerly direction from Old Sacramento to the town of Isleton in the Sacramento River Delta. The project would sever the connectivity of the entire line, not just in the project area identified in the DEIR; the effect of the project on the entire WGBL must be considered.

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² The USACE Walnut Grove Branch National Register Nomination Final Report (1992) was previously provided to the City with one or more comment letters on the Notice of Preparation. (See DEIR, App. C, PDF pp. 57-61, 66.)

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- The DEIR fails to include adequate information regarding the cultural and historic setting for the project. Current uses of the Sacramento Southern Railway are not recognized, such as the California State Railroad Museum's excursion train on part of the historic Southern Pacific Walnut Grove branch line, running primarily north-south along the east bank of the Sacramento River. Moreover, the DEIR ignores numerous planning and review documents regarding the Sacramento region's rich rail resources and history.
- The DEIR fails to consider the project's effects on the previously planned and analyzed expansion of the current excursion train service contemplated in the 2014 Old Sacramento General Plan and EIR, between Old Sacramento and Miller Park to the Sacramento Zoo.
- The DEIR fails to consider the project's effects on the planned addition of a second excursion train line within State Park-owned right-of-way from the Pocket-Meadowview area to the historic Delta town of Hood.
- The DEIR fails to recognize other associated impacts that would result from severance of the WGBL, such as impacts on aesthetic, recreational, biological and

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> agricultural resources, as well impacts on hazards, air quality and transportation, along with resulting negative economic consequences.

- The DEIR's significance threshold for cultural and historic impacts improperly focuses on federal standards to the exclusion of other applicable standards under the California Environmental Quality Act (Pub. Resources Code, §§ 21000 et seq. ["CEQA"]).
- The DEIR improperly concludes that the project's impacts on historical resources are less than significant after mitigation, and fails to include adequate mitigation to lessen the impact to a less than significant level.
- Due to the DEIR's erroneous conclusion that the project would not have significant impact on historical resources, the DEIR fails to examine alternatives that would lessen the significance of the project's impact on historic resources.
- The DEIR's conclusion that destruction of the historic tracks is necessary in various locations for safety reasons are not supported.

II. DETAILED COMMENTS ON DEIR

A. The Project Description Is Incomplete

The Rail Group believes that the project description has unnecessarily foreclosed alternative approaches to the project that would reduce or avoid significant environmental impacts. The inclusion of the unpaved walking trail and the removal or repurposing of existing rail roads are not necessary elements to meet the stated project objectives to "complete the planned connection between the Sacramento River Parkway and the Freeport Shores Bikeway," "[c]onnect logical origins and destinations proximate to the trail alignment by improving pedestrian and bicycle access" and "[p]rovide an American's with Disabilities Act (ADA)-compliant, active transportation connection to adjacent communities[.]" (DEIR, p. i.)

The DEIR does not substantiate the need for the proposed walking trail separate from the Class I multi-use trail, nor why removal of the track is necessary for "safety" or ADA compliance. (See DEIR, pp. i, 143, 293.) The Class I multi-use trail specifically allows for pedestrian use in its design with unpaved shoulders flanking both sides of the bike trail. (See DEIR, pp. i, xxiv, 1, 293.) The highly successful American River Bike Trail in the County of Sacramento demonstrates that a Class I trail can sufficiently serve both bicycles and pedestrians. Other projects across the state also demonstrate a Class I, ADA-accessible trail along an active railroad is feasible. (See <u>Exhibit 1</u>, 2010 Arcata Rails with Trail Project Initial Study and Mitigated Negative Declaration ("Rails with Trail MND"), pp. 1 [project involved "Class I, ADA accessible" multi-use trail], 6 [project objectives include "full consideration of existing and future highway and rail uses"].) The DEIR also does not address the safety concerns raised by directing

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pedestrians to walk on a train track, which is a dangerous practice and should not be encouraged.

Moreover, removal of WGBL rail for purported safety reasons is not supported in the DEIR. As described on pages 8 and 20 of the California State Railroad Museum Foundation's ("CSRMF") January 3, 2019 DEIR comment letter, rubber inserts can be placed to preserve future use of the rails while also facilitating easier crossing. The claim that removal is necessary to meet ADA requirements is also not supported in the DEIR. According to the same CSRMF January 3, 2019 letter, a consultant demonstrated that ADA compliance could be achieved without removing rails or lowering the grade of the railway path. (CSRMF, January 3, 2019 Comment Letter, p. 5.)

The DEIR fails to include adequate detail regarding the plan to place decomposed granite or other fill on top of the WGBL tracks as a means to create a separate walking trail from the proposed bike path. The DEIR does not disclose the total mileage of planned filling of tracks or describe where the materials will be obtained, though the figures indicate that about half of the 4. mile project segment would be filled. (See DEIR, Figures 3, pages 1-10 [Preserve Train Tracks Within Walking Path].) Without such information, it is impossible to analyze the environmental effects of this project component.

The project's objectives and purposes can be achieved while avoiding the potentially significant impacts discussed in this and other comment letters. 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.

B. Land Use Analysis Is Inadequate

The DEIR Land Use and Planning section is deficient for failing to disclose all applicable land use plans and failing to analyze all the project's land use inconsistencies. The DEIR does not disclose the existence of numerous land use planning documents that pertain to the area that would be impacted by the project, including: the 1991 Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood ("1991 FEIR"), the 2014 Old Sacramento General Plan and the Final EIR ("2014 General Plan and FEIR")³ or the California State Railroad Museum Strategic Plan 2017-2022 ("2017

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³ The 2014 Old Sacramento General Plan and Final EIR was provided was previously provided to the City with one or more comment letters on the Notice of Preparation. (See DEIR, App. C, PDF p. 66.)

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Strategic Plan").⁴ Each of these documents are relevant because they account for future use of the WGBL as part of the excursion train line from Old Sacramento to Hood. (See <u>Exhibit 2</u>, 1991 FEIR, p. 1 ["The principal objective of the proposed project is to allow . . . public steam excursion train trips that would go between Old Sacramento and the Hood/Freeport area[.]"]; 2014 General Plan and FEIR, pp. 1 [resolution overriding potentially significant impacts arising from excursion line "between Pocket/Meadowview Station and Hood"], 4-20 to 4-22 [excursion line "would host wildlife viewing and other themed excursions, with food service opportunities"], 5-i [addressing noise impacts from "operating excursion line #2"]; 2017 Strategic Plan, p. 81 [affirming "the desirability of the Zoo and Hood extensions, their value . . . business implications, and how they should be prioritized"].) These land use documents must be disclosed and analyzed in the DEIR.

The DEIR fails to recognize that the project has the "[p]otential to conflict with applicable land use plan[s], polic[ies] or regulation[s.]" (DEIR, p. 209.) The DEIR selectively addresses Sacramento 2035 General Plan policies and goals, while ignoring applicable historical and cultural resource policies. For example, Sacramento General Plan Policy HCR 2.1.12 requires the promotion of contextual features related to historic resources, and HCR 2.1.15 requires the City only consider demolition of historic resources as a last resort. (2035 General Plan, Historic and Cultural Resources, p. 2-139.) The project is inconsistent with both policies because it would remove portions of the WBGL and alter the Railroad's contextual features. These potentially significant conflicts must be disclosed, evaluated and mitigated in the DEIR.

C. The Project's Cultural Resources Impacts are Significant

1. DEIR Impermissibly Truncates Description of Cultural Resources Environmental Setting and Geographic Scope

An EIR must describe "the physical environmental conditions in the vicinity of the project . . . from both a local and regional perspective." (Cal. Code Regs., tit. 14 ["CEQA Guidelines"], §15125, subd. (a).) An EIR should place special emphasis on impacted resources that are rare or unique to the region. (CEQA Guidelines, § 15125, subd. (c).)

The DEIR fails to provide adequate information for the project's cultural and historic setting, and impermissibly limiting the scope of the project impact analysis. The core flaw with the DEIR is the failure to include and consider the entirety of the WGBL,

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⁴ An excerpt of the California State Railroad Museum Strategic Plan 2017-2022 was provided was previously provided to the City with one or more comments letter on the Notice of Preparation. (See DEIR, App. C, PDF p. 66.)

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which extends well beyond the "Project Area Limits" ("PAL") identified in the DEIR. (DEIR, p. 113.) From this failure, numerous technical and legal issues arise which undermine the DEIR's purpose as an informational document. (CEQA Guidelines, § 15125, subd. (c) [knowledge of the project setting is "critical to the assessment of environmental impacts"].)

The PAL purports to be "the area of direct and indirect effects[.]" (DEIR, p. 113.) The DEIR recognizes that the 4.8-mile section of WGBL in the project area is only a "portion of the larger resource." (DEIR, p. 138.) Yet, the PAL ignores the entirety of the project's impacts on the entire length of the WGBL. By limiting project-level analysis of impacts to the WGBL to the "immediate project vicinity, the DEIR's analysis is improperly truncated.

The entire WGBL is an historic resource under CEQA. (See League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland (1997) 52 Cal.App.4th 896, 906 [a resource listed on the California Register of Historical Resources "must in all cases be granted status as [an] historical resource[]" for purposes of CEQA] (League for Protection).) The DEIR's environmental setting must account for a "local and regional perspective" and not myopically limit the extent of review. (CEQA Guidelines, § 15125, subd. (a).) As a rail line, the WBGL is a linear feature not unlike a stream. Impacting or severing one portion of such a resource necessarily would cause impacts farther down the line. Yet the DEIR treats the 4.8-mile section identified in the PAL as a severable unit. This treatment is impermissible, and directly contradicts the DEIR's description of the geographic scope of cultural resources in its analysis of cumulative cultural impacts. (DEIR, p. 308.) The DEIR must include and analyze the entire, presently intact WGBL in its PAL in order to facilitate adequate environmental review and mitigation of impacts to this cultural resource. (CEQA Guidelines, §15125, subd. (c).)

The DEIR inappropriately refers to the WGBL as "abandoned" (DEIR, p. 143) or relies on previous damage done to the railroad to justify further alterations (DEIR, p. 141, 147). The existing damage to the WGBL without the project was characterized as follows in 2017 by the city's own consultant:

The recorded segment still retains sufficient integrity of setting, design, workmanship, feeling, and association. While the integrity of materials and location have been somewhat impacted by alterations such as improvements at intersections and slight changes to the alignment following the completion of I-5, respectively, these changes comprise a small percentage of the segment, and the overall segment retains sufficient physical integrity to convey its significance.

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(DEIR, Appendix J.2, Attachment C: Determinations of Eligibility, p. 2 of 14.) The alteration and removal of WGBL rails contemplated by the project would be a significant change from the above described conditions.

Despite detailed comments and information provided to the City in the Notice of Preparation stage, the DEIR fails to recognize the current level of interest in Old Sacramento and our region's rail-related history and future. The California State Railroad Museum receives over 300,000 visitors every year and is listed as a Travelocity 5-Star attraction in the Sacramento area. The Sacramento Southern Railroad routinely has over 20,000 riders in the Spring and Summer. The Polar Express Christmas trains have another 24,000 riders, with tickets that sell out in less than a week. (See <u>Exhibit 3</u>, CSRM Train Rides.) There is also a large community of volunteer rail enthusiasts, with over 500 volunteers, that are committed to helping keep Sacramento's rail history alive for generations of residents and visitors.

2. The DEIR Contains a Flawed Impact Analysis for Cultural and Historical Resources

CEQA provides a detailed process for evaluating the significance of impacts to historical resources. CEQA Guidelines section 15064.5 subdivision (a) describes what constitutes a historic resource, and the DEIR correctly recognizes the WGBL as an historical resource. (DEIR, p. 137.) Section 15064.5 subdivision (b) in turn describes what constitutes a substantial adverse change to a historical resource. A substantial adverse change to a historical resource. A substantial adverse change to a historical resource means "demolition, destruction, relocation, or alteration such that the significance" of the resource would be impaired. (CEQA Guidelines, § 15064.5, subd. (b)(1); *League for Protection, supra*, 52 Cal.App.4th at 909.) More specifically, the significance of an historical resource is impaired when a project "demolishes or materially alters . . . those physical characteristics . . . that convey its historical significance to justify its eligibility for inclusion in the California Register of Historical Resources[.]" (CEQA Guidelines, § 15064.5, subd. (b)(2)(C).) Last, subdivision (b)(3) provides that if a project would cause significant impacts to a historical resource, implementing the Department of Interior guidelines would generally result in mitigation to a less than significant level.

While the DEIR references the CEQA Guidelines section 15064.5 definition of a significant impact to evaluate Impact CUL-1 (DEIR, p. 142), the required analysis is not included in the DEIR. The DEIR instead cites and applies federal regulations for the definition of adverse effect on a historical resource. (DEIR, pp. 142-147.) First, this approach ignores CEQA Guidelines section 15064.5, which provides the threshold for evaluating significant impacts to historic resources. The DEIR does not explain the connection between CEQA Guidelines section 15064.5 and the federal regulations

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applied in the DEIR. Second, the DEIR's analysis is largely inconsistent with 36 Code of Federal Regulations part 800.5, which are the Department of Interior's guidelines cited in CEQA Guidelines section 15054.5, subdivision (b)(3).) While it is true that consistency with these guidelines may mitigate significant impacts, the DEIR does not demonstrate any such consistency, as discussed further below. Moreover, several factual flaws in the DEIR's project impact analysis for CUL-1 further undermine the DEIR's conclusions.

The Secretary of the Interior's Standards for the Treatment of Historic Properties and the Secretary of the Interior's Standards for Rehabilitation may be implemented to mitigate a project "to a level of less than a significant impact on the historical resource." (CEQA Guidelines, § 15064.5, subd. (b)(3).) This directive from the CEQA Guidelines does not suggest use of the federal guidelines as a *de facto* framework for analysis, but as a potential means of mitigating a potentially significant impact. The DEIR's application of the federal guidelines is a tacit admission that the project would indeed significantly impact the WGBL as an historic resource. The DEIR's analysis under the Rehabilitation Standards, found in 36 Code of Federal Regulations part 68.3 and referenced by CEQA Guidelines section 15064.5, is unavailing and does not demonstrate that the project's significant impacts would be mitigated.

Section 15064.5, subdivision (b) defines a significant impact to a historical resource as demolition, destruction, relocation or alteration of the characteristics that make the resource eligible for the applicable historic listing. Similarly, 36 Code of Federal Regulations part 800.5, subdivision (a)(1) defines an adverse effect as direct or indirect alteration of the characteristic that qualify a resource for the National Register. The characteristics include location, design, setting, materials, workmanship, feeling and association. (36 C.F.R., § 800.5, subd. (a)(1).) Examples of adverse effects include damage to even "part of the [resource]," "[a]lteration . . . not consistent" with federal standards, a "[c]hange of the character of the [resource's] use or of physical features[.]" (36 C.F.R. § 800.5(a)(2).) The DEIR itself identifies the WGBL's "[1]ocation and track alignment . . . [e]levated embankment . . . [s]tandard gauge rails . . . [w]ood ties . . . [and] agricultural setting" as the features that qualify it for the National Register. (DEIR, p. 139.) The project would demolish and alter these qualifying characteristics in a significant and adverse manner. Furthermore, the project would destroy the WGBL's defining historic use, as a rail line "artery" that connects Sacramento with the Delta.

The DEIR claims that the project would only "include[] limited removal" of WGBL railroad track, while large sections of the track will be "converted" by infilling the existing track with decomposed granite ("DG") or encased in concrete. (DEIR, p. 143, 145.) These changes from the project both constitute significant impacts under CEQA and federal standards. Clearly, removal of segments of the rail line equates to destruction of the resource, even if only "2 percent" would be removed. (DEIR, p. 144.)

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However, such a characterization ignores the nature of the WGBL as a historical resource. As a railroad, the WGBL is a linear resource and the destruction of any one segment prevents current or future uses. As discussed below, there are multiple planned uses for the WGBL, and destroying any segment of the WGBL rail would prevent implementation of those uses.

Beyond the actual removal of WGBL segments, so called conversion or "repurposing" of the tracks is equally damaging. (DEIR, p. 143.) The conclusion in DEIR Appendix J.2, page 46, is unsupported that: "The conversion of portions of track into a walking path using DG, or a similar material, is a reversible, non-permanent change that will not damage the integrity of the existing historic fabric." No evidence in the DEIR or its appendices supports a determination that DG infill is "reversible." (DEIR, p. 144.) Converting the WGBL into a walking trail, even if the steel rails remain, is tantamount to material impairment and equivalent to removal. Moreover, preventing any future use of a historic railroad clearly violates Rehabilitation Standard 1, which requires preservation of a property's historic purpose. (36 C.F.R. § 68.3(b)(1); DEIR, p. 144.)

The project similarly fails the other applicable Rehabilitation Standards. The project does not avoid "the removal of historic materials or alteration of features . . . that characterize" the WGBL. (36 C.F.R. § 68.3(b)(2).) Both the removal of tracks and the filling of tracks would foreclose the historical use of the WGBL, while also undermining the historical feeling and association. The project's plan to "add conjectural features" by converting what appears to be about half of the WGBL that traverses the project area into a walking trail, thereby damaging the WGBL as a "physical record of its time, place, and use." (36 C.F.R. § 68.3(b)(3); DEIR, p. 145.) While some small segments of the WGBL railway were previously altered and/or damaged, the DEIR's characterization of the project's contemplated removal and damage to segments "not further diminishing[ing] the existing level of integrity" is unsupported. (DEIR, p. 147.)

Overall, by failing to apply the CEQA Guidelines section 15064.5 threshold of significance, and misapplying the federal Rehabilitation Standards, the DEIR violates CEQA.⁵ The removal and alteration of the WGBL significantly impairs the railroad's historical character and functionality, and conflicts with the appropriate Rehabilitation Standards, meaning that the significant impacts are not mitigated under CEQA Guidelines section 15064.5, subdivision (b)(3).

⁵ The City and other agencies also have failed to adhere to the requirements of the National Environmental Policy Act (42 U.S.C., §§ 4321 et seq. ["NEPA"]).

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3. The Project Would Interfere with Planned and Approved Excursion Train Service on the WGBL

Foreclosing future uses of the WGBL is one example of an impact ignored by the DEIR's improperly limited environmental setting and geographic scope. The DEIR fails to disclose that the project would foreclose use of the WGBL for additional excursion lines, and that such future uses were explicitly planned in previously approved planning and environmental documents. The 2014 Old Sacramento General Plan, the accompanying Final EIR, and the California State Parks and Recreation Commission resolution adopting the General Plan all contemplate use of the WGBL on portions of the existing Sacramento Southern Railway. Specifically, the 2014 General Plan and FEIR contemplated an excursion line between Pocket/Meadowview Station and Hood. (See 2014 General Plan and FEIR, pp. 1 [resolution], 4-20 to 4-22 [excursion line "would host wildlife viewing and other themed excursions, with food service opportunities"], p. 5-i [addressing noise impacts from "operating excursion line #2"].)

Previously, in 1991, an EIR was prepared and certified for a Steam Excursion Train from Old Sacramento to Hood:

The principal objective of the proposed project is to allow the Museum to offer public steam excursion train trips that would go between Old Sacramento and the Hood/Freeport area, a total distance of approximately. 17 miles each way. In contrast to the Miller Park run, which uses approximately 2.8 miles of the WGB Line, service to Hood would provide an opportunity for visitors to take a longer trip (about two hours) on a steam train from the historic urban setting of Old Sacramento south along the river into the natural/agricultural rural landscape at the edge of the Delta. This run will both increase the recreational opportunities available in Old Sacramento and offer a means of interpreting railroad history that compliments the State Railroad Museum.

(<u>Exhibit 2</u>, 1991 FEIR, p. 1.) The Steam Excursion train includes an excursion train service from Old Sacramento to Hood on the existing WBGL right of way. (<u>Exhibit 2</u>, 1991 FEIR, p. 2.)

The current excursion line is also discussed in the 2014 Old Sacramento General Plan, which uses the northern portion of the WGBL that runs north-south along the east bank of the Sacramento River between Old Sacramento and Sutterville Road. (2014 General Plan and FEIR, p. 2-59.) The Old Sacramento General Plan also specifically includes an extension of the excursion line from a Pocket/Meadowview station to Hood. (2014 General Plan and FEIR, p. 4-22.) This extension "would host wildlife viewing and

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other themed excursions, with food service opportunities including brunch or dinner. Train Line #2 could be timed to offer river boat interface, with potential service at Freeport and/or Hood." (*Ibid.*) The current California State Railroad Museum Strategic Plan 2017-2022, also includes the eventual extension of the excursion line from Pocket/Meadowview to Hood. (2017 Strategic Plan, p. 81.)

The Project would prevent any of these contemplated future uses by removing or "repurposing" what appears to be most of the WGBL within the inappropriately defined project area to serve as a walking trail. Impacts on these planned culturally-rich activities must be disclosed and analyzed in the Cultural Resources analysis and other affected resource areas.

4. Proposed Action Plan Does Not Mitigate Damage to WGBL

As a result of the DEIR's failure to consider the removal and repurposing of the WGBL Railroad or the prevention of future use of the WGBL as potentially significant impacts, the cultural impact mitigation measures are also inadequate. The Action Plan, which the DEIR alleges provides mitigation for Impact CUL-1, contains the same flaws as the DEIR. In particular, the Action Plan considers the portion of the WGBL in the project area as severable from the entirety of the WGBL Railroad. (See DEIR, Appendix J.2, Attachment D, Action Plan, p. 8.)

The Action Plan does nothing to address project impacts that would prevent the future use of WGBL an excursion line. Further, the Action Plan fails to include any measures to mitigate the project's removal or repurposing of WGBL tracks. The DEIR and the Action Plan both falsely claim that the relocation and reuse of removed track as a mitigation measure would "reduce net loss" of rail. (See DEIR, pp. 144-145; Appendix J.2, Action Plan, p. 13.) This assertion ignores the practical reality that it is not the raw amount of railroad track that matters, but the ability to actually use the WGBL as a functioning Railroad. Relocation of some removed tracks does not mitigate the impacts the project would cause by severing the integrity of the Railroad in other locations.

The Action Plan, like the DEIR, does not substantiate the need for track removal at all. Neither vague references to safety nor ADA-compliance justify removal of the tracks, and other less impactful options are available to address those issues. (CSRMF, January 3, 2019 Comment Letter, pp. 5, 8, 20.) The Action Plan also fails to adequately explain how filling in the WGBL tracks to create a walkway on top of the existing tracks is permissible under the applicable rehabilitation standards. While the tracks would retain the same height and alignment (DEIR, Appendix J.2, Action Plan, p. 17), the proposed conversion of the tracks to a walking trail precludes future use of WGBL as a part of the excursion line, and no plans or procedures are provided for removal of the

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imported fill material that would be necessary to rehabilitate the WGBL to pre-project conditions. The Action Plan also does not substantiate the claim that such a conversion is a "non-permanent, reversible alteration" to the WGBL. (*Ibid.*) Without a plan and funding to remove the fill, these changes to the WGBL must be considered permanent.

The various monitoring and treatments contained in the Action Plan do not actually mitigate the impacts to cultural resources because the DEIR ignores the WGBL as a railway in current use and with planned expanded future uses. The proposed removal and filling of WGBL tracks would destroy the integrity and utility of the WGBL Railroad, and the DEIR fails to include any mitigation to address these impacts. Impacts on this cultural and historic resource therefore remain significant.

D. The Project May Have Potentially Significant Aesthetic Impacts

"Relevant personal observations of area residents on nontechnical subjects may qualify as substantial evidence for a fair argument. (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928, 931.) "[T]he opinions of area residents, if based on direct observation, may be relevant as to aesthetic impact and may constitute substantial evidence in support of a fair argument; no special expertise is required on this topic." (*Id.* at 937.) The concerns and observations regarding the "overall degradation of the existing visual character of the [project] site" can constitute substantial evidence sufficient to raise a fair argument of aesthetic impacts. (*Ibid.*)

Here, the Rail Group and other commenters (See January 3, 2019 Letter from Paul Helman) have concerns that the Project's changes to the WGBL will negatively impact the surrounding area. The DEIR predictably downplays the railroads place on the project's aesthetic setting, dismissing the WBGL as "an abandoned railway corridor[.]" (DEIR, p. 17.) However, as an historical resource, the WBGL contributes to and is an important part of the project area's aesthetic and historical quality. Removing portions of the railroad and filling miles of WGBL tracks with decomposed granite or other materials would "[s]ubstantially damage scenic resources" and "degrade the existing visual character" of the project area. (DEIR, p. 23.) The aesthetic impacts from the project's damage to the WGBL must be disclosed and evaluated.

E. The Project May Have Potentially Significant Recreational Impacts

As discussed above, the WGBL has been planned to be used to support an excursion line from Freeport to Hood under the 2014 Old Sacramento General Plan, the 1991 Steam Excursion Train FEIR, and the California State Railroad Museum's 2017 Strategic Plan. This foreseeable future use is not disclosed in the environmental setting

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for recreational resources. Further, the project's impacts on the WGBL as a recreational resource are not disclosed or analyzed.

The removal and infill of the WGBL railroad tracks would result in "permanent displacement of [an] existing recreational facilities[.]" (DEIR, p. 249 [Impact REC-4].) Removing and making unusable segments of the WGBL would prevent any future recreational use of the railroad, such as "wildlife viewing and other themed excursions, with food service opportunities[.]" (2014 General Plan and FEIR, p. 4-22.) This potentially significant impact on the recreational values of WGBL must also be disclosed and evaluated.

F. The Project May Have Significant Impacts on Biological Resources

The DEIR indicates that 17 Valley elderberry shrubs were identified in the project's biological study area. DEIR Figure 15 shows that the Elderberry shrubs are within 100 feet of the proposed work areas. The DEIR incorrectly assumes that it is not necessary to conduct consultation with the Fish and Wildlife Service ("FWS") on Valley elderberry longhorn beetle due to the upland location of the identified shrubs. (DEIR, p. 102.) Yet, according to the FWS, "Complete avoidance (i.e., no adverse effects) may be assumed when a 100-foot (or wider) buffer is established and maintained around elderberry plants containing stems measuring 1.0 inch or greater in diameter at ground level."⁶

The DEIR also fails to adequately assess the loss of habitat associated with cutting of 59 trees and other vegetation removal for the project. (DEIR, p. 105.) While an alternative with fewer tree removals was preliminarily considered, it was summarily rejected from further consideration.

G. The Project's Hazards Impacts Are Inadequately Disclosed

The Phase I Environmental Site Assessment identifies that heavy metals may be present in the embankments and ballast, and that pesticides may have been used for weed control. (DEIR, Appendix J.3, p. 21.) Toxic chemicals are found in both the soils and water, which could injure workers and nearby sensitive receptors from soil vapor during excavation. (DEIR, Appendix J.3.) The potential risks from heavy metal and pesticide impacts identified in the Phase I necessitate preparation of a Phase II Environmental Site

Valley Elderberry Longhorn Beetle, 1999, p. 3, available at:

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⁶ Conservation Guidelines for the

https://www.fws.gov/cno/es/Recovery_Permitting/insects/valley_elderberry_longhorn_be etle/ValleyElderberryLonghornBeetle_ConservationGuidelines_19990709.pdf.

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Assessment to identify the nature and extent of the identified exposure risks. The DEIR is incomplete without this supporting data; the DEIR's Hazards analysis fails to identify or mitigate for these hazards.

In addition, soil vapor, even in shallow trenches, can concentrate and affect workers and nearby sensitive receptors. Given that the project site is immediately adjacent to documented sources of soil vapor (DEIR, Appendix J.3, p. 21), these conditions must be sampled prior to any excavation. In addition, risks from diesel particulate matter during construction should be modeled, given the adjacency of the project to sensitive receptors.

H. The DEIR Fails to Disclose the Project's Air Quality Impacts

The project includes construction activities in soils containing fine particulates as well as potential heavy metals and pesticide residues. (DEIR, Appendix J.3, p. 21.) The Air Quality analysis fails to analyze potential impacts of these hazards on sensitive receptors and workers. With respect to sensitive receptors, the DEIR appears to use an unduly limited definition of sensitive receptor. The DEIR states that "The nearest sensitive receptors in the vicinity of the Project site are residences approximately 30 feet from the trail throughout the 4.8-mile corridor" (DEIR, p. 44); and "[t]he nearest sensitive receptors in the vicinity of the Project site who could be affected by odors are residences, schools, and daycares approximately 30 feet from the proposed Project area" (DEIR, p. 45.) The DEIR does not appear to contain a complete listing of all types of sensitive receptors. (See, e.g., DEIR, p. 177.)

Appendix D of the DEIR includes an incomplete Road Construction Emissions Model summary table. No additional supporting materials, such as assumptions, and standard inputs, was included in the DEIR. The table values identify that no material would be imported or exported by the project; yet the project contemplates construction along an almost 5 mile right of way, including the importation of large quantities of fill material (DEIR, pp. 143, 145, 308). (DEIR, Appendix D.) The source of this material, the distance necessary to transport it to the project site, and return vehicle trips are not accounted for in the emissions calculations or transportation impacts analysis. Depending on the source of these construction materials, identified as possibly decomposed granite, could come from sources with serpentinite (or other harmful particles).

The Road Construction Emissions Model table in DEIR Appendix D also incorrectly indicates that there will be zero vehicle miles traveled for materials and equipment transport. As a result of these oversights, the full extent of truck traffic trips

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and resulting air emissions were not calculated for the project, and project air emissions are underestimated.

I. The Project Has Unidentified Transportation Impacts

The DEIR fails to disclose that the project, through track destruction and filling with decomposed granite, would render the WGBL Railroad unusable. The WGBL is an existing transportation corridor that supports a train excursion service that is slated for expansion in plans prepared by California State Parks. The DEIR must analyze the impacts of the project on this transportation corridor.

The DEIR also fails to disclose the volume of trucks that would be required to construct the project, including delivery of large volumes of decomposed granite and other fill materials to build the separate walking trail. Despite miles of contemplated fill to be placed in the Railway, the DEIR's Road Construction Emissions Model unreasonably assumes that *no materials would be imported or exported* to construct the project. (See, e.g., DEIR, Appendix D.) This assumption is directly contradicted by project information in the DEIR. (DEIR, pp. 153, 145, 308.) Traffic impacts from these truck trips, and their resulting transportation impacts are not properly disclosed or mitigated.

J. The DEIR Fails to Discuss the Project's Impacts on Agricultural Resources

The DEIR incorrectly fails to include any analysis of impacts on agricultural resources. (DEIR, p. 7.) In particular, the WGBL was the connection between growers in the Delta and produce markets. "The railroad served as a vital link between upper delta farms and distant markets until the mid-1930s." And "[b]y the early 1970s, trains ran three or four times a week during most of the year, primarily carrying pears, farm machinery, and chlorine. (Steam Train to Sacramento, Walnut Grove Branch Line Acquisition Feasibility Study, 1980, p. 19.)⁷

That history is still alive today in the Farm to Fork movement; the City of Sacramento painted "Farm to Fork Capitol" on its water tower in Freeport in 2017.

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⁷ Steam Train to Sacramento, Walnut Grove Branch Line Acquisition Feasibility Study, 1980, was previously provided to the City with one or more comment letters on the Notice of Preparation. (See DEIR, App. C, PDF p. 66.)

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AMERICA'S FARM-TO-FORK CAPITAL SACRAMENTO, CA

The City is surrounded by 1.5 million acres of farmland, making it the largest agricultural producer in the nation, according to the Sacramento Visitors Bureau. "No major city in America is more centrally located amid such a vast range of high-quality farms, ranches and vineyards," and the city has more than 40 farmers market and farmers can grow 365 days per year.⁸ Each September, Sacramento hosts the Farm to Fork Festival, which includes a Farm to Fork Train excursion on the WGBL. (See Exhibit 3, California State Rail Museum, Train Rides.) Attracting more than 80,000 people in 2018, the Festival helps to showcase the incredible food and agriculture of Northern California. The event also offers a full day of music, with live concerts almost every hour.⁹

The project would undermine the region's farm to fork movement and sever a physical and historical connection between Sacramento and the Delta. Particularly in the cumulative context, these impacts on the region's agricultural heritage and economy are potentially significant should have been considered.

K. The DEIR's Cumulative Impact Analysis Is Deficient

An EIR must evaluate a project's cumulative impacts if the project's incremental effects "in connection with the effects of past . . . current . . . and . . . probable future projects." (CEQA Guidelines, §15065, subd. (a)(3); Banning Ranch Conservancy v. City

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See https://www.farmtofork.com/.

See https://www.farmtofork.com/events/farmtoforkfestival/.

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of Newport Beach (2012) 211 Cal.App.4th 1209, 1228.) The purpose of cumulative impact analysis is to ensure a project is not considered in a vacuum. (Whitman v. Board of Supervisors (1979) 88 Cal.App.3d 397, 408.)

As discussed above, two separate approved projects and the California State Railroad Museum contemplate the use of the WGBL for an excursion line from Sacramento into the Delta. (See Exhibit 2, 1991 FEIR; 2014 General Plan and FEIR; 2017 Strategic Plan.) The DEIR fails to list these related projects in its cumulative impact analysis. (DEIR, pp. 300-304.) An EIR must consider all sources of related impacts. (CEQA Guidelines, § 15130, subd. (a)(1); *City of Long Beach v. Los Angeles Unified Sch. Dist.* (2009) 176 Cal.App.4th, 889, 907.) The DEIR's failure to consider these documents does not change the fact that this project would prevents the future implementation of the WGBL as an excursion line from Meadowview to Hood. The project, in combination with the related projects described in the 1991 Steam Excursion Train, 2014 Old Sacramento General Plan, and the 2017 California State Railroad Museum Strategic Plan must be analyzed in the DEIR's cumulative impact analysis.

L. The DEIR Fails to Consider Alternatives That Would Lessen Significant Impacts to the WGBL

The discussion of project alternatives is "the core of an EIR." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564; see *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 937.) A discussion of project alternatives is required even if a projects impacts would be avoided or reduced by mitigation measures. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 403; *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.3d 692, 732 (*Kings County*).) An EIR must describe a reasonable range of alternatives that could feasibly attain a project's basic objectives. (CEQA Guidelines, § 15126, subd. (d); *Kings County, supra*, 221 Cal.3d at 733.) "An EIR which does not produce adequate information regarding alternatives cannot achieve the dual purpose served by the EIR, which is to enable the reviewing agency to make an informed decision and to make the decisionmaker's reasoning accessible to the public, thereby protecting informed self-government." (*Kings County, supra*, 221 Cal.3d at 733, quoting *Laurel Heights Assn. v. Regents of University of California, supra*, 47 Cal.3d at 403.)

The DEIR Alternatives analysis states that two alternatives were considered, but rejected, Alternative 1—Reduced Tree Removal and Alternative 2—No Walking Path. (DEIR, pp. 272, 293.) The DEIR summarily rejects these alternatives from further consideration "because they failed to meet most of the basic Project objectives, were determined to be infeasible, and/or would not avoid or substantially lessen significant

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environmental impacts." (DEIR, p. 272.) Thus, the only alternatives considered in the DEIR in detail were the proposed project and the No Build Alternative.

The Preservation Society and other commenters on the Notice of Preparation requested analysis of an alternative without a separate walking trail. (See, e.g., July 9, 2018 and January 3, California State Railroad Museum Foundation letters.) The DEIR preliminarily considered, and then rejected Alternative 2—No Walking Path. According to the DEIR:

This alternative would ultimately result in the same amount of track removal as the proposed Project (approximately 2 percent) even without the proposed walking path. This alternative was rejected for further consideration and analysis because it would not avoid or substantially lessen significant environmental impacts. This alternative would ultimately result in the same amount of track removal as the proposed Project (approximately 2 percent) even without the proposed walking path. This alternative was rejected for further consideration and analysis because it would not avoid or substantially lessen significant environmental impacts.

(DEIR, p. 293.) The analysis of this alternative is incorrect and unsupported.

As discussed above, "converting" or "repurposing the Railway by filling in the tracks with decomposed granite or other materials would alter the character and prevent future uses of the Railway for planned excursion trains. Thus, it is incorrect for the DEIR to conclude that Alternative 2 would have the same impact on Cultural Resources as the proposed Project. Alternative 2 would not include filling in the tracks with decomposed granite or other materials, thus resulting in fewer miles of track removal/damage than the project. Due to the DEIR's erroneous conclusion that the project would not have a significant impact on historical resources, the DEIR fails to examine alternatives that would lessen the significance of impacts on historical resources.

The DEIR is incorrect that Alternative 2—No Walking Path would result in the same amount of track removal as the proposed Project. The DEIR wrongly assumes that the filling of track with DG does not destroy the track for use by trains.

Where other Project constraints make it necessary for the walking path to overlap with the existing track, sections of the track will be converted to a walking trail by infilling the area between the metal rails with a traversable surface such as decomposed granite (DG). Tom Buford, City of Sacramento January 14, 2019 Page 20 of 21

(See DEIR, p. 151; see also DEIR, pp. 143, 145, 308.) The claim that Alternative 2 would have similar impacts as the proposed project is false. Alternative 2 would have a significantly less harmful impact on the WGBL as a cultural resource because there would be less overall alteration and destruction of the WGBL Railroad.

Other existing projects demonstrate that a separate walkway removed from the Class I trail is not necessary, and that such a trail project can coexist with adjacent active railroads. For instance, the American River Parkway does not include an additional walkway, and the shoulders are sufficient for pedestrian use. The Arcata Rail with Trail Connectivity Project also runs a Class I trail parallel to active railroads. (See <u>Exhibit 1</u>, Rails with Trails MND, pp. 1-5.)

Moreover, the claims that safety and ADA compliance dictate the removal of some segments of the WGBL is not supported in the DEIR. As past commenters have pointed out, rubber flange fillers can be used to allow both future rail use and bike crossing. (See CSRMF, January 3, 2019 Comment Letter, pp. 8, 20.) ADA compliance is possible without removing rail as well. (See CSRMF, January 3, 2019 Comment Letter, p. 5.)

Feasible alternatives that would avoid significant impacts to the WGBL have not been properly considered. The DEIR does not substantiate the claim that Alternative 2 is not feasible, and evidence to the contrary has been introduced by the public. The alternatives analysis fails to provide a fact-based comparison between the proposed project and Alternative 2. (CEQA Guidelines, § 15126.6, subd. (d); see *Kings County*, *supra*, 221 Cal.3d at 733.)

III. CONCLUSION

The defects discussed herein (and in other comment letters) render the DEIR inadequate as an informational document. The Rail Group requests that the City revisit the project with proper respect for and accommodation of our region's rich rail history and future that is embodied in the Walnut Grove Branch Line Railroad. Doing so, in conjunction with conducting a complete analysis of the environmental effects of the Tom Buford, City of Sacramento January 14, 2019 Page 21 of 21

project as required by CEQA and NEPA, would lead to a trail <u>with</u> rail project worthy of adoption. Thank you for considering these comments and please feel free to contact my office with any questions.

Very truly yours,

SOLURI MESERVE A Law Corporation

By: Osle M. Mo

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Exhibits (Available Via Dropbox at: https://www.dropbox.com/sh/60zfjhz24r2g4gk/AAAWfaqvU0gj8p9b-kILo-tra?dl=0.)

Exhibit 1, 2010 Arcata Rails with Trail Project Initial Study and Mitigated Negative Declaration

Exhibit 2, 1991 Final EIR for the Extension of the Steam Excursion Train from Old Sacramento to Hood

Exhibit 3, California State Rail Museum, Train Rides

cc: Sacramento Rail Preservation Action Group

Response 12A:

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: <u>http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf</u>

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.

JUNE 2014

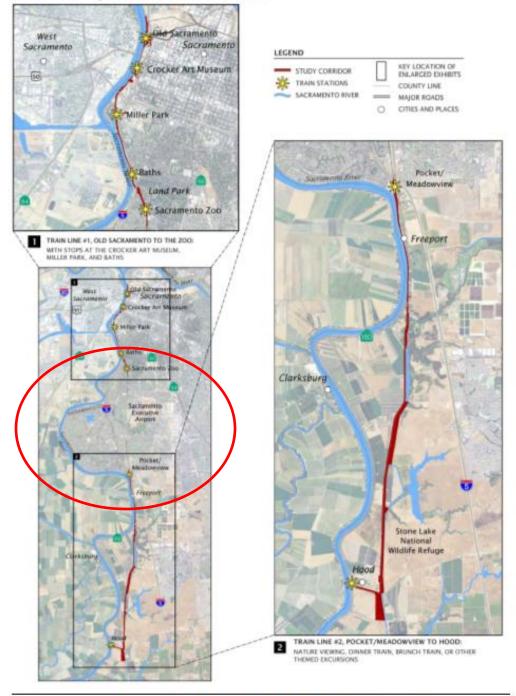


Exhibit 4-4: Proposed Excursion Train Routes

Old Sacramento State Historic Park General Plan and EIR | Page 4-21

Response 12B:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 12C:

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. Rubber is not a material that would be used to fill gaps/cracks because rubber breaks down at an accelerated pace due to the wide range of climatic conditions experienced in the Sacramento Area.

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.

The existing tracks cross an existing drainage channel south of Charlie Jensen Park via a wooden bridge structure. The bridge in its current condition is a safety concern because its south abutment has been burned, there are large gaps between the ties, and there are no railings on the bridge. The project proposes to remove this unsafe structure and utilize the same crossing location for the trail because it provides the shortest crossing distance of the channel and the smallest construction footprint.

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

Response 12D:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 12E:

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 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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 12F:

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. This 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 from 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

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

Response 12G:

The trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

The Project would not reduce the physical integrity of the historical resource to the degree that it can no longer convey its significance and is no longer eligible for listing in the National or California Registers. The property would retain sufficient integrity to remain eligible for listing even after the Project is complete. This is the threshold for a significant impact under CEQA. Some change can be considered a "less than significant impact" under CEQA, especially if that change complies with the Secretary of the Interior's Standards. As a result, the Project would comply with the SOI standards and not have a significant impact on the historical resource as defined by CEQA.

Response 12H:

The EIR analyzes the environmental setting within the proposed project boundaries where construction is proposed to occur. For the purpose of evaluating impacts to a historic resource such as the historic railroad segment, the entire resource is evaluated, and local project related impacts to the resource as a whole are also considered. This evaluation of the WGBL is included in detail in the Finding of No Adverse Effect Report prepared for the project and is summarized in this EIR. The City of Sacramento has concluded that the proposed Del Rio Trail project would have a less than significant impact on the historic WGBL segment in the project area, as well as to the historic resource in its entirety. Outside of the historic resource evaluation, no other environmental analysis is warranted for other segments of the WGBL where no construction would occur, therefore, they have not been included in the PAL.

Response 12I:

In 1977, the Interstate Commerce Commission granted Southern Pacific Transportation Company, through Certificate and Order AB-12 Sub No. 40, the authority to abandon a 13.86 mile stretch of railroad from Sacramento to Hood, which includes the segment within the Del Rio Trail project area. On June 5, 1979, in a letter to the Interstate Commerce Commission, Southern Pacific Transportation Company provided written communication that the abandonment of the line as authorized by the Commission had been completed.

Response 12J:

The purpose of this project is to provide a multi-use trail between the Sacramento River Parkway and the Freeport Shores Bikeway in accordance with the City of Sacramento's Bikeway Master

Plan. The focus of this EIR is to identify potential impacts to the environment as a result of construction of the trail.

With that said, 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.

As noted in Response 5E, the trail project does not preclude future expansion of rail service.

Response 12K:

Built environment historic resources (such as a railroad) are typically evaluated by determining if a proposed project would reduce the physical integrity of the historical resource to the degree that it could no longer convey its historic significance. Under NEPA the threshold of significance is: Would the resource continue to be eligible for inclusion on the National Register of Historic Places, and likewise for CEQA, would the resource continue to be eligible for inclusion on the California Register of Historic Places. A Finding of No Adverse Effect Report was prepared for the project that includes an evaluation of the proposed project's potential to impact the historic railroad and, under CEQA, concluded that there would be no significant impact with mitigation incorporated. The property would retain sufficient integrity to remain eligible for listing on the California Register of Historic Places after the project is complete. The appropriate mitigation in this case is compliance with the Secretary of Interior's Standards which allows the City of Sacramento to make this CEQA determination.

Response 12L:

Use or historical purpose are not protected by the Standards. The majority of the property's features that convey its significance will remain. The ability of a historic property to convey its historic significance is not inextricably tied to its use. The historic property may no longer function as a railroad line, but its original use will certainly remain evident and it will retain sufficient integrity to remain eligible for designation. This approach complies with the Standards.

Response 12M:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 12N:

Pursuant to the approved Old Sacramento State Historic Park General Plan and FEIR (June 2014, SCH: 20100092068), the segment of the planned extension of the excursion rail was removed between Sutterville Road and Pocket Road/Meadowview Road (Chapter 4, Page 4-21).

Additionally, 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 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 12O:

Use or historical purpose are not protected by the Standards. The majority of the property's features that convey its significance will remain. The ability of a historic property to convey its historic significance is not inextricably tied to its use. The property will retain sufficient physical integrity to convey its original use as railroad line, even if it is no longer used as a railroad line. The historic property may no longer function as a railroad line, but its original use will certainly remain evident and it will retain sufficient integrity to remain eligible for designation. This approach complies with the Standards.

Response 12P:

The EIR evaluated potential impacts to aesthetics and visual quality. The discussion focused on removal of trees and other large vegetation as those changes would have the greatest potential to be observed by viewer groups. Changes to the abandoned railroad facility were considered to not be a significant change to the overall aesthetics of the corridor when comparing the existing condition with the proposed future condition. This included the minor segments of tracks which would be removed for safety reasons, as well as the visual changes that would occur by putting the decomposed granite walking path between the rails in certain parts of the project.

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.

Response 12Q:

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); therefore, the abandoned rail is not considered

an existing recreational facility 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 12R:

The above referenced 1999 Conservation Guidelines for the Valley Elderberry Longhorn Beetle (VELB) were updated by the U.S. Fish and Wildlife Service in May 2017:

https://www.fws.gov/sacramento/documents/VELB_Framework.pdf

Based on the 2017 *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle*, adverse impacts to elderberry shrubs can occur either at a habitat scale or at an individual shrub scale. If elderberry shrubs are found on or within 50 meters (165 feet) of the project site, a habitat assessment is conducted to determine if the project area is in riparian or non-riparian habitat. If the project site is non-riparian and contains elderberry shrubs, exit hole surveys are used to evaluate the site for occupancy. Exit hole surveys are not essential in riparian areas but may be conducted in order to assess the level and significance of adverse effects. All shrubs are also evaluated for their distance from riparian habitats. Isolated, non-riparian elderberry clumps are less likely to be occupied or become colonized by VELB and those beyond 800 meters (2,526 feet) from the nearest elderberry clump become increasingly less likely to be occupied. Lastly, a project site is evaluated on a shrub's proximity to historic riparian corridors because isolated elderberry clumps that were part of a historic riparian community may still support VELB.

Based on USFWS Critical Habitat maps, the project area is not located within designated Critical Habitat for VELB; however, the project is within the current range of the species. Focused elderberry surveys and habitat assessments, conducted by Dokken Engineering biologists on May 12th and May 17th, observed 17 elderberry shrubs within the Biological Study Area (BSA). Utilizing the CDFW A Guide to Wildlife Habitats of California, all of the shrubs within the BSA are located within a highly disturbed, urban habitat (upland) (see Figure 15 of the EIR). An exit hole survey determined that of the 17 elderberry shrubs observed, only 4 contained exit holes. Table 8 below from the EIR displays the elderberry shrubs were found and the distance to the nearest riparian habitat.

Elderberry	Shrub	Habitat Type	Exit holes	Distance From Nearest
Number				Riparian Habitat
1		Upland, Non-riparian	Absent	6,190 feet
2		Upland, Non-riparian	Absent	6,190 feet
3		Upland, Non-riparian	Absent	6,190 feet
4		Upland, Non-riparian	Absent	6,190 feet
5		Upland, Non-riparian	Absent	6,190 feet
6		Upland, Non-riparian	Absent	6,190 feet
7		Upland, Non-riparian	Absent	1,150 feet
8		Upland, Non-riparian	Absent	1,150 feet
9		Upland, Non-riparian	Present	1,190 feet
10		Upland, Non-riparian	Absent	1,190 feet
11		Upland, Non-riparian	Absent	1,190 feet
12		Upland, Non-riparian	Absent	1,190 feet
13		Upland, Non-riparian	Present	1,190 feet
14		Upland, Non-riparian	Absent	1,190 feet
15		Upland, Non-riparian	Absent	1,190 feet
16		Upland, Non-riparian	Present	1,190 feet
17		Upland, Non-riparian	Present	1,190 feet

Table 8: Elderberry Shrubs located within the BSA

Although VELB exit holes were observed in a small number of elderberry shrubs within the BSA, the shrubs are extremely isolated from other elderberry shrubs or riparian habitat. Considering all shrubs are in upland habitats and no trimming or removal of elderberry shrubs would occur, take of the VELB would not occur. Therefore, based on the 2017 *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle*, the project would have no effect to VELB and Section 7 consultation with USFWS is not required. In addition, no designated Critical Habitat occurs within the project area; therefore, no FESA consultation for project effects to Critical Habitat is required.

Response 12S:

The proposed 4.8-mile trail project would require the removal of approximately 161 trees within City right of way that 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. The City would comply with City Code 12.56.040 prior to removal of the protected trees pursuant to Sacramento City Ordinance 2016-0026, Chapter 12.56 City and Private Protected Trees:

12.56.040 Removal of City trees - Public projects.

- A. Whenever feasible, the city shall modify the design of public projects to avoid the removal or damage to city trees.
- B. If the city proposes to remove city trees that have a DSH of four inches or more as part of a public project that otherwise requires city council approval, the city project manager shall provide written justification to the director of the need to remove city trees for the public project. The director shall review the written justification and if the director agrees with the written justification the director shall make a recommendation to the city council to approve the request to remove the city trees. The request for approval from city council may take place at any stage of the public project but the city shall obtain council approval prior to removing the city trees. City

trees proposed to be removed as part of a public project that either does not require city council approval or has a DSH less than four inches shall be removed as provided in section 12.56.030.C.

C. The director shall provide written notice of the proposal to remove city trees as part of a public project by posting a notice of the time, date, and location of the city council meeting during which the city council is to decide whether or not to remove city trees in a conspicuous place on or in proximity to the trees at least 15 days prior to the city council meeting.

The entirety of Ordinance 2016-0026 regarding tree removal within the City can be found at: <u>https://www.cityofsacramento.org/-/media/Corporate/Files/Public-Works/Maintenance-Services/SCC-1256.pdf?la=en</u>

Pursuant to City Code 12.56.040, there is no threshold of significance established for the removal of City trees for public projects; therefore, this impact is considered less than significant. The EIR checklist in Appendix A and discussion within Impact BIO-5 have been updated to reflect this change. To further minimize potential impacts to trees, the City would establish a replacement plan prior to removal of the protected 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. See measure AES-1 in Section 2.1 of the EIR.

The Reduced Tree Removal alternative would significantly reduce the number of oak trees removed throughout the Project corridor as compared to the proposed Project; however, this alternative would also require the removal of approximately 50 percent of the historic track in order to avoid impacts to trees which would potentially result in a Finding of Adverse Effect to the historic resource by the State Historic Preservation Office (SHPO). The City revised the Project alignment which increased the number of trees removed but significantly reduced the amount of proposed track removal to approximately 2 percent.

Response 12T:

A Phase II testing report was prepared, and soil testing was completed. This information is included on page 183 and Appendix J.4:

Limited Soil and Railroad Ballast Investigation Results

A soil and ballast material investigation along the railroad tracks was conducted on November 10, 2017 by Rebecca Silva with Geocon to evaluate whether or not pesticides and metals were present at concentrations that would be a threat to the health of future site users. Testing was conducted at 10 locations throughout the project site (see Figure 16). No specific evidence of contaminant impacts (e.g., chemical odors, staining, features/equipment) other than the railroad and ballast itself were observed during the Phase I ESA, as stated above; therefore, limited investigation borings were conducted at approximate 1/2 mile intervals along the trail alignment.

With the exception of arsenic, Contaminates Of Concern (COCs) were either not detected in the ballast and soil samples, or were detected at concentrations less than the most conservative Tier I residential Environmental Screening Levels (ESLs) and therefore do not represent a threat to human health for future site users.

The reported arsenic concentrations are within the range of naturally occurring concentrations with the exception of arsenic in the soil sample from location B2 which was slightly elevated at a concentration of 21 mg/kg. Outlier concentrations are not uncommon and do not necessarily suggest a contaminant impact. If stained soil or other evidence of contamination are encountered during construction of the trail, a qualified environmental consultant should observe and collect samples for analysis to determine if further action is warranted.

Background concentrations of arsenic in California can be variable, and the Limited Soil testing report calculated 95% upper confidence limit for the ten soils samples collected from the site is 12.5 mg/kg; however, further samples will be collected for arsenic analysis on each side of boring B2 prior to construction. Measure HAZ-2 has been included within the EIR:

HAZ-2: Additional testing for arsenic on each side of boring B2 shall occur prior to construction. Should arsenic concentrations exceed the range of naturally occurring concentrations, the City and Contractor shall follow the appropriate protocol for soil disposal and handling. If stained soil or other evidence of contamination are encountered during construction of the trail, a qualified environmental consultant should observe and collect samples for analysis to determine if further action is warranted.

Response 12U:

The closest documented source of potential soil vapor is located at 1301 Florin Road. Excavation for trail construction wouldbe shallow and the trail construction wouldnot be directly over the source area at the Former Huggins Cleaners; therefore, a soil vapor survey is not warranted at this time.

The proposed project would not result in any long-term, operational air quality impacts. Measure AIR-2, set forth below for convenience, is included in the EIR to address potential temporary, short-term, impacts related to diesel particulate matter:

AIR-2: Basic Construction Emission Control Practices – California regulations limit idling from both on-road and off-road diesel-powered equipment. The California Air Resources Board enforces the idling limitations. The following practices describe exhaust emission control from diesel powered fleets working at a construction site:

• Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to five minutes [required by CCR, Title 13, Sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site. Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.

• Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Response 12V:

The sensitive receptors discussion in the EIR has been updated on page 44 to include the complete list of sensitive receptors:

"The nearest sensitive receptors in the vicinity of the project site are residences, schools, and daycares approximately 30 feet from the trail throughout the 4.8-mile corridor."

The additional information included does not change the analysis or conclusions in the EIR regarding this subject.

Response 12W:

The Road Construction Emissions model has been updated to include all import/export material. Approximately 5,410 CY of dirt and asphalt would be excavated, and 35,500 CY of dirt would be imported/borrowed over a period of 6 months. The estimated truck trips for construction is 34 per day. The contractor would determine where the import/borrow material would come from prior to construction. As shown in the updated model and Table 5 of Section 2.2, because temporary construction emissions are expected to be well below the thresholds of significance for all criteria pollutants, the proposed project would not violate any air quality standards. No long-term, operational emissions would occur. The updated construction emissions model and supporting data is now included in Section 2.2 and Appendix D of the EIR.

Response 12X:

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 12Y:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 12Z:

In 1977, the Interstate Commerce Commission granted Southern Pacific Transportation Company, through Certificate and Order AB-12 Sub No. 40, the authority to abandon a 13.86 mile stretch of railroad from Sacramento to Hood, inclusive of the segment within the Del Rio Trail project area. On June 5, 1979, in a letter to the Interstate Commerce Commission, Southern Pacific Transportation Company provided written communication that the abandonment of the line as authorized by the Commission was completed. The currently segmented, abandoned rail within the proposed project area is not an active running agricultural freight train and has not provided freight services for growers since 1979. Additionally, there are no parcels within the project area zoned for agricultural use. Parcels directly south of the project site are zoned "A" for Agricultural; however, the current land use for those parcels is for operation of the Freeport Water Tower (see Figures 4 and 5). There are no other parcels zoned for agricultural use located within or directly adjacent to the project area; therefore, no impacts to agricultural resources would occur.

Response 12Aa:

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.

Response 12Ab:

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 13: State Clearinghouse, Scott Morgan, Director (December 20, 2018)



Edmund G. Brown Jr.

Governor

STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



COMMUNITY DEVELOPMEN DEPARTMENT

DEC 2 1 2013

December 20, 2018

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

Subject: Del Rio Trail Project SCH#: 2018062009

Dear Tom Buford:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 19, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

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

Sincerely. Scott Morgan

Director, State Clearinghouse

Enclosures cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044 TEL 1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

Response 13:

Thank you for your comment on the proposed Del Rio Trail Project. The Project is in compliance with the State Clearinghouse and Planning Unit review requirements for draft environmental documents pursuant to CEQA. The project has responded to all public comments, and comments from agency representatives interested in the project.

PUBLIC COMMENTS

Comment 14: Antero and Melinda Rivasplata (December 10, 2018)

December 10, 2018

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

RE: Del Rio Trail Project

Dear Mr. Buford:

These are our comments on the Draft EIR prepared for the Del Rio Trail Project (Project). We the undersigned have worked as environmental consultants focusing on the preparation of EIRs under the California Environmental Quality Act (CEQA) for over three decades.¹ As Deputy Director of the Office of Planning and Research during the late 1990s, Antero Rivasplata helped draft three updates to the State CEQA Guidelines. Currently, in addition to working as a CEQA consultant, he presents classes on CEQA through UC Davis and UC Los Angeles Extensions. In general, the DEIR is inadequate in several aspects. This is particularly important in that it does not provide City decision-makers with a reasonable range of project alternatives to consider. In addition, the project, as proposed and described in the DEIR, contains essential flaws that should disqualify it from approval. Our comments are in order of appearance of the particular subject in the DEIR.

Project Description

Where is the project description? Six paragraphs and a list of construction equipment in the Draft EIR's Introduction are not sufficient to describe the entirety of the Project. Similarly, while the figures provided in the Introduction are helpful, they do not provide sufficient detail to allow a reviewer to understand what is being proposed with enough detail to allow an informed review. *Chapter 1.0, Proposed Project* contains very little detail about the proposal. For example, no information is provided there regarding key project elements such as construction methods (beyond typical machinery used), tree/landscaping removals, lighting (if any), parking facilities (if any), provisions for street crossings and bicycle/pedestrian safety, and security (during operations). While some of these elements are discussed in the impact analysis sections, the lack of a discrete stable project description located in one place within the Draft EIR effectively "impairs the public's right and ability to participate in the environmental review process" (*Washoe Meadows Community v. Department of Parks and Recreation* [2017] 17 Cal.App.5th 277).

Visual/ Aesthetics Impact

This analysis, as represented in the *Visual Impact Analysis*, fails to account for extensive existing use of the Del Rio rail corridor by walkers, joggers, and occasional cyclists between South Land Park Drive and Fruitridge Avenue. In effect, the corridor is currently a public walkway providing public views of the extensive landscaping that exists in this portion of the corridor. The "Viewer Sensitivity" discussion of the *Visual Impact Analysis* (see page 13 of the analysis) fails to recognize this crucially important viewer group and the Project's impact on their views. Further, the corridor between South Land Park Drive and Fruitridge Road contains large trees that are visible from nearby public roads. This visibility is incorrectly minimized in the discussion of

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¹ This comment letter represents the personal opinions of the authors and does not represent the opinions of their respective employers.

"Roadway Users" on page 13 of the analysis; this analysis fails to acknowledge that many "roadway users" are pedestrians and bicyclists.

Contrary to the statements in the *Visual Impact Analysis* that the corridor has "[n]o scenic resource" (see page 6 of the analysis) and its visual quality is "moderately low" (see page 12 of the analysis), this landscaping is an obvious, high quality scenic resource. Rather than "shielding residential views" (see the statement under Figure 5 of the analysis), this provides a quiet, landscaped corridor with wildland elements that are missing in this otherwise suburban residential neighborhood. The scenic value is enjoyed by existing users of the corridor. Draft EIR Figures 7 and 8 offer clear illustrations of the existing aesthetic quality of the corridor. The impact on public and private views are worthy of consideration (*Ocean View Estates Homeowners Assoc., Inc. v. Montecito Water District* (2004) 116 Cal.App.4th 396).

The following photo illustrates a redwood tree visible from Del Rio Road.



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Removing trees and other landscaping for the trail would substantially change the existing conditions. The aesthetic "intactness and unity" of the corridor would not "remain the same" nor "potentially benefit" from the Project, as claimed on page 12 of the analysis. The significant impact resulting from removal of landscaping and especially trees along the corridor should be disclosed in the DEIR. Neither Impact AES-1 nor Impact AES-3 make this disclosure. Contrary to the statement in Impact AES-3, there are not "high levels of litter, debris, and miscellaneous objects" scattered along the portion of the trail corridor that we are familiar with between Sutterville Road and 35th Street.

С

Following is a photo of the trail, looking directly north of its intersection with Del Rio Road.



The Draft EIR indicates that a total of 220 trees will be removed from the trail right-of-way, including 161 trees that qualify as "protected City trees." (See the discussion under Impact AES-3). However, no diagram or plan is provided that illustrates the location of these trees along the trail and in the context of existing visual character. As a result, it is impossible to determine that the removal of these trees would not have a significant effect. Certainly, removal of 220 trees, including 161 important enough to otherwise warrant protection, is a substantial change from existing conditions. State CEQA Guidelines Section 15382 defines a "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area." The loss of trees should be considered significant.

Mitigation measure AES-1 is vague and open-ended. It would not prevent the removal of the 220 trees mentioned in Impact AES-3. The term "where feasible" does not ensure that it will be implemented. Further, the measure does not contain a description of the referenced "replacement plan" (including performance standards and measures of effectiveness) that would ensure that such a plan would provide any mitigation at all. The replacement plan appears to be improperly deferred mitigation, as disallowed by CEQA case law.² In all, the mitigation is insufficiently

² For examples: Preserve Wild Santee v. City of Santee [2012] 210 Cal.App.4^b 260, Communities for a Better Environment v. City of Richmond [2010] 184 Cal.App.4^b 70, San Joaquin Raptor Rescue Center v. County of Merced [2007] 149 Cal.App.4th 645, and others.

detailed to allow the public and decision makers to make an informed decision. Clearly, measure AES-1 does not mitigate this impact.

The Draft EIR makes only passing reference to lighting associated with Project operation (see Impact AES-4). No specific lighting plan or location of lighting at intersections is provided. The absence of a definitive discussion of operational lighting precludes the ability to determine whether trail lighting would have an aesthetic impact.

Avoidance and Minimization Measure VIA-1 is inadequate to mitigate the impacts on aesthetic resources. Its restrictions on the removal of trees apply to private property and there are no restrictions on removal of other landscaping. As a result, they would not apply to the corridor, which is publicly owned.

Here is another photo of the corridor, looking north from Del Rio Road. This illustrates the scenic value of a portion of the existing trail that is in extensive use by neighbors. There is little or no trash or litter on this portion of the corridor.



Biological Resources

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The biological resources analysis incorrectly concludes that the Project has a low potential for take of Swainson's hawk. We live at 4900 Alta Drive, approximately 1 block away from the Project site. Last spring we had a Swainson's hawk pair successfully raise a chick in the large evergreen behind our home. Similar trees exist within the Project site, in particular in the section between South Land Park Drive and Del Rio Road, that could provide nesting opportunities for

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Swainson's hawk. Removal of such trees as a result of the Project could result in take of Swainson's hawk unless mitigated.

Greenhouse Gas Analysis

The project is unlikely to result in significant greenhouse gas (GHG) emissions. However, it's worth noting that the analysis contained in the DEIR is totally inadequate. It is fatally flawed by its reliance on the methodology of a 29% emissions reduction relative to business as usual. That approach was disallowed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 204. Further, the references to federal law are not pertinent to the analysis in that there are no federal laws or regulations limiting or otherwise establishing a significance threshold for GHG emissions.

Transportation and Traffic

The Draft EIR fails to consider safety for bicyclists and pedestrians and disclose impacts at the intersections of the at-grade Class 1 bike path with Sutterville Road, South Land Park Drive, Del Rio Road, and Fruitridge Road. All of these are currently uncontrolled intersection crossings that would be potentially unsafe for trail users. Not only does the Draft EIR fail to analyze safety, it also fails to include specific mitigation measures to reduce the risk to cyclists and pedestrians to a reasonable level. Impact TRANS-4 addresses curves in the trail itself, and fails to fully describe and mitigate conflicts with vehicle traffic on roads crossing the proposed bicycle trail. The oblique reference in Impact TRANS-4 to "Lighting and pedestrian crossing signalization would be constructed where the trail crosses intersections" is insufficient to disclose the risk and describe the site-specific measures that will be required. This does not allow a reviewer to know both the level of risk to pedestrians and cyclists, and whether there is feasible mitigation that would be adequate to avoid that risk.

The reference in the "Traffic Management Plan" and related Sacramento City Code Section 12.20.020 in the *Regulatory Environment* discussion applies only to construction. This impact would occur during operation of the Project, not its construction. This is a crucial concern that must be carefully mitigated in order to ensure the safety of future trail users. Unfortunately, the recent fatal pedestrian accident on Freeport Avenue highlights the danger of crossing high-speed roads without traffic controls.

We believe that failure to identify potential impacts and to fully mitigate the risk to bicyclists and pedestrians would be a fatal flaw to the Project. It should not be approved without specific requirements for vehicle traffic control at each the intersections described on the following pages.

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Sutterville Road. Sutterville Road traffic, particularly that approaching from I-5, typically moves at 40 miles per hour or more. This does not provide sufficient time for cyclists or pedestrians to cross the road whenever cars are in view. In combination with traffic approaching from the east coming out of the traffic signal at Land Park Drive, crossing can be substantially delayed. We have often had to wait for a minute or more for a safe break to cross this road on foot or jogging. Cyclists would be similarly delayed. If cyclists choose not to delay or misjudge the speed of oncoming cars, then they will be at substantial risk of collision. A traffic signal is needed here.

This photo, looking west along Sutterville Road from its intersection with the trail, illustrates the problem.



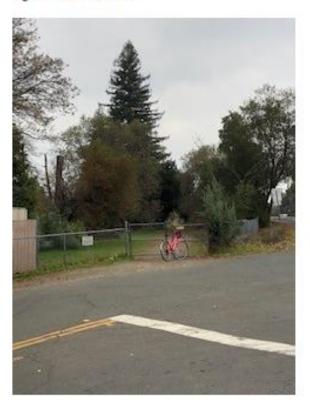
South Land Park Drive. Views are limited of traffic approaching from the south along South Land Park Drive when crossing the street from south to north. Similar to Sutterville Road, there is little time to cross the street when a car is seen approaching from the south. If cyclists choose not to delay or misjudge the speed of oncoming cars, then they will be at substantial risk of collision. A stop sign or traffic signal is needed here.

This photo of the view west from the corridor's intersection illustrates the problem. Note that South Land Park Drive dips substantially to the west of the intersection, further obscuring oncoming traffic.



Del Rio Road. Del Rio Road makes an acute turn as it crosses the Del Rio Trail alignment. As a result, vehicle drivers would have a very limited amount of time to see bicyclists on the trail and to stop accordingly. Adjustment of the existing stop sign, and installation of additional stop signs to control north and southbound vehicle traffic are needed here.

This photo, looking north across Del Rio Road on the corridor alignment illustrates the problem. Note the lack of a north-south stop sign, and the misalignment of the existing eastbound stop sign with the corridor.



Fruitridge Road. Sight lines at the intersection with Fruitridge Road are limited for cyclists travelling north. Traffic moving from the signal at Fruitridge and South Land Park Drive is typically moving at approximately 40 mph and, because of a curve in the road just west of the intersection with the proposed bike trail, cars are visible for only a few seconds. Similar to the crossing at Sutterville Road, a cyclist would have to wait until traffic clears from the east and there are no cars in sight from the west. Even under that circumstance, the rapid approach of vehicles from the west would make crossing risky. A traffic signal is needed here.

This photo, looking west from the north side of the corridor's intersection, illustrates the problem. Note that visibility of and from the south side of the intersection is substantially worse due to the curve in Fruitridge Road and change in elevation as it approaches the intersection from the west.



Under the State CEQA Guidelines as they exist at the time of this writing, traffic delay is considered a CEQA concern. The CEQA Guidelines revisions expected to be adopted by the Natural Resources Agency at the beginning of 2019 will remove this concern. In light of that pending change, we will not suggest that there be a traffic analysis of delay that may result from installation of traffic signals at Sutterville Road, South Land Park Drive, and Fruitridge Road. However, the City may wish to do so in order to inform decision-makers on this point.

Wildfire

The risk of wildfire is not adequately addressed in *Section 2.7, Hazards and Hazardous Materials.* The southern portions of the Project do not directly adjoin residential areas. This is similar to sections of the Jedidiah Smith trail along the lower American River. This stretch of the American River trail is subject to extensive use by homeless campers and untended campfires have resulted in numerous summer wildfires along the lower American River. The fact that undeveloped land is not identified on the CalFIRE maps of hazardous wildfire risk or within an urbanized area (see Impact HAZ-8) does not mean that such risk does not exist. Comments on Del Rio Trail Project Page 2

Use of the proposed Project by homeless campers is reasonably foreseeable, based on the similarity to the conditions along the Jedidiah Smith trail and the demonstrated risk in that area. The Draft EIR fails to adequately examine this issue and to include mitigation measures to ensure that the risk of wildfires will be less than significant.

Alternatives

An EIR must consider "a range of reasonable alternatives to the Project" (State CEQA Guidelines Section 15126.6[a]). The DEIR fails to do so. First, it improperly disposes of potentially feasible alternatives as infeasible. Second, it fails to include at least two additional alternatives that would both meet the Project's objectives and substantially reduce its impacts.

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The Draft EIR concludes that *Alternative 1 – Reduce Tree Removal* would not meet project objectives and reduce significant impacts without providing any analysis or explanation for that conclusion. There is no documentation why this alternative would not be feasible.³ Indeed, a narrower trail profile could still meet all project objectives. And, a reduction in tree removal could be accomplished by reducing the width of the bicycle path or eliminating the adjoining proposed two- to three-foot shoulder. While this alternative would not avoid impacts on the allegedly historical railroad tracks, it could avoid aesthetic and biological resource impacts. An alternative is not infeasible simply because it would have impacts of its own. The State CEQA Guidelines recognize that alternatives will have impacts of their own (Section 15126.6[d] "...If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.").

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Similarly, Alternative 2 - No Walking Path is dismissed without analysis. This alternative would reduce impacts on aesthetics and potential Swainson's hawk nesting habitat by reducing the need to remove trees. This comment is not intended to support the removal of the walking path; we actually believe that a walking path without the bicycle trail would be a better project (albeit one that doesn't meet the objectives of the Project) would be preferable. However, by summarily dismissing this alternative the Draft EIR fails to meet CEQA's mandate for a reasonable range of alternatives.

We suggest that there are at least two additional alternatives that should be considered in the Draft EIR. These alternatives meet all project objectives because they would provide for a Class 1 bicycle path and walking path, and retain the railroad track in place.

Additional Alternative: narrower bicycle path pavement width. Caltrans' Highway Design Manual, Chapter 1000 Bicycle Transportation Design, Section 1003.1(1) states that minimum paved travelway width of a two-way Class 1 "shall be 8 feet." In order to avoid impacts on adjoining landscaping that can adversely affect aesthetics and, where large trees would otherwise be removed affecting Swainson's hawk nesting, an alternative 8-foot-wide travelway must be considered. This would reduce the impact of

³ State CEQA Guidelines Section 15364 states: "'Feasible' means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."

Comments on Del Rio Trail Project Page 2

the proposed 12- to 16-foot wide paved bicycle trail substantially. This 25-50 percent reduction in width would not impede use of the trail for cyclists, but would provide additional room for an unpaved walking trail without requiring extensive removal of landscaping.

Additional Alternative: capped railroad track. This alternative would consist of capping the existing railroad track in place with a compacted soil covering and installing the bicycle path and walking trail on the capped track and adjoining land. This alternative would retain the track, avoiding the alleged loss of a historical resource, while largely avoiding the need to remove vegetation along the corridor. As with the prior alternative, it would avoid impacts on aesthetics and Swainson's hawk nesting habitat. This alternative would have the further benefit of ensuring that any hazardous materials associated with the track would be encapsulated and away from casual contact with trail users.

Finally, regarding the "environmentally superior alternative," the Project is not an alternative and therefore cannot be the environmentally superior alternative. This is clear in the State CEQA Guidelines' separation of *Project Description* (Section 15124) from the *Consideration And Discussion Of Alternatives To The Proposed Project* (Section 15126.6). Declaring the Project to be the environmentally superior alternative misrepresents the purpose of alternative analysis and falsely represents the Project as superior. In reality, the Project would not be superior to the No Build alternative, nor would it be superior to any of the other alternatives listed above.

Thank you for the opportunity to review and comment on the Draft EIR.

Sincerely,

Antero and Melinda Rivasplata

Response 14A:

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.

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Response 14B:

The existing use of the Del Rio rail corridor by walkers, joggers, and occasional cyclists are accounted for under the category of "non-roadway users" in Section 2.1 of the EIR:

Roadway Users

Viewer exposure for roadway users adjacent to the trail would be low. Roadway users would only have exposure to the Project site where the trail would be visible from the roadway. Freeport Boulevard from I-5 north to Belleau Wood Lane would have a direct line of sight to the proposed trail alignment. Additionally, roadway users would have visual exposure to the trail and its users where the trail crosses roads along the 4.8-mile alignment (35th Avenue, Fruitridge Road, Del Rio Road, South Land Park Drive, and Sutterville Road).

Other non-roadway users, including pedestrians, bicyclists, and other recreationalists, would also have visual exposure to the trail from use. A positive response from this user group is anticipated as the trail would provide recreational opportunities, as well as the use of other modes of transportation into the City of Sacramento. It is anticipated that the overall average response of all viewer groups to the proposed Project would be moderate.

Response 14C:

The proposed Del Rio Trail project corridor is not currently designated a scenic resource within the City General Plan.

Response 14D:

See Section 2.1 of the EIR. The proposed Project is anticipated to require select removal of trees throughout the Project corridor, which would result in a moderate resource change; 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."

AES-1: The City shall comply with City Code section 12.56.040 by establishing a replacement plan for any City trees that must be removed. The City shall replace the trees removed during project construction by replanting a minimum of 700 trees. If additional trees can be incorporated into the project design and planting plan above 700, the City shall plant where feasible. The exact number of trees and locations shall be determined during final design. The tree removal and replacement plan is subject to approval by the City Council.

Response 14E:

The City acknowledges that there are locations along the trail with little to no debris. Section 2.1, Impact AES-3 of the EIR has been revised to state: "Intactness, or the lack of encroachment or eyesores, is low due to litter, debris, and miscellaneous objects scattered throughout the disturbed vegetation areas and intermixed with the urban land cover." An additional representative photo has been included in Section 2.1 of the EIR showing litter and debris at various locations throughout the corridor.



Figure 12. Representative litter and debris along the corridor.

Response 14F:

Section 2.4 states that lighting will be added at roadway crossings only. No lighting is proposed along the trail. A detailed project description has been included within Section 1.0 of the EIR and a detailed project features exhibit is now included in Appendix C.

Response 14G:

Section 2.3 of the EIR states that no Swainson's hawks were observed during biological surveys; however, potential habitat for Swainson's hawk occurs within the project area. Avoidance and minimization measures are included within the EIR in Section 2.3 to address potential impacts to Swainson's hawk and nesting birds:

BIO-2: In accordance with the Swainson's Hawk Technical Advisory Committee Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (2000), protocol level surveys will be conducted during the appropriate survey periods immediately prior to construction to determine presence/absence of the species in areas in proximity to the Sacramento River. If Swainson's hawk nests are discovered within 0.5 mile of the Project area, appropriate protective measures will be developed in coordination with CDFW.

BIO-3: If possible, vegetation removal should occur outside the nesting bird season (February 15th –September 1st). 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.

A minimum 100-foot no-disturbance buffer for songbirds and a 250-foot buffer for raptors must be established around any active nests. The contractor must immediately stop work in the nesting area until the appropriate buffer is established and is prohibited from conducting work that could disturb the birds (as determined by the Project biologist and in coordination with wildlife agencies) in the buffer area until a qualified biologist determines the young have fledged.

Response 14H:

The referenced case is in regards to a development project making a determination that its operational GHG emissions are not significant based on AB 32 reduction targets; however, this case is not applicable for the Del Rio Trail Project as this project does not have any operational GHG emissions associated with its implementation. The reference to a 29 percent reduction from existing emissions is only pertaining to the question if the project conflicts with any applicable plan related to reducing the emission of GHG, in which the reference to AB 32 is applicable. The proposed Del Rio Trail project would provide an ADA-compliant, active mode of transportation to schools, retail, jobs, and recreational amenities in the Sacramento area. Projects of this type are generally expected to reduce vehicle miles traveled which would provide a net benefit to all types of air quality emissions.

Response 14I:

Traffic control will be implemented at all crossings for cyclist and pedestrian safety. A Technical Memorandum was prepared by Y & C Transportation to summarize the analysis and recommendation for appropriate crossing treatments at each intersection within the project area. This study is now included in Appendix J of the EIR and is available on the City's website for review at <u>http://www.cityofsacramento.org/delriotrail</u>.

The project description has been updated in Section 1.0 to reflect all traffic control components of the project.

Response 14J:

The new trail will provide maintenance access to the City resulting in the removal of brush and other fire hazards. Discussion within Impact HAZ-8 in Section 2.7 has been revised to state:

"The proposed Project corridor is not designated as a wildland and the City of Sacramento is not considered to have a high wildland fire danger (City of Sacramento Fire Department 2016). Additionally, the trail would be used for recreational purposes which would limit the exposure of people to risks from wildfires. Further, the new trail would provide maintenance access to the City resulting in regular removal of brush and other wildfire fuel. Therefore, the proposed Project would have a less than significant impact related to wildland fires."

Response 14K:

The width of the multi-use trail (paved surface and shoulders) was developed through the consideration of numerous factors, including: consultation with bike/ped experts (local and national), observation of the functionality of existing trails (local and national), engineering design guidance (federal and state), and level of service calculations for the proposed trail based on the estimated volumes of bicycle and pedestrian traffic anticipated. Based on these considerations, as well as the goal to provide safe operations while minimizing cost and environmental impacts, the optimal minimum trail width was determined to be a 12-foot paved surface with 2-foot unpaved shoulders to meet the anticipated volume of users.

Reducing the trail width to regulatory minimum dimensions would produce a nominal change while substantially sacrificing operability, and ultimately this would not change the feasibility of the alternative.

Response 14L:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 14M:

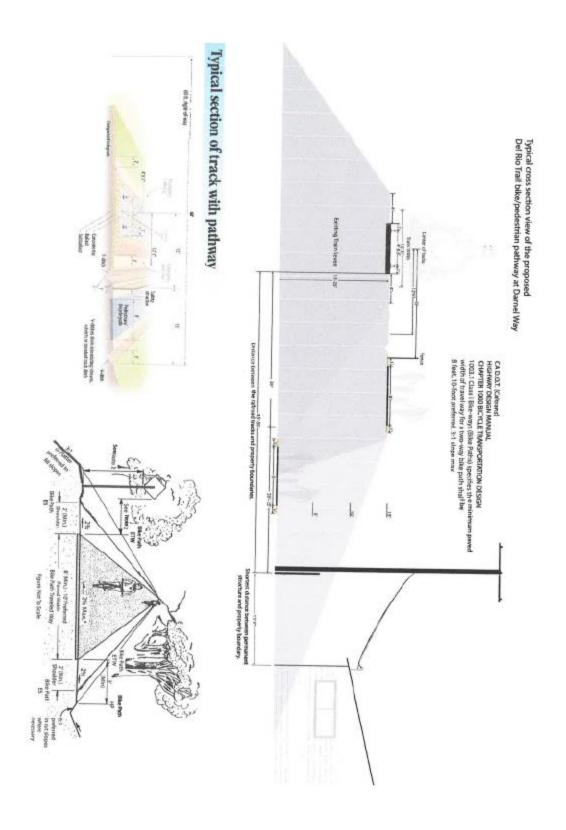
Capping the existing track with compacted soil and installing the trail on top of the rail is not considered a feasible alternative due to bicycle and pedestrian safety concerns. When steel rails remain and are buried or embedded in asphalt concrete, there is a safety concern because asphalt is a flexible 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

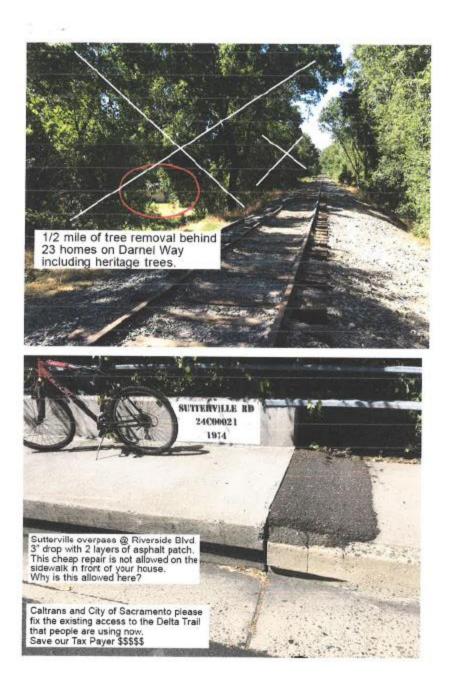
embedded/buried rails would eventually result in gaps/cracks that can catch bike tires and loose debris that can cause slippage or unexpected tire rupture.

Response 14N:

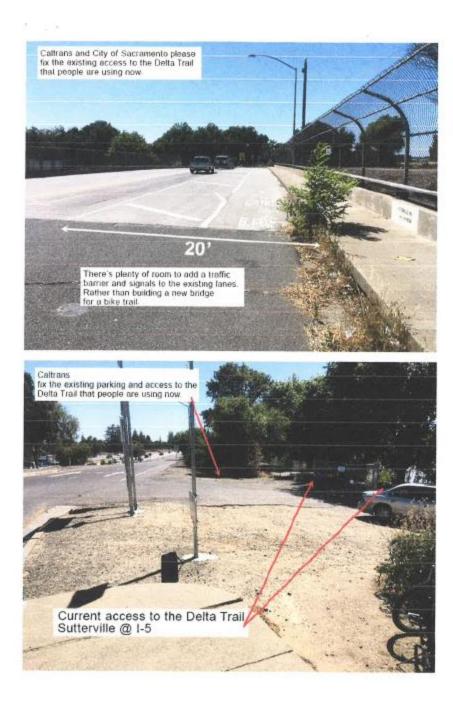
"Proposed Project" has been replaced with "Build Alternative" throughout the EIR. As required by CEQA guidelines, the EIR has been updated to also include a full discussion of the No-Build Alternative as a feasible alternative to the Build Alternative. Comment 15: Leonard Rogers (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT	DEL RIO TRAIL	City of SACRAMENTO Department of Public Works
COMMENT CARD	PROJECT	Department of Public Works
Public Information Meeting	The period for public review and comment is	
Thursday, December 6, 2018	November 5, 2018 through January 3, 2019.	-
Name: Leonard Rogers	Address (Optional)	
Telephone (Optio		
Organization (Optional):		
	to fix the SuttervillRd. e	
This project will increase	il need to be addressed	ss Riverside Blue
& 1-5. The crossing h	il need to be addressed	d. Caltrans
should build a podest.	ranbudge Ve cound s.	econfigure
the Riverside Blud o	nand of ramps to ge	concerta room
for the bike trails.	D	
These is a heritage	e tree that would be	Semoved
at the end of Par	e tree that would be nelling. (25' in circumfi	sence.)









Response 15:

Thank you for your comments. The project will provide a gap closure by constructing a new sidewalk along Sutterville Road from the railroad crossing to the existing sidewalk segments that ends shortly before the Riverside Boulevard on-ramp; however, no improvements are proposed over I-5 as part of the project. The City will consider your recommended sidewalk improvements at the I-5 overcrossing as a separate project, as that is currently outside of the Project Area Limits.

No new bridge is proposed at this location as a part of this project. Traffic control would be implemented at all crossings for cyclist and pedestrian safety. A Technical Memorandum was prepared by Y & C Transportation to summarize the analysis and recommendation for appropriate crossing treatments at each intersection within the project area. This study has been included in Appendix J and is available on the City website for review at: http://www.cityofsacramento.org/delriotrail.

The project description has been updated in Section 1.0 to reflect implementation of all traffic control components of the project.

The City is committed to protect in place, where feasible, all City or Private Protected Trees, as defined under Sacramento City Ordinance 2016-0026, Chapter 12.56 City and Private Protected Trees. Measures AES-1 included in the document ensures that the City follows this ordinance. 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 16: Pinki Cockrell (December 6, 2018)
	DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD Public Information Meeting Thursday, December 6, 2018
	Name: Pinki Cockrell Address (Optional
	Telephone (Optioning) Retired LPCA Board Parks Chair
	Urganization (Optional)
Α	comment: prainage a water courses cited are only what is currently observable
	but disregards historic drainage that may be affected when fis infrastructure
	is removed such as at 27th Normondy Burns Slough drained through
	William Land Park, ending at Munger's Lake now primarily observed in Reichmoth. Pork, The current RR bern is approximately is not actually above it. Please
	study hydrolics further at this site before disturbing.
В	(2) Page 939 103 state Swainston Hawks and pests were not observed 5/1285/17.
	This is not representative! They have been observed in both William Land Park and in the area between sutterville and 217th in the not bed vacin it photos have been taken. I don't have any photos, I'm not a birder ! Li are
с	Public Information Meeting City of Sacramento Department of Public Works 915 1 Street Sacramento, CA 95814
D	(D) a 1 total share and an usage allo by it and pards rapp asserts adjacent
	Induscoping. It also adds heat and acfects drainage. Minimize hard
	landscaping. If 9150 adds near and acteus duringer minimize in the Scape and artificial anti-emargent material such as weed cloth/plastic. In the Side composed grapite in the current rail bed, berned at the side by ties and rails sormanager of Environmental Planning Services I am on a walker the try of Sacramento to of the time a I can use it.
	side by ties and rails Sor Manager of Environmental Planning Services
	I am on a walker the try of sacramento of the time a I can use it
	readily (walkways in por Deommunity Development Department
Е	5 Minimize tree removal that not only is aesthetic a sound attenuating, but that also locks up carbon. Is the RR over
	attenuating, but that also locks up carbon. Is the RR over
	he-uses trees can be nemoval can be re-uddressed
F	(1) I have a set of the protect will be mile power of the construction
	the second of the been average the second of
	also disturb the landscape and could a seect drainage. Pails have

Response 16A:

Thank you for your comments. 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. The site's hydrology will be extensively reviewed prior to construction of the project.

Response 16B:

The nearest recorded Swainson's hawk occurrence is less than 1 mile from the project area; however, during project specific biological reconnaissance surveys, no Swainson's hawks were observed within or adjacent to the project area. Regardless, Measure BIO-2 ensures that Swainson's hawk protocol surveys are conducted prior to construction. If any nests are discovered in proximity to the project area during these surveys, they will be protected according to additional measures as specified during coordination with CDFW.

Response 16C:

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 16D:

The Class I multi-use trail is anticipated to be constructed with pavement; however, the shoulders will remain unpaved. The project requires the Class I trail to be paved as the Highway Design Manual defines the structural section of Class I trails as "smooth, well drained, all-weather riding surface with skid resistant qualities, free of vegetation growth." The City will consider reducing hardscape during final design in order to maintain existing vegetation and minimize project impacts.

Response 16E:

The City is committed to protect in place, where feasible, all City or Private Protected Trees, as defined under Sacramento City Ordinance 2016-0026, Chapter 12.56 City and Private Protected Trees. Measure AES-1 included in the document ensures that the City follows this ordinance. 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.

Response 15F:

Section 2.4 of the Final EIR discusses impacts to the existing rails. The project acknowledges that ,where rails exists, the majority of the track will be retained, 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.

Two sections of track that require removal for safety or ADA requirements are proposed to be salvaged and reused in adjacent areas where track is already missing in order to reduce net loss of track resulting from the Project. Other sections of track at certain major intersections will be encased in concrete—leaving the steel rails visible—to increase safety. The various strategies involving disturbance of the rails can be found below.

Track removal is limited to the following areas:

- North of Z'Berg park, where the skew of the existing track against the proposed bike path creates a safety hazard
- Roadway approaches, where the skew of the existing track against the proposed bike path creates a safety hazard
- At the intersection of Sutterville Road, to increase safety at the crossing. In addition to increasing safety, track removal at this location will facilitate other Project goals and safety features, including reducing the intersection length and improving the visibility of new signals.
- A wooden trestle bridge that was partially burned in an accidental fire and is now unsafe.

Track will be retained in place and encased in concrete at the following locations:

- South Land Park Drive
- Del Rio Road
- 35th Avenue
- 43rd Avenue

Track will be salvaged and reused in adjacent areas to the following locations:

- The vicinity of the 27th Avenue/Normandy Lane/Del Rio Road intersection
- Across the waterway south of Charlie Jensen Par

Overall, track removal will only constitute approximately 2 percent of the total remaining historic fabric where necessary for safety reasons and will otherwise be avoided.

Comment 17: Betty and Ferdinand Morant (December 6, 2018)

The Del Rio Trail Project,

December, 6th. 2018

I have enjoyed the Del Rio Trail for many years, walking the dog and connecting with people. I have studied the Project report, and I would like the trail to stay as it is.

It is very expensive, and the money could be spent on many more important projects.

Two to three feet unpaved trail is not very enjoyable.

My suggestions: Leave the trail as is,

But go through the trail and cut the Foxtails like they used to, and

Pick up the dry, cut, branches. It is a fire hazard.

Thank you for listening!

Betty and Ferdinand Morant

Betty Morant

Response 17:

Thank you for your comment. Your preference for the No Project Alternative is noted; however, this would not provide a key Project objective of providing a bicycle route connecting other segments of bicycle trails in the City. The No Project Alternative does not meet the Project's purpose and need. As part of the project, the City would periodically conduct maintenance activities for the trail such as brush removal to prevent fire hazards.

Comment 18: Moira Monahan (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD	DEL RIO TRAIL	Gity of SACRAMENTO Department of Public Works
Public Information Meeting Thursday, December 6, 2018	The period for public review and comment is November 5, 2018 through January 3, 2019.	
Name: Moira Monahan	Address (Optional):	A 10 01
Telephone (Optional):		,
Organization (Optional):		
- · · ·	have been alleviated, a ret. It has been press	ented t
LADED 0	,	

Response 18:

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

Comment 19: Rick Stevenson (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD Public Information Meeting Thursday, December 6, 2018	DELL RIO TRAIL P R O J E C T The period for public review and comment is November 5, 2018 through January 3, 2019.	SACRAMENTO Department of Public Works
Name: Rick Stevenson	Address (Optional):	
Telephone (Optiona		
Organization (Optional):		
comment extremely was	ste ful boon dogge	
Same the por es	Sective use can be had	for
20% 02/ess 05 p	rojected cost.	
54.		

Response 19:

Thank you for your comment. The City's goal is to keep costs as minimal as feasible while still providing the Sacramento area with a Class I multi-use trail which is necessary to meet the project's purpose and need.

Comment 20: Linnea Fronce (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD	DEL RIO TRAIL	SACRAMENTO Department of Public Works
Public Information Meeting Thursday, December 6, 2018	The period for public review and comment is November 5, 2018 through January 3, 2019.	
Name: LINNEA FRONCE	Address (Optiona	2.5
Telephone (Optional):		
Organization (Optional):		1
comment: We will need	self closing gates at	Sutterville
Del Rio + Fruitrick	ge so dogs can't g	et aut.
This is NOW the	only area for ser	ple to
come with dogs &	tet them est dees	ch. This is
a dog park for per	ple who actually u	alk with
There dogs hather	than sit while a	ogo play.
Most day parks ha	ve no woodland and	busheb
for exploration		
/ //		

Response 20:

Thank you for your comment. The proposed project consists of a Class I multi-use trail which is necessary to meet the project's purpose and need. Self-closing gates at Sutterville Road, Del Rio Road, and Fruitridge Road are not currently a part of the proposed project features.

Comment 21: Steve Evans (December 6, 2018)

	The second se	EL RIO TRAIL	City of SACRAMENTO Department of Public Works
		od for public review and comment is ber 5, 2018 through January 3, 2019.	
	Name: Steve Exbris	Address (Optional):	
	Telephone (Optional):		
	Organization (Optional):		
	comment: I don't support the prop	used project because ?	t cetains the
Α	fails and requires more tree re	•	
	Remarkal alternative. The hiss	orizingture of the r	ails can be
	documented with appropriate	plaques/historic ma	Hers. The EIR
	grossly understates the wild		
В	seen (ed-tailed howks, ced-5)	nouldered hawks, cooper	's hawks, Sharp-
	Shinned hawks, Swo Moon's hawk	s, and a great-horne	ed aul. I'm con-
с	cerned that the tree removal	required for the proj	ect will impact
	this wildlife. Private encoach	mentan the ROW should be a	add ressed.

Response 21A:

Thank you for your comments. The Reduced Tree Removal alternative would reduce the number of oak trees removed throughout the Project corridor as compared to the proposed Project; however, this alternative would also require the removal of approximately 50 percent of the historic track in order to avoid impacts to trees which would result in an Adverse Effect to the historic resource. The City revised the Project alignment which increased the number of trees removed but substantially reduced the amount of impacts to the historic rail.

Response 21B:

The City understands that trees within the project area provide habitat for various avian species. During the biological surveys, evidence of potentially suitable nesting habitat was observed within the trees and shrubs within the project area. Trees will be removed throughout the Project corridor as a result of the proposed Project; however, nesting bird surveys will take place prior to removal. The 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 AES-1, BIO-3 and BIO-4 (below), no impacts to avian species are expected.

AES-1: The City shall comply with City Code section 12.56.040 by establishing a replacement plan for any City trees that must be removed. The City shall replace the trees removed during project construction by replanting a minimum of 700 trees. If additional trees can be incorporated into the project design and planting plan above 700, the City shall plant where feasible. The exact number of trees and locations shall be determined during final design. The tree removal and replacement plan is subject to approval by the City Council.

BIO-3: If possible, vegetation removal should occur outside the nesting bird season (February 15th –September 1st). 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.

A minimum 100-foot no-disturbance buffer for songbirds and a 250-foot buffer for raptors must be established around any active nests. The contractor must immediately stop work in the nesting area until the appropriate buffer is established and is prohibited from conducting work that could disturb the birds (as determined by the Project biologist and in coordination with wildlife agencies) in the buffer area until a qualified biologist determines the young have fledged.

BIO-4: If construction on the existing bridge is planned to occur during the swallow nesting season, measures will be taken to avoid impacts to migratory swallows. To protect migratory swallows, unoccupied nests must be removed from the existing bridge structure and swallow exclusionary devices installed prior to the nesting season (February 15^{th} – September 1^{st}). During the nesting season, the bridge structure must be maintained through the active removal of partially constructed nests. Swallows can complete nest construction in approximately 3 days. After a nest is completed, it can no longer be removed until an approved biologist has determined that all birds have fledged, and the nest is no longer being used.

Response 21C:

The proposed project would not require the acquisition of private property in order to construct the proposed multi-use trail.

Comment 22: Ron Brasel

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD Public Information Meeting Thursday, December 6, 2018	DELT RIGHT E CONTRACTOR CONTRACT	SACRAMENTO Department of Public Works
Name: Ron Brasel	Address (Optional):	
Telephone (Optional)		
Organization (Optional):		
comment: 1 suggest the	at more thought l	e par
towards activat	ing underdeveloped	areas
(south of Florin Roc	at to fully activate	that
portion of the trai	1. The city should so	licit a
	is the Pocket Road es	
For safety reason:	s the trail should	begin
	e southern end to of	0 11
alternative to Free	eport Blud which has	a history
of fatal bike vs.	car collisions.	/

Response 22:

Thank you for your comments. The City does not have plans to solicit a bike shop or deli near Pocket Road at this time. The City is considering all construction phasing options and will select an appropriate strategy during final design.

Comment 23: Carl Sjovold

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD Public Information Meeting Thursday, December 6, 2018	DEL RIOTATION P ROJECT The period for public review and comment is November 5, 2018 through January 3, 2019.	SACRAMENTO Department of Public Works
Name: CARL STOVOLP	Add	
Telephone (Optional):		
Organization (Optional):	·	
Comment: An excellent pro	posal. Please make s.	re Rutit
is not ruised by	posol. Please make s. The securition trains.	
· · · · · · · · · · · · · · · · · · ·		
· · · · · · · · · · · · · · · · · · ·		
50 -		

Response 23:

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

Comment 24: Ron Brasel (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT	DEL DIO TRA	TT. SACRAMENTO
COMMENT CARD	PROJECT	Department of Public Works
Public Information Meeting	The period for public review and cor	
Thursday, December 6, 2018	November 5, 2018 through January	3, 2019.
Name: Ron Brasel	Address (Optional):	
Telephone (Option		
Organization (Optional):		1
comment: Trail Parkin		
Freeport Blud horth	n of Florin R	d. If that
were moved further	south close.	to Pocket Rd
	ictivate that un	
section of trail.		
2		
Α		
		4

Response 24:

Thank you for your comments. Exact locations of trail parking areas will be determined during final design. A detailed project features exhibit has been included within the EIR in Appendix D. Currently two parking lots are anticipated to be constructed for access to the trail from, one at San Mateo Way and one at Freeport Boulevard; however, if feasible, additional parking areas may be considered or these locations may be modified to better meet the needs of the community.

Comment 25: Lori Namba-Oto (December 6, 2018)

IMPACT REPORT DEL RIO TRAIL
COMMENT CARD PROJECT Department of Public Works
Public Information Meeting The period for public review and comment is
Thursday, December 6, 2018 November 5, 2018 through January 3, 2019.
Name: Lori Namba- Oto Address (Optional):
Telephone (Optional):
Organization (Optional):
comment: In my opinion, the fruit crate seating the
is not asthetically pleasing and lowers the
professional () "culls # appeal "
examplified by the other landscaping
proposals. I potied the suttoville Road
- access has to not only a nice bench but a
entry monument I suggest these me
incorporated at the Torin Road site, or if not,
the proposals for Florin Read and Sutterille are

Response 25:

Thank you for your comments. All aesthetics shown are preliminary and subject to change during final design. Any considered aesthetic treatments and/or landscaping will be incorporated into the project during final design in coordination with the City per Measure AES-3.

Comment 26: Susan Goodwin (December 6, 2018)

	DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD DEL RÍGEREDEL Public Information Meeting Thursday, December 6, 2018 Catholic Public review and comment is November 5, 2018 through January 3, 2019. Catholic Catholic Catholic Department of Public Works
	Name: Susan Good Win Address (Optional)
	Telephone (Optional):
	Organization (Optional): 10
	comment: Please consider the following:
A	1) add water Fountains along the trail
В	2) fix the "sidewalk" at Sutterville over 1.5
с	3) I have concerns about the impact of the proposed thail
	VLAG DAVKING ON THE DASCOALL AT DOOLEY HILD. Strut (sidewalk on one side of
D	4) Additional parking where the trail begins another to the Field behind
	Of Darnel and Riverside. 5) What barries i (Har Zon mine 2 the ine the trees on San mateo way.
E	J WHAT MAPPENS IFTUE 200 MOVES: We Issue with
	the train becomes mute.

Response 26A:

Thank you for your comments. The City will consider water fountains along the trail at locations where waterlines currently exist; however, no new waterlines for water fountains are proposed as part of the project.

Response 26B:

The project will provide a gap closure by constructing a new sidewalk along Sutterville Road from the railroad crossing to the existing sidewalk segments that ends shortly before the Riverside Boulevard on-ramp; however, no improvements are proposed over I-5 as part of the project. The City will consider your recommended sidewalk improvements at the I-5 overcrossing as a separate project, as that is currently outside of the Project Area Limits.

Response 26C:

Additional parking for the trail will be provided along San Mateo Way near the intersection of San Mateo Way and Riverside Boulevard. A connection to the baseball fields from the trail will be considered as part of the project during final design; however, it is not anticipated that the parking lot will create any additional safety concerns for individuals walking to and from the baseball fields.

Response 26D:

Additional parking for the trail will be provided along San Mateo Way near the intersection of San Mateo Way and Riverside Boulevard. The number of parking spaces provided at this location will be based upon the anticipated use of the trail corridor.

Response 26E:

The trail project is independent of any plans to relocate the Sacramento Zoo and is anticipated to be implemented regardless of any changes to the greater Land Park. The project is needed 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.

Comment 27: Cornelis Hakim (December 6, 20)18))
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	DRAFT ENVIRONIMIENTAL IMIPACT REPORT COMIMIENT CARD Public Information Meeting Thursday, December 6, 2018 Name: CORNELIS HACH Telephone (C Organization (Optional):			
Α	* Need to address drainage (FROM RUNOFF) FOR SECTION			
	BETWEEN 35th Au and Jensen Park. It shown that the bike pac			
	at the same level with THE TRACK. THE TRACK ITSELF IS Currently			
	2-3' above ground level. This ground level is the bottom of			
	EXISTING FENCE OF THE HOMES. Constructing the bike pad			
	on embauhment will block the neighborchood drainage.			
В	* Add"extra" signal approaching the bills pad at FRU, tridge			
	gong East.			

Response 27A:

Thank you for your comments. A Drainage Report will be prepared for the project which will determine the drainage design associated with the proposed project. The drainage design will will utilize topography data and flowlines to ensure all stormwater is properly drained to the appropriate facilities and will not block neighborhood drainage. The site's hydrology will be extensively reviewed prior to construction of the project.

Response 27B:

The trail crossing at Fruitridge Road will be signalized and is anticipated to include multiple warning signs for approaching vehicles.

Comment 28: Sarah Stratton (December 6, 2018)

	m v v STA	AHON 4 aMAKing
DRAFT ENVIRONMENTAL	DEL RIO TRAIL	SACRAMENTO
IMPACT REPORT	Design of the second se	Department of Public Works
COMMENT CARD	PROJECT	Department of Public Works
Public Information Meeting	The period for public review and comment is	
Thursday, December 6, 2018/	November 5, 2018 through January 2, 2010	
Name:Ara State	Address (Opt	Ŕ
Telephone (Op		U
Organization (Optional):	-ELDERAY Ulal	volate.
Comment: Dobpet to z	he plan to TAKE to	te comm.
dog Frail fr	mmey Commus	sity - I
Mesede near 4	Verherth & Del	Kiopd.
This is a beauti	toful area With	& treess
pature Walf	E FOR Denuras his	the dogs.
Solet to 7	A King out any	treesal
have such b	nown to file as	pealst
against rem	would of huritai	get rees
Pog Trai	l SBIRED JO NOT	NIX FORELACTI

Response 28:

Thank you for your comments. The trail will allow improved access for all users, including dog walkers, to travel for miles up and down the corridor to access William Land Park, the Sacramento Zoo, schools, stores, restaurants, retail centers, jobs and community parks.

The City is committed to protect in place, where feasible, all City or Private Protected Trees, as defined under Sacramento City Ordinance 2016-0026, Chapter 12.56 City and Private Protected Trees. Measures AES-1 included in the document ensures that the City follows this ordinance. 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 29: No Name (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD	DEL RIO TRAIL PROJECT	SACRAMENTO Department of Public Works
Public Information Meeting Thursday, December 6, 2018	The period for public review and comment is November 5, 2018 through January 3, 2019.	
Name:	Address (Optional):	
Telephone (Optional):		
Organization (Optional):	·····	
Comment: Uhy retain	a save the rail	road
tracts? Historica	I issue could be an	complished
by saving int a so	nall portion. I huve	not spoken
with me neighbor	in favor of retaining	the diminist
& tracks proposed.	- Historical import	ance is
very questimabl	e	

Response 29:

Thank you for your comments. The project is required to minimize impacts to the existing railroad in order to avoid adverse effects and comply with the Secretary of the Interior's Standards for Treatment of Historic Properties. Additionally, the project is anticipated to greatly reduce the cost of construction by maintaining the existing railroad tracks instead of removal of the tracks.

Comment 30: Mike Zellmer (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD DEL RÍGTRALL P ROJECT Caved SACRAMENTO Department of Public Works Public Information Meeting Thursday, December 6, 2018 The period for public review and comment is November 5, 2018 through January 3, 2019. Caved SACRAMENTO Department of Public Works
Name: MIKE ZELLMIER Address (Opt
Telephone (Option
Organization (Optional):
Comment: SOUTH OF FLORIN ROAD MOUTE TRAIL AS FAR
AS POSSIBLE AWAY FROM PROPERTY LINE
YOU ARE GETTING BETTER, BUT NOT
THERE YET.
THANK Yoe)

Response 30:

Thank you for your comments. The City understands your concerns regarding the proximity of the trail to your property line. Throughout final design, the trail alignment will continue to be refined to minimize impacts to adjacent property owners where feasible.

Comment 31: Lori Namba-Oto (December 6, 2018)

	DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD Public Information Meeting Thursday, December 6, 2018
	Name: Lori Namba-Oto Address (Optional):
	Telephone (Optional):
	Organization (Optional):
Α	comment: I strongly recommend that The construction
	begin in the South Area (rather than the North)
	for safety reasons primarily - The need is greater in The South I
В	- This project solicit cartherships with
	local presinesses to support and encourage
	use of the Del fis Thail Project, which will
	ampanetative main (sq. vardalian ileitering etc) due to

Response 31A:

Thank you for your comments. Construction of the trail is anticipated to be completed in approximately six months. The City is considering all construction phasing options and will select an appropriate strategy during final design. The construction details including the starting location will be determined during final design and in coordination with the selected contractor.

Response 31B:

The project has consulted with local stakeholders including businesses throughout the preliminary design and environmental documentation of the project. The City will continue to coordinate and solicit support from local businesses, private citizens, and other stakeholder grounds throughout project implementation. The City is aware that the presence of residents and daily users of the trail will be the greatest deterrent to crime and will continue to work with local stakeholders to ensure the trail is utilized.

Comment 32: No Name (December 6, 2018)

COMMENT CARD Public Information Meeting Thursday, December 6, 2018	PROJECT The period for public review and comment is November 5, 2018 through January 3, 2019.	SACRAMENTO Department of Public Works
Name:		
Telephone (Optional):		
Organization (Optional): Comment: THIS W EXTENSIO FOMELC	NOFTHE SS HIGHWAY	а

Response 32:

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.

Comment 33: Eric Janssen (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT	DEL RIO TRAIL	SACRAMENTO
COMMENT CARD	PROJECT	Department of Public Works
Public Information Meeting Thursday, December 6, 2018	The period for public review and comment is November 5, 2018 through January 3, 2019.	0
Name: ERIC JANSSEN	Address	
Telephone (Op		
Organization (Optional):	al i mald up for	and to id
	nt. I would prefer so	
	to be learned from at	0
	. Lung into Davis, also	
new buseball com	ler @ about 14th st 2,)	re tunnels
and water ingress?	we need to get more	commiting
	a decent solution and	
supportive. Thanks f		

Response 33:

Thank you for your comment. The Del Rio Trail will include at-grade crossings and intersection modifications at each location where the trail intersects a vehicular roadway. Neither grade separated or underground crossings are feasible for this project due to the extensive costs associated with such facilities as well as the expanded footprint requiring additional right-of-way, including acquisition of privately owned parcels.

Traffic control solutions have been studied and will be incorporated at road/trail crossings to provide a safe and efficient transportation facility for bicyclists, pedestrians, and vehicles.

Comment 34: Richard Mellies (December 6, 2018)

DRAFT ENVIRONMENTAL IMPACT REPORT COMMENT CARD	DEL RIO TRAIL	SACRAMENTO Department of Public Works	
Public Information Meeting Th	he period for public review and comment is lovember 5, 2018 through January 3, 2019.		
Name: RICHARD MELLIES	Address		
Telephone (Op			
Organization (Optional):			
Comment: THERE MUST BE LIN	JE OF SITE BLOCKAGE BE	FURER TRAIL	
AND DARNEL WAY, WHAT WILLSTOP HOMELESS FROMCAMPING AT THE			
BOTTOM OF THE LEVIE NOW THA	ATTHEY HAVE BE THE ACCESS.	CHAINLINK	
FENGE WOULD BE BESTIDES	4		

Response 34:

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 35: Arthur Bauer (January 3, 2019)

Tom Buford

From:	Arthur Bauer
Sent:	Thursday, January 3, 2019 3:03 PM
To:	Tom Buford
Subject:	Comments to the Draft Environmental Impact Report for the Del Rio Trail Project

January 3, 2019

Tom Buford, Manager of Environmental Planning Services

City of Sacramento Community Development Department

300 Richards Boulevard, Third Floor

Sacramento, CA 95811

Re: Comments to the Draft Environmental Impact Report for the Del Rio Trail Project

Dear Mr. Buford:

I wish to inform you that the comments of the California State Railroad Museum represent my comments as well. However, I would like to add some additional thoughts.

California law, supported by numerous court decisions, requires a through analysis of the issues and impacts of a proposed project. The reason for this emphasis is decision-makers, in this case the Sacramento City Council, and the public must be informed of all aspects of the potential impacts of a project. This ensures informed decision-making by the council. The importance of protecting the rails in all locations in order to operate an excursion train, is not considered. Without a thorough analysis of the excursion train concept and its relationship to historic nature of the railroad right-of-way, fails to fully inform the council of the project's impact. Any attempt to shade the analysis toward a particular outcome is unprofessional and not tolerated by the courts. I, therefore, encourage you and your consultants to thoroughly analyzed the issues raised by the Foundation and analysis the relationship of a fully operable excursion train with the proposed trail.

Arthur E, Bauer

Response 35:

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 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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.

Please see Comment 7 for all responses to the California State Railroad Museum comments.

Comment 36: Arthur Fluter

Tom Buford

From:	Arthur Fluter	
Sent:	Thursday, January 3, 2019 12:13 PM	
To:	Tom Buford	
Subject:	Personal Comments on the Del Rio Trail DEIR and Its Econoimic Defects	
Attachments:	2015-0700, Sacramento Placerville Transportation Corridor Alternative Analysis, 55 pgs.pdf;	
	2012-0300, Adirondack Scenie Railroad, Regional Economic Analysis, 25 pgs.pdf; Del Rio Trail DEIR	
	Letter to Buford, Economic Benefits, 2019-0103.pdf	

From:

Arthur Fluter

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

Via Email To: tbuford@cityofsacramento.org

Re: The Del Rio Trail Draft EIR (DEIR) is missing an economic analysis on the benefits of allowing excursion service on the tracks in the former RT Corridior

Mr. Buford:

Α

The DEIR is deficient in that it did not address the:

Actual economic benefits the CSRM and the SSRR currently provide to the City and the region.
 The potential economic opportunities and benefits an expanded SSRR excursion train service to the south and ultimately to Hood would provide to the City and the region.

The City of Sacramento is irresponsible and clearly anti-rail in ignoring these benefits. The actions of the City are even more suspect compared to the pro-rail actions of multiple cities across the US and here in California. These areas are actively attracting heritage railroads, and rightfully seeing them as economic engines to help develop their area.

Benefits of the Current Operation of the CSRM and the SSRR

The next version of the EIR must address the economic benefits that the combination of the California State Railroad Museum (CSRM) and the Sacramento Southern Railroad (SSRR) provide to the City and the region.

Sacramento started as a rail centric town in the 1860s. That process continued and expanded when the CSRM was created in the 1970s. It continued when volunteers established the operational SSRR in the 1980s. It is going to continue with the renovation of the SP Shops in the Rail Yards. - "How many tourists come to Sacramento for railroad culture?"

The CSRM has over 300,000 visitors every year. It has the ONLY Travelocity 5-Star attraction in the Sacramento area. The SSRR routinely has over 20,000 riders in the Spring and Summer. The Polar Express Christmas trains have another 24,000 riders. The Polar Express tickets sell out in less than a week. All of those riders come to Sacramento for the trains, and they buy parking, food, gas, and souvenirs. They stay in hotels. Enchanted by the ambiance of Sacramento and Old Town, many extend their visit to other attractions, and spend the night in local hotels.

- How many tourists will come to Sacramento to ride a bike path?
- How many will come from out of town?
- How much money will then spend?
- Some estimates put trail use as over 60% locals, and only 40% from out of town.

The Del Rio Trail EIR is Culturally, Fiducially, and Economically Wrong

The approach the City is taking with the Del Rio Trail is both culturally and fiducially wrong and misguided. From a cultural point of view, the City plans to wantonly destroy a piece of California cultural history; a history that literally created Sacramento. This history is owned by all Californian's, but is going to be destroyed for the pleasure of a few rich and powerful Sacramento residents.

From a fiduciary point of view, the City's approach to the Del Rio Trail is even more puzzling. The "pull-therails" approach dismisses, and then destroys for all time the economic opportunities a longer distance Sacramento Southern Railroad would provide to Sacramento-area businesses and citizens. - "Trail conversion cannot easily or inexpensively be reverted back to rail use if the benefits do not materialize, and would be a page inexpensively be reverted back to rail use if the benefits do not materialize,

and would be a near-irreversible decision within any person's lifetime."

This "pull-the-rails" (or "no trains—ever" or "bury-the-rails-for-all-time") approach by the City is even more puzzling and suspect compared to cities and regions across the U.S. that are actively investing in attracting, funding, and helping excursion railroads to become the center magnetic attraction for a tourist destination. - "An operating excursion railroad becomes the "anchor store" for a regional "mall" tourist attractions. - Once the "railroad anchor store" is in place, it becomes a magnetic force that first attracts tourists. These then attract businesses to supply the needs of those tourists."

The City of Sacramento is Missing an Economic Benefits Engine

The City of Sacramento is behind the times in appreciating the economic potential of expanded SSRR excursion trains. For a local example, go no further than the Sacramento Placerville Transportation Corridor Joint Powers Authority (SPTC-JPA). It was formed to provide for the acquisition and preservation of the Southern Pacific Transportation Company's (SP's) Placerville Branch railroad, and to provide reciprocal use agreements for transportation and transportation preservation uses as may be desired by the SPTC-JPA's Member agencies. The SPTC-JPA is a public entity originally formed in 1991 with the goal to purchase 53 miles of the Placervile Branch right of way from Southern Pacific (SP).

- "A \$210,000 study commissioned by El Dorado County in 2015 showed that excursion trains and a paved trail combined could generate up to \$12.6 million in net economic benefit every year with up to 50,000 train passengers versus only \$300K of annual economic benefit from 20,000 combined rail/trail users with motorcar-only excursions and a natural trail."

 Somehow, the City of Sacramento has missed this key concept and wants to deny these potential economic benefits to its businesses and citizens and tourists. Forever.

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Think about it. The SSRR running on WGBL tracks as far as Hood, over 30 miles of train travel. There could be dinner trains, wine trains. Trains to take rafters and bikers and walkers up and down the river. But the City wants to kill forever this next phase in our development with the rail-less Del Rio Trail.

"The Del Rio Trail right-of-way along the former RT corridor is the four-mile access line that allows the SSRR's northern tracks to connect with the southern tracks to the south starting at Meadowview."

Benefits from other Heritage and Excursion Railroads in the U.S.

A cost/benefit analysis should be done by the City to determine how continuing the SSRR south to Hood would benefit all the stakeholders.

Railroads helped invent modern tourism. Railroads populated the great National Parks with guests. Today, the heritage of these railroads provides a different kind of engine, delivering visitors and tourism revenue to those communities wise enough to mine the totality of the railway heritage tourist experience.

Because the DEIR and the City HAVE NOT done this analysis, below are cost/benefit examples from several excursion and heritage railroads around the country. The City should use these examples to formulate research to determine the true benefits of the SSRR/WGBL.

The Takeaways from Heritage Railroad Case Histories

After reviewing the activities of heritage and excursion railroads and the cities they are located in, the following key points and conclusions should be noted by the City of Sacramento in the next EIR.

Our vision

We believe in the power of our communities to use the treasures of their past to secure a better future.

Unique historical assets create unique tourist destinations

 Capitalizing on heritage and catalyzing its development potential through reinforcing its geographic and psychological connectivity in this way is consistent with the policies of Pennsylvania's Department of Conservation and Natural Resources and Department of Community and Economic Development to create destinations by utilizing unique historic assets.

Rails attract tourists and revenue

The railroad provides an aesthetic and cultural context for new business growth.

 Through telling our local story though an engaging and unique experience, we build a reputation that businesses can build on.

 The railroad is the "anchor store" for the "mall" of regional attractions. The "mall" then fills with other tourist services. The unique collection of attractions and services attracts tourists for a unique sense of place for family-oriented activities and experiences.

- Tourist railroads are the armature of connecting—literally and figuratively—the assets of a region such that the sum is greater than the individual parts. Capitalizing on the train's ability to be a memory-making device, the railroad becomes the anchor attraction to the benefit of other attractions and businesses.

 Heritage tourist railroads are well-proven as regional economic drivers. These projects, funded with state, local and private monies, have been able to give back to the community tenfold and have been self sustaining and successful once up and operating.

 Heritage and excursion railroads create million of dollars in economic benefit for their communities and surroundings.

A heritage railroad is a sustainable source of revenue.

 Economic impacts are not limited to estimates of visitors and what they may spend, but also determined by the very real – and historically proven – business expenditures that keep the operation going.

Е

Rail excursions

G

- A train excursion is a point of interest, and it can result in additional visitors and revenue.

- The basic attraction of a train ride is more time-related than distance-related, and can best be compared to the time factor allowed for a similar family-based activity.

Excursion trains benefit distant destinations

 Increased rail travel distance allows creation of additional excursions and services such as bike train, or raft and kayak train. Trains that stop in distant attractions such as historic towns generate revenue for those locations.

Rail tourists are affluent tourists

 Rail tourists are well educated, with most holding advanced degrees. "Education level is the single most significant factor that influences cultural and heritage participation and travel.

 Rail tourists are older, peaking between the ages of 45 and 65, when people are at the height of their careers, earning power, and discretionary income.

Rail tourists are generous in spending, averaging \$62 more per day than other visitors. And they spend on a
more diverse array of goods and services.

- Rail tourists are more likely to stay overnight in hotels and bed-and-breakfasts.

Rail tourists are more inclined to stay longer than the average traveler.

- Rail tourists are more likely to visit a diversity of sites, cities, and regions than the average traveler.

 Rail tourists, and tourists in general, are in search of high-quality services, authentic experiences, and easyto-do, accessible quality travel that combines education and entertainment.

 Rail tourists are influenced by women. Women typically plan family vacations and group trips, and also control more personal discretionary income.

Rail tourists are from out-of-town

Typically, railroad visitors are over 60% from out of town, while trail users are predominately local people.

Special Event Trains

- People want to see special-event trains, a special-event experience that involve a train.

 Special event trains are most often those that sell out. The SSRR Polar Express sells out 24,000 tickets in less than a week.

A combination of routine excursions with big time special events such as Polar Express provides full
operation with operating funds.

- Local celebrations can increase the benefit return to local community.

 Regular passenger excursions with special event train excursions appear to be the key to a successful heritage railroad.

The two biggest special event trains are the Day Out With Thomas and the Polar Express.

Use of Volunteers

 Significant additional benefits for excursion trains are accrued when the number of operating volunteers increases.

- Volunteers reduce or eliminate costs associated with payroll.
- The CSRM and SSRR use over 500 trained docents and train operatators.

- Knowledgeable trained volunteers provide increased value for the public.

 Routine right-of-way maintenance can be accomplished by volunteers, even working with vintage (old) equipment.

- Routine operational crews can be staffed with well trained volunteers.

- All of the SSRR operational staff and crews are trained volunteers.
- Volunteers contribute to local economy by purchasing food, gas, and in some cases,



Rail-only, or trail-only, or rail-with-trail

- The future is unknown. The future needs for a rail corridor are unknown.
- A rails-with-trail solution protects that future.

- Trail conversion cannot easily or inexpensively be reverted back to rail use if the benefits do not materialize, and would be a near-irreversible decision within any person's lifetime.

Partnerships Benefit All Stakeholders

 Partnerships between rail and other transportation modes such as bikes and walkers benefits all stakeholders.

Sacramento Rail is a world class attraction

- The SSRR railroad is a world class attraction. A trail-only solution is a local attraction. No one will travel here just to ride the Del Rio Trail.

The economic impacts of any choice can be legitimately compared between alternatives, but in the end
analysis, would best be encouraged to those that operate without necessarily excluding the other by default.

Sincerely,

Arthur L. Fluter

Attachments:

- This letter, formatted as a PDF with a listing of selected heritage/excursion railway development across the US

- Example of economic benefit analysis done for the Adirondack Scenic Railroad in 2013.

- The 2015 Sacramento Placerville Transportation Corridor Alternative Analysis.

ADIRONDACK SCENIC RAILROAD

North Country Regional Economic Impact Analysis

2011 Operating Season including Utica-Lake Placid Projections



Sponsored by: North Country Chamber of Commerce, Mohawk Valley Chamber of Commerce & Oneida County Visitors Bureau Endorsed by:

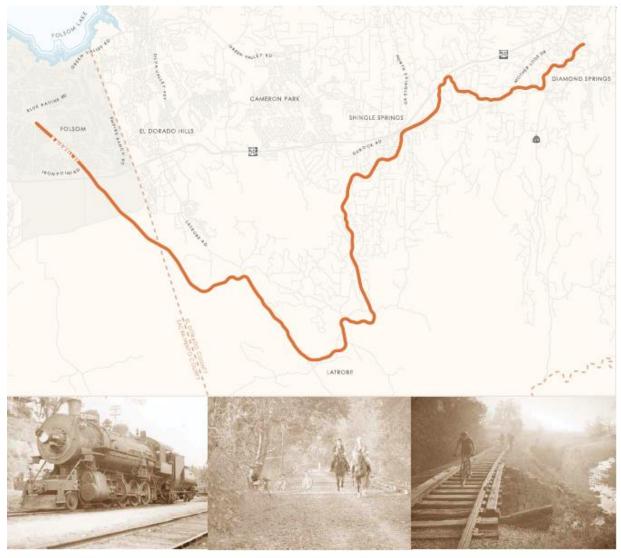
Saranac Lake Area Chamber of Commerce, Tupper Lake Chamber of Commerce & Adirondack North Country Association

Prepared by:

Stone Consulting, Inc. 324 Pennsylvania Avenue West P.O. Box 306 Warren PA 16365 (814) 726-9870 tel (814) 726-9855 fax

March 2012

Due to the size of the file, the entirety of this document is not included. The full document can be found at <u>www.adirondackrr.com/adkrr/wp-content/uploads/2016/03/economicImpact-3.pdf</u>.



SACRAMENTO PLACERVILLE TRANSPORTATION CORRIDOR ALTERNATIVES ANALYSIS





Made possible by a Federal Highway Administration Partnership Planning Grant

Due to the size of the file, the entirety of this document is not included. The full document can be found at

 $\frac{https://static1.squarespace.com/static/5a94975445776eaaf7fe13f6/t/5aa1c5d1ec212dd5d7e5ae62/1520551440170/SPTC+Study.pdf.$

Response 36A:

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: <u>http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf</u>

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.

Response 36B:

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 36C:

See Response 36A.

Response 36D:

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. Maximizing economic benefits is not a project goal and is therefore not discussed in detail in this EIR.

Response 36E:

See Response 36B.

Response 36F:

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 is not a project goal and is therefore not discussed in detail in this EIR.

Response 36G:

See Responses 36A, 36D, and 36F.

Response 36H:

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. See Response 36A for more information on where excursion trains are planned to operate in the future.

Comment 37: Brian Ebbert (January 3, 2019)

January 3, 2019

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

Sent via email: tbuford@cityofsacramento.org

Re: Del Rio Trail Draft EIR

Dear Mr. Buford:

I am a South Land Park resident and I support the City's drafted EIR for the Del Rio Trail project. Tens of thousands of residents in the Sacramento region will gain improved, safe access to services, commercial districts, parks, and schools.

My only concern to raise at this time is the <u>potential</u> loss of homeowner privacy on the narrow section of trail in the East Land Park Subdivision (14th Street-Park Village Street corridor). When the City enters its final design phase, planners should find ways to minimize loss of privacy by limiting pruning and shrub removal, and/or finding other ways to maintain the current baseline level of privacy for residents.

Although no project is perfect and every plan can be improved, this Draft EIR shows that the City's project team went to great lengths to accommodate a wide range of stakeholders while protecting the environment as required by the law.

Sincerely,

Brian Ebbert

Response 37:

Thank you for your comment. 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 38: Cornelis Hakim (January 3, 2019)

Tom Buford

From:	Cornelis Hakim	
Sent:	Thursday, January 3, 2019 4:42 PM	
To:	Tom Buford	
Cc:	'Brian Ebbert';	
Subject:	Del Rio Trail DEIR (K15165100) Comment for the Typical Section between Shady Park Ct and 35th	
	Street	
Attachments:	DelRioTrail XSec Shady to 35th.pdf	

Dear Mr. Buford,

Thank you for the public meeting on the Del Rio trail project. I hope the following information can help this project to move forward with less cost and impact.

This comment regards the section between Shady Park Court and 35th Street. Attached are 2 pages of Exhibits that show the typical section between Shady Park Court and 35th Street.

Typical Section (mostly approx. scale 1':50")

- X1: The exiting condition of the proposed Del Rio trail
- X2: The proposed trail by the city with possible problems labeled P1 thru P7
- X3: Suggested modification

After looking carefully into the proposed typical section, here are some of the difficulties I noticed (Please use the attached Exhibits 1&2 for visual):

- P1: Reflective Cracking; Adding a new thin layer of asphaltic concrete (AC) on top of the edge lines
 of rail road ties will create a constant reflective cracking 18" away from the track. This will reduce the
 usable 12' width of the bike lane and create a nuisance weed growing line.
- P2: During the wet season, this area will have accumulation of water that may drain to the adjacent property.
- P3: Problematic access for utility (Sewer and Water), trash and debris accumulation
- P4: The neighborhood has a privacy concern of the likelihood that bike rider will now visible from the back yard.
- P5: The proposed design will need to haul in and construct fill.
- P6: New import/constructed aggregate base (AB)
- P7: Most of the existing fence post will be rotted

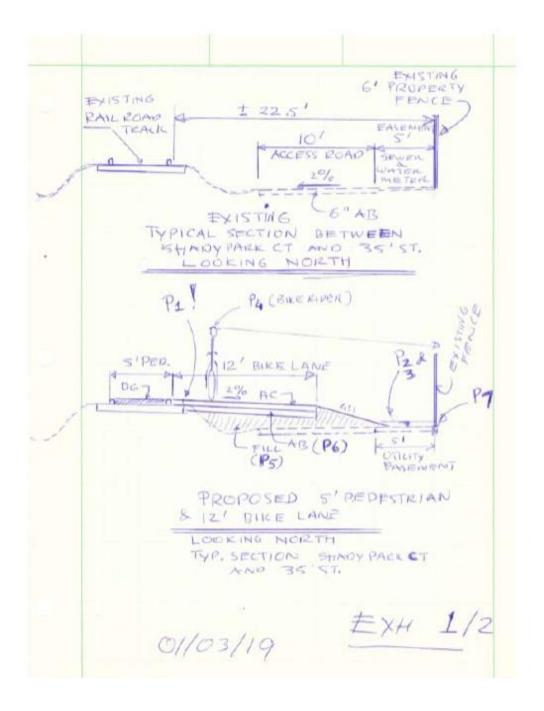
Some benefits of the suggested modification X3:

- 1. Concern P1, P2, P3, P5, P6 and P7 are eliminated
- Concern P4 only when pedestrian utilize the pedestrian trail. This issue was not addressed in the Visual Impact Assessment report

I appreciate the opportunity to comment, and please don't hesitate to contact me if you have any questions.

Sincerely,

Cornelis Hakim



PENCE 12 BIKE LANE SIPED. PG NEW a de de -5 14-FALLTING ROCK LOL NOL (REUSIE) NEW AI SUCCESTION NO 1 LOOKING NORTH TYPICAL SECTION BETWEEN SHADY PARK CT & 3534. EXH 2/2 01/03/19

Response 38:

Thank you for your comment. The placement of the trail between Shady Park Court and 35th Street was determined based on property owner interest to keep the trail as far away as feasible from fences along the east side of the corridor and to keep the trail close to the walking path. 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.

Comment 39: Eric Baugher (December 31, 2018)

From: Eric Baugher Date: Mon, Dec 31, 2018 at 6:18 AM Subject: Del Rio Trail, comment on DEIR To: Meagan Luevano <<u>meagan@lucycompanypr.com</u>>

I was very disappointed with the FOE portion of the draft EIR

The claim is that the proposed trail will have "No Adverse Effect" on the historic property. But the FOE does not correctly identify all the the historically significant features and defining characteristics of the historic property. This is the root of the weakness of the argument.

There is a long list I can think of historic characteristics, including defining characteristics myself, but I think it prudent not to mention all of them in this little note. Hopefully when this goes to court as it is almost certain to do the Sacramento Southern Railroad can point out more historically significant features to its hearts content by me pointing out absence of significant characteristics out now.

In my opinion the proposed trail will have a huge effect on the "Design Integrity" of the historic property. The Sacramento Southern Railroad is a linear property, and destroying just a small section of it would destroy its design integrity in a non-reversible manner.

The DEIR sounds like it has been written by someone who does not know the first thing about railroading, and hence does not even understand what the delta railroad treasure they want to destroy is.

For example the report says that the railroad has "Standard gauge rails". It also says it has "Gravel". The third is wooden ties. So they got one feature correct out of the three they name, but the first two as any railroader knows are incorrect.

Worst of all is the proposal to bulldoze the levee in two different places making it impossible to ever operate a train again in two different places. They also want to tear down a beautiful historic trestle that I went to inspect for myself. It does not seen to have much burn damage at all. This despite the fact that the levees are specifically mentioned as an important feature that qualified the railroad for the historic register to begin with. So the FOE violates even its own stated rubric.

Also I think I should mention that Jesse Gothan has publicly threatened to report public commenters to the police.

In conclusion, I guess that the good people of South Land Park have so much money and political power that I guess that they think they can do what ever they want. If they have their way it will break my heart.

I don't really know why I bothered to comment. I don't want you people to think that I am so stupid that I don't realize that nobody cares what I think.

Eric Baugher

Response 39:

Thank you for your comment. 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.

Comment 40: Michael Greer (January 2, 2019)

Tom Buford

From:	Michael Greer <ig< th=""></ig<>	
Sent:	Wednesday, January 2, 2019 4:21 PM	
To:	Tom Buford	
Cc:	Art Fluter	
Subject:	Sacramento Rail Presentation	

rail

Michael. L. Greer



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

Mr. Buford:

As a life long resident of the Sacrament area, a railroad historian and a 27 year docent at the California Railroad Museum, am gravely concerned that the Draft EIR (DEIR) for the proposed Del Rio Trail (DRT) is incomplete, inaccurate, and is clearly anti-rail.



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.

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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.

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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.

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. This incorrect and deceptive document must be corrected in the next version of the EIR. Include the value of a fully intact WGBL. Include the necessary mitigation value of a rails-with-trails solution.

Please know that removing the rails and road bed will deprive many persons in the future from experiencing this historic road and the natural beauty these rails will provide long after we are gone.

Sincerely,

Michael L. Greer

Response 40A:

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 40B:

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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Response 40C:

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 40D:

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 41: Paul Ashley Helman (January 3, 2019)

Paul Ashley Helman

January 3, 2019

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

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

Dear Mr. Buford,

Please find below my comments on the Draft EIR for the Del Rio Trail Project. I have carefully reviewed the Areas of Controversy and general topics contained in the DEIR. Comments will focus on the adequacy and completeness of the Del Rio Trail DEIR dated November 2018. The comments will center on the potential impacts, the level of severity, the mitigation measures being proposed and project alternatives being considered.

The summary of Potential Impact and Proposed Mitigations, pages xxvii-xxxi is in error as several statements concerning various listed impacts are understated. This comment record will detail those errors and correctly state the impacts. From these correctly stated impacts this comment record will propose improved and enhanced mitigation measures.

One significant issue with the potential impacts and proposed mitigations is due to the limited alternatives considered. One important alternative mentioned extremely early in the public comment process was not considered and must now be included for the DEIR to be complete. The DEIR reports that at the public meeting held April 22, 2015, attendees stated a preference for a "Rails with Trails" project. The alternatives considered in this DEIR do not contemplate a "Rails with Trails" project. This is a major omission and needs to be remedied before the DEIR becomes final.

In reviewing the "Effects determined to be Significantly important" the following impacts and mitigations are detailed to show inadequacy and incompleteness.

Summary of Inadequacies and Incompleteness in Effects determined to be Significantly important

Comments contained in this letter will show that the findings associated with these Impacts are inadequate and incomplete and incorrect which result in inadequate mitigations.

Potential Impacts	Impact Studied	Necessary or potential finding
Aesthetics and Visual Resources	AES-3	Significant Unmitigated Impact
Cultural Resources	CUL-1	Significant Unmitigated Impact
Hazards and Hazardous Materials	HAZ-2	Further studies needed to determine

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Land Use and Planning	LAND-2	Less than Significant with
		Mitigation Incorporated
Population and Housing	Incomplete as	Less than Significant with
	not fully studied	Mitigation Incorporated
Recreation	REC-4	Less than Significant with
		Mitigation Incorporated

Aesthetics and Visual Resources:

The "Level of Significance" ascribed to Impact AES-3 is understated and inadequately compares the effects of the proposed Project to the environmental setting. Impact AES-3 is defined as the potential to substantially degrade the existing visual character or quality of the site and its surroundings.

This impact was found to be "Less than Significant with Mitigation Incorporated"

This finding is inadequate since the total significance of the project was not fully studied in the aspect of "Viewers and Viewer Response". The significant changes to the roadway crossings proposed by the project will be visible and noticed by Roadway Users (and other viewers not identified, such as pedestrians and tourists). The "Visual Impact" of these changes, the removal of functional track at crossings and repurposing of track to pedestrian walkway, will be negative and must be found as a "Significant Unmitigated Impact".

The "Significant Unmitigated Impact" is supported by reviewing one goal of the City of Sacramento (2035) General Plan 2015, found in the Regulatory Framework, Local, of section 2.1.

The goal to review is Goal LU 2.4 City of Distinctive and Memorable Places. This goal includes two policies:

Policy LU 2.4.1 Unique Sense of Place. The City shall promote quality site, architectural and landscape designs that incorporate those qualities and characteristics that make the City of Sacramento desirable and memorable, including walkable blocks, distinctive parks and open spaces, tree-lined streets, and varied architectural styles.

Policy LU 2.4.2 Responsiveness to Context. The City shall promote building designs that respect and respond to the local context, including use of local materials, responsiveness to the City of Sacramento's climate, and in consideration of the cultural and historic context of the City's neighborhoods and centers.

The finding of "Significant Unmitigated Impact" comes from a review of these two policies. The removal of functional track at crossings and repurposing of track to pedestrian walkway does not support the policy of Sacramento having a Unique Sense of Place and is a violation of Policy LU 2.4.1. Sacramento is well known for its agricultural and railroading history. The DEIR fully explains the memorable and historical history of the Walnut Grove branch railroad line. Removal of any aspect of this historic local and regional resource is negative to having a unique sense of place and is significant. The Walnut Grove branch was an integral part of bringing Sacramento Delta agricultural products to shipping points thus allowing for the economic success of delta farm families. The Walnut Grove branch is a part of Sacramento region neighborhoods and represents a unique context to demonstrate Sacramento's history. Removal of track, as detailed in the DEIR is

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thus a violation of Policy LU 2.4.2. The project, as described, does not promote a design that responds to the full local context.

The proposed mitigation is inadequate since it does not provide any aesthetic solution for the removal of track at crossings and the visual impact therein.

There are two other aesthetic aspects of the Project that are inadequately analyzed and must be further studied before the DEIR is finalized.

The notion that the track needs to be removed at pedestrian and bicycle intersections for safety purposes belies the current number of Sacramento Rapid Transit District and Union Pacific Railroad bicycle and pedestrian crossings in the Sacramento area. The statements regarding improved safety by removing rail at intersections is contradicted by the safe use of Sacramento Rapid Transit district and Union Pacific Railroad crossings every day and almost every hour in Sacramento. It has been well demonstrated that with proper design and installation pedestrians and cyclist can safely cross railroad tracks.

Lastly it is fully against common sense to propose a pedestrian trail between the two rails of a railroad track. One need only remember the admonition given by one's parents when sent out to play, "Have a good time but don't play around Railroad tracks". Proposing a pedestrian trail to be used by youth that is between two rails goes against the parental wisdom of many generations.

The DEIR states that the required mitigation is AES 1, AES 3 and AES 4. These are inadequate as they deal with trees and landscaping and do not address the issues that make this impact significant.

Proposed mitigation for AES-3 is to upgrade pedestrian and bicycle intersections to current or better than current standards to improve safety. A further mitigation is a Project redesign to eliminate any trail that is between two rails.

Cultural Resources and Tribal Cultural Resources:

The "Level of Significance" ascribed to Impact CUL-1 is understated and inadequately compares the effects of the proposed Project to the environmental setting. Impact CUL-1 is defined as the potential to cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

According to 36 CFR 800.5(a)(1), an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

This impact was found to be "Less than Significant with Mitigation Incorporated".

This finding is inadequate and significantly incomplete since the documentation supplied in the DEIR does not show how this impact was determined, the finding clearly does not understand the established criteria and lastly does not definitively state who actually provided the "Finding of No Adverse Effect" which is the basis of the Less than Significant with Mitigation Incorporated.

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The Project may not affect any characteristic that qualifies this Walnut Grove branch for inclusion in the NRHP. The DEIR fully describes the aspects of the Walnut Grove branch that qualify it for inclusion in the NRHP. The Project may not alter any characteristic of the Walnut Grove branch that diminishes the integrity of the rail line's feeling or association per the above statement quoting 36 CFR 800.5(a)(1).

The characteristic of **Feeling** is explained as the physical integrity of the resource that helps it to convey a sense of time and place and evokes the feeling of an early twentieth-century railroad segment.

The DEIR finding of Less than Significant is inadequate since it misjudges the feeling of an early twentieth-century railroad that does not have in place rails at crossings. Looking at a historic rail line that has no rails in road crossings would create an incomplete sense of time and place and a feeling of "something is wrong here". This would cause the viewer to wonder "How did this work?" and then figure that the integrity of the rail line was affected. The rails cannot be removed per this required NRHP characteristic.

The characteristic of Association is explained as the feeling of association is intact, as the resource retains sufficient physical integrity to convey its associative significance under Criterion A and Criterion C.

The DEIR finding of Less than Significant is inadequate since it misjudges the intactness of the feeling of association of an early twentieth-century railroad that does not have in place rails at crossings. Removal of rails at crossings will not convey a sufficient enough physical integrity to satisfy Criterion A where the property has made a major contribution to American History. The Walnut Grove branch was historic and made major contributions by being the transportation conduit to the agriculturally rich and diverse Sacramento Delta region. Generations of Americans benefited from the agricultural output of this region which supported not only the supply of food to the entire country but was the economic mainstay of many delta families and farms.

Viewing the Walnut Grove branch without rails at street crossings would cause an incomplete association as little or no aspect of the historic resource would be visible. There would be no association and this is a violation of this criteria.

These two impacts of the Project on the Walnut Grove branch point to the incompleteness of the DEIR and the inadequacies of the analysis. The finding of Less than Significant is incorrect.

The DEIR, page 150, states, that "The CSO concurred on October 23, 2018 that a Finding of No Adverse Effect with Standard Conditions through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties would be appropriate. See Appendix G for the CSO concurrence letter "(CSO being the Cultural Studies Office of the California Department of Transportation, Caltrans).

Appendix G is a disturbing set of 3 e-mails:

The first e-mail is a query about what is the status of the CSO review as it was then due.

The second e-mail is from the CSO and states the CSO has finished the review and has *no objection* to the Finding of No Adverse Effect with Standard Conditions- SOIS for the Del Rio Trail Project.

The third e-mail says see below for CSO approval of the NAE-SC-SOIS finding.

This set of e-mails is disturbing because of the change in language and meaning stated in the DEIR versus the CSO letter. The CSO is merely stating it has *no objection* to the finding. This indicates the finding was done *by others*, they reviewed it and found *nothing to object to*. The DEIR inadequately twists this to a different meaning and states this as CSO approval. Finding nothing to object to is not the same as an approval of something of this importance. This is an inadequate statement and cannot be used to construe approval. Thus, this finding is inadequate for this reason alone.

The DEIR states the Secretary of the Interior's Standards for the Treatment of Historic Properties applies to this type of Project. It is not stated in the DEIR as to why this project is subject to this standard and is a reason to label this DEIR as incomplete.

In reviewing the application of these standards to this project several inadequacies are evident.

Standard #1 states: A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

The Project violates this standard because of the significant change at pedestrian and bicycle interchanges and grade crossings by the removal of rail. The DEIR is inadequate in that it does not include an alternative to using the Walnut Grove branch line that matches its historic purpose. It is also incomplete in stating the need to improve safety by removing the rail. It has been mentioned before and will be repeated here, there are a significant number of examples in the Sacramento region where pedestrian and bicycle crossing a rail is done safely on an on-going basis. The DEIR is incomplete since no solution of safe crossing, as done everywhere else in Sacramento, is presented that keep the historic rails in place.

Standard # 2 states: The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

The DEIR is inadequate in that rail is removed and not preserved per this standard. The standard clearly states that removal of historic materials shall be avoided. The reason given for track removal, safety reasons, is incomplete in that, as stated above, a large number of railroad tracks in the Sacramento area are crossed safety 1000's of times a day by pedestrians and bicycles. The finding is incomplete in that no design solution is proposed to fully retain the historic rail of the Walnut Grove branch track

Standard #3 states: Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

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The Project violates this standard in that the space between the rails and above the wooden ties will be filled with a walking track. The fill and track are not historic and will created a false sense of historical development. It will appear to the public that walking on tracks is acceptable. The standard clearly states that adding conjectural features shall not be undertaken.

Standard # 9 states: New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

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The Project violates this standard two ways. First it destroys historic material in the removal of rail at crossings and the crossings are an integral part of the Walnut Grove branch line. It is unclear h ow the rail and associated hardware will be removed with no destruction of material. Additionally, the fill between the rails and on the ties will hasten the deterioration of the historic property due to water retention. The standard clearly states that new additions and exterior alterations shall not destroy historic materials.

The Project contemplates compliance with Rehabilitation Standards via the "Action Plan" shown as Table 10 on page 148. This plan is inadequate and incomplete for several reasons. First, this is simply an engineering-construction action plan that shows the progression of work. Though a good conceptual project execution strategy it does not address the inadequacies of the project the plan is intended to build. The plan suggests further plans will be made and reviewed. However, the review will be against the inadequate and incomplete findings contained in this DEIR. This action plan cannot be accepted until the Project's inadequacy and incompleteness is addressed.

Due to the above discussion of inadequacy and incompleteness the DEIR finding of "Less than Significant with Mitigation Incorporated" needs to be changed to "Significant Unmitigated Impact". Adherence to the given standards as criteria are simply not met with removal of rails and safety can be met, as it is all over Sacramento, by application of applicable design standards.

The stated Mitigation Required, CR-1, is basically to follow the Action Plan of Table 10. Since this plan is in itself inadequate and incomplete, so is mitigation CR-1. The proposed mitigation to meet the relevant standards for Cultural impacts is to leave the rail in place, adopt an alternative for "Rails and Trails" plus utilize modern and readily available design standards for pedestrian and bicycle rail crossings.

Hazards and Hazardous Materials:

The "Level of Significance" ascribed to Impact HAZ-2 is understated and inadequately compares the effects of the proposed Project to the environmental setting. Impact HAZ-2 is defined as the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

This impact was found to be "Less than Significant with Mitigation Incorporated"

This finding is inadequate and incomplete since soil sample B2-05 was reported to have an elevated Arsenic level of 21 mg/kg. Sample B2-05 is 62% higher than the next highest sample, B8-05

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showing 13 mg/kg. B2-05 is also 10 times higher than the lowest reported Arsenic concentration of 2.1 mg/kg at sample B4-05. It is also noteworthy that ballast sample B2a shows an Arsenic level 46% higher than the next highest ballast test. This indicates a concentration of Arsenic at test location 2 that must be further studied before any mitigation is agreed upon.

There is no reason to believe that a testing plan testing a sample every half mile found the absolute highest concentration of any one chemical. However, this type of testing plan can be used to determine where further testing should be conducted. This level of Arsenic in one sample is indicative of heaver concentrations near this test site and further tests must be done to determine if Arsenic is higher, or not, just 10 feet away or 50 feet or some other statistically calculated distance. Once this further testing determines the extent (or not) of this material the proposed mitigation may need to be heavily modified to continue with the finding of Less than Significant with Mitigation Incorporated.

GEOCON, the consultant conducting the Hazardous Material Study stated this in their Conclusions and Recommendations:

"The reported arsenic concentrations are within the range of naturally occurring concentrations with the exception of arsenic in the soil sample from location B2 which was slightly elevated at a concentration of 21 mg/kg. Outlier concentrations are not uncommon and do not necessarily suggest a contaminant impact. However, a regulatory agency could request further assessment of soil in this area."

Mitigation HAZ-1 in inadequate and incomplete in that it addresses only materials brought onto the construction site not hazardous materials found on or in the construction area. Based on the necessary resample this mitigation may need to be heavily modified to contain elevated levels of Arsenic and any other material found to be elevated through the follow up soil sampling.

Land Use and Planning

The "Level of Significance" ascribed to Impact LAND-2 is understated and inadequately compares the effects of the proposed Project to the environmental setting. Impact LAND-2 is defined as the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

This impact was found to be "No Impact".

The City of Sacramento 2035 General Master Plan, Goal LU 9.1 Open Space, Parks, and Recreation is intended to protect open space for its recreational, agricultural, safety, and environmental value and provide adequate parks and open space areas throughout the city. The Old Sacramento State Historic Park Master plan includes property that is included in the Project boundaries and scope. This property is currently used by a unit of the Old Sacramento State Historic Park for recreational purposes that help explain and interpret the historic nature of the railroad background of the Project. The effects of the Project on the recreational and historic programs must be studied and any impacts mitigated.

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This finding is inadequate since the effects of this project on the California State Parks Master Plan for Old Sacramento State Historic Park were not studied. This is a master plan adopted by the State, currently in use and must be fully incorporated into the Project. This has not been done and must be for Impact LAND-2 to be considered complete.

Potential impacts on elements of the Old Sacramento State Historic Park Master Plan could potentially create a finding of "Less than Significant with Mitigation Incorporated". Only through the necessary future study will any impacts be determined and mitigations proposed. Until then Impact LAND-2 is inadequate and incomplete.

Population and Housing

This DEIR section contained the following portion of the City of Sacramento 2035 General Plan and though not necessarily directly connected to Population and Housing it was included in the DEIR. As such it will be commented on here as all findings in this section, **Impacts POP-1** to **POP-3** were found as "No Impact".

The City of Sacramento 2035 General Plan states:

Goal ED 1.1 Maintain a supportive business climate that increases the City's ability to retain and expand existing businesses and attract businesses

Policy ED 1.1.2 City Image. The City shall continue to promote Sacramento among its citizens and the wider business community as a livable community and an excellent place to do business.

These aspects of the General Plan were not studied and potential impacts not assessed. Thus, the entire analysis of Population and Housing is inadequate and incomplete.

City Image is important and Policy ED 1.1.2 indicates the City will promote Sacramento as a livable community. The Project did not include as an alternative the "Rails with Trails" option. This alternative would appeal to a segment of the citizens of Sacramento. It would also indicate to the business community of how Sacramento supports the preservation of the full history of major Sacramento businesses. A livable community is a community that supports all interests, abilities, desires and needs. A livable community wants and needs parks, recreation, volunteer outlets and educational support venues. A Rails with Trails alternative would show that Sacramento wants a livable community that supports and meets the needs of its citizens which in turn, shows current and future business that Sacramento is THE place to remain or locate to.

The findings of Population and Housing is inadequate and incomplete without a study of how the Project effects City Image.

Recreation

The "Level of Significance" ascribed to Impact REC-4 is understated and inadequately compares the effects of the proposed Project to the environmental setting. Impact REC-4 is defined as the potential to result in permanent displacement of existing recreational facilities or substantial permanent decrease in access to existing recreational facilities or opportunities.

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This impact was found to be "No Impact".

This finding is inadequate since the effects of this project on current recreational activities conducted by a unit of the Old Sacramento State Historic Park were not studied. Significant potential interference at the Northern end of the Project with existing recreational operations that depend on existing facilities could have a negative impact and must be mitigated.

Further study of Impact REC-4 could result in a finding of Less than Significant with Mitigation Incorporated.

Impact REC-4 is incomplete and inadequate.

Sincerely,

Paul A. Helman Sacramento, CA

Response 41A:

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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 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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.

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.

Response 41B:

The EIR evaluated potential impacts to aesthetics and visual quality. The discussion focused on removal of trees and other large vegetation as those changes would have the greatest potential to be observed by viewer groups. Changes to the abandoned railroad facility were considered to not be a significant change to the overall aesthetics of the corridor when comparing the existing condition with the proposed future condition. This included the minor segments of tracks which would be removed for safety reasons, as well as the visual changes that would occur by putting the decomposed granite walking path between the rails in certain parts of the project.

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.

Response 41C:

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.

Response 41D:

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. Rubber is not a material that would be used to fill gaps/cracks because rubber breaks down at an accelerated pace due to the wide range of climatic conditions experienced in the Sacramento Area.

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.

The existing tracks cross an existing drainage channel south of Charlie Jensen Park via a wooden bridge structure. The bridge in its current condition is a safety concern because its south abutment has been burned, there are large gaps between the ties, and there are no railings on the bridge. The

project proposes to remove this unsafe structure and utilize the same crossing location for the trail because it provides the shortest crossing distance of the channel and the smallest construction footprint.

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

Response 41E:

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 41F:

Traffic control would be implemented at all crossings, including Del Rio Road, for cyclist and pedestrian safety. A Technical Memorandum was prepared by Y & C Transportation to summarize the analysis and recommendation for appropriate crossing treatments at each intersection within the project area. This study has been included in Appendix J and is available on the City website for review at <u>http://www.cityofsacramento.org/delriotrail</u>.

The project description has been updated in Section 1.0 to reflect implementation of all traffic control components of the project.

Response 41G:

See Section 2.4 of the EIR, Analysis of Adverse Effect, Standard 1. 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. Two sections of track that require removal for safety or ADA requirements are proposed to be salvaged and reused in adjacent areas where track is already missing, in order to reduce net loss of track resulting from the Project. Other sections of track at certain major intersections will be encased in concrete-leaving the steel rails visible-to increase safety. Use or historical purpose are not protected by the Standards. The majority of the property's features that convey its significance will remain. The ability of a historic property to convey its historic significance is not inextricably tied to its use. The property will retain sufficient physical integrity to convey its original use as railroad line, even if it is no longer used as a railroad line. Similarly, think of a former office building that has been rehabilitated to a hotel use, a very common project type in urban areas. The historic building is no longer used as an office building, but one can still tell it was an office building originally. This type of project is routinely approved by the State Office of Historic Preservation and National Park Service as part of the Federal Rehabilitation Tax Credit which sets a high bar for retaining integrity in rehabilitation projects. The same is true for the proposed project: the historic property may no longer function as a railroad line, but its original use will certainly remain evident and it will retain sufficient integrity to remain eligible for designation. This approach complies with the Standards.

Response 41H:

The CSO consultation summary in Section 2.4 of the EIR has been revised to state:

CSO Consultation

Caltrans applied the Criteria of Adverse Effect to the historic property within the PAL and considered any views concerning such effects which have been provided by consulting parties and the public, as per CFR 800.5(a). The proposed undertaking complies with the Secretary of the Interior's Standards for Rehabilitation. Therefore, Caltrans proposed that a Finding of No Adverse Effect with Standard Conditions through the use of the Secretary of the Interior's Standards for the Treatment of Historic Properties would be appropriate. Consultation with the CSO was initiated on October 12, 2018 pursuant to 36 CFR 800.5(c) and Section 106 PA Stipulation X.B(1). On October 23, 2018, the CSO did not object to Caltrans' Finding of No Adverse Effect with Standard Conditions through the use of the Interior's Standards for the Treatment of Historic Properties. See Appendix G for the CSO letter.

Response 41I:

See Response 40D.

Response 41J:

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.

Response 41K:

The majority of new construction proposed as part of the undertaking will take place adjacent to the historic structure. The new construction is linear and will be located along the historic alignment of the Walnut Grove Branch Line. It will be constructed at or below the same height as the historic structure, using asphalt and concrete. These materials already exist in the vicinity of the resource.

Certain areas of the Project require encasing track in concrete or the full removal of track in order to address safety hazards or ADA requirements. However, this work is generally limited to roadway intersections where the resource has typically already been altered and will not further diminish the existing level of integrity.

In certain areas of the Project alignment, park-like features such as drought-tolerant native landscaping and benches will be introduced among the existing tracks and rails in a manner that does not disturb the historic fabric. Lighting will be added at roadway crossings only. If a material, such as ballast, must be removed in order to install a new element, such as irrigation or plantings, the material will be replaced in kind after the work is completed.

Overall, the undertaking is compatible with the historic resource in its size, scale, and new use. The majority of the work is additive rather than subtractive, and new features of the Project will be differentiated from the historic resource through the use of distinguishable materials that already exist in the immediate surroundings, including concrete and asphalt. The conversion of portions of track into a walking path using DG, or a similar material, is a reversible, non-permanent change that will not damage the integrity of the existing historic fabric. Therefore, the undertaking complies with Standard 9.

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. The current design would require pedestrian and bicycle users to share the Class 1 multi use trail.

Response 41L:

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 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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 41M:

The reported arsenic concentrations are within the range of naturally occurring concentrations with the exception of arsenic in the soil sample from location B2 which was slightly elevated at a concentration of 21 mg/kg. Outlier concentrations are not uncommon and do not necessarily suggest a contaminant impact. If stained soil or other evidence of contamination are encountered during construction of the trail, a qualified environmental consultant should observe and collect samples for analysis to determine if further action is warranted.

Background concentrations of arsenic in California can be variable, and the Limited Soil testing report calculated 95% upper confidence limit for the ten soils samples collected from the site is 12.5 mg/kg; however, further samples will be collected for arsenic analysis on each side of boring B2 prior to construction. Measure HAZ-2 has been included within the EIR:

HAZ-2: Additional testing for arsenic on each side of boring B2 shall occur prior to construction. Should arsenic concentrations exceed the range of naturally occurring concentrations, the City and Contractor shall follow the appropriate protocol for soil disposal and handling. If stained soil or other evidence of contamination are encountered during construction of the trail, a qualified environmental consultant should observe and collect samples for analysis to determine if further action is warranted.

Response 41N:

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.

Response 410:

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 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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.

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.

Response 41P:

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); therefore, the abandoned rail is not considered an existing recreational facility 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.

Sent Via Email: tbuford@cityofsacramento.org

Tom Buford, Principal Planner

January 3, 2019

City of Sacramento Community Development Department

300 Richards Boulevard, Third Floor, Sacramento, California 95811

Re: Comments on Del Rio Trail Project Draft EIR

Dear Mr. Buford:

I am submitting these comments on the Draft Environmental Impact Report (DEIR) for the proposed Del Rio Trail. I wholeheartedly support the creation of a pedestrian and bicycle trail that shares the existing Walnut Grove Branch Line Railroad rail right-of-way.

As currently proposed, the Del Rio Trail Project would permanently remove several segments of the historic Walnut Grove Branch Line railroad tracks, rather than accommodating a shared use right of way. This action would permanently sever the ability to eventually connect and potentially extend the active excursion line starting in Old Sacramento to southern portions of the Walnut Grove Branch line. The DEIR fails to adequately analyze and mitigate the serious impacts of such an action.

My initial comments on the DEIR follow:

less than significant level.



 The DEIR fails to consider the effect of the project on the previously planned expansion of the current excursion train service contemplated in the DPR Old Sacramento EIR between Old Sacramento and Miller Park to the Sacramento Zoo area, as well as the potential addition of a second train line to Hood.



The DEIR fails to include adequate information regarding the cultural and historic setting for the project including the California State Railroad Museum's excursion train on part of the Southern Pacific Walnut Grove Branch Line. Also, many planning and review documents regarding the Sacramento region's rich rail history and resources are improperly ignored.

The DEIR fails to recognize other associated impacts that would result from severance of the

- C D
 - Walnut Grove Branch line, such as impacts of visual, agricultural and recreational resources.
 The DEIR improperly concludes that the project's impacts on historical resources are less than significant after mitigation, and fails to include adequate mitigation to lessen the impact to a



Due to the DEIR's erroneous conclusion that the project would not have significant impact on historical resources, the DEIR fails to adequately examine alternatives that would lessen the significance of this impact.



The DEIR's statements that destruction of the historic tracks is necessary in several locations for safety reasons is not adequately supported.

These and other defects make the DEIR inadequate. I am requesting that the City take another, more objective, look at the project in light of the increased respect for and accommodation of our region's high quality railroad history and future, embodied in the Walnut Grove Branch Line. Obviously, this revisit needs to be done in conjunction with a complete analysis of the environmental effects of the project required by CEQA. This new effort will lead to a multi-use trail worthy of adoption.

Many knee-jerk actions and reactions, in response to a misinformed but vocal few, have been made in the past. These actions cannot now be corrected. Do not made a similar blunder on the Del Rio Trail.

Thank you for considering these response comments and please feel free to contact me with questions, comments and suggestions.

Sincerely,

Steven C. Szalay



Response 41A:

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 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.

Response 42B:

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 with supporting material, such as maps from the Sacramento State Historic Park General Plan and WGBL, are not included within the EIR. 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.

Response 42C:

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); therefore, the abandoned rail is not considered an existing recreational facility 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.

Transportation Company provided written communication that the abandonment of the line as authorized by the Commission was completed. The currently segmented, abandoned rail within the proposed project area is not an active running agricultural freight train and has not provided freight services for growers since 1979. Additionally, there are no parcels within the project area zoned for agricultural use. Parcels directly south of the project site are zoned "A" for Agricultural; however, the current land use for those parcels is for operation of the Freeport Water Tower (see Figures 4 and 5). There are no other parcels zoned for agricultural use located within or directly adjacent to the project area; therefore, no impacts to agricultural resources would occur.

The EIR evaluated potential impacts to aesthetics and visual quality. The discussion focused on removal of trees and other large vegetation as those changes would have the greatest potential to be observed by viewer groups. Changes to the abandoned railroad facility were considered to not be a significant change to the overall aesthetics of the corridor when comparing the existing condition with the proposed future condition. This included the minor segments of tracks which would be removed for safety reasons, as well as the visual changes that would occur by putting the decomposed granite walking path between the rails in certain parts of the project.

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.

Response 42D:

Built environment historic resources (such as a railroad) are typically evaluated by determining if a proposed project would reduce the physical integrity of the historical resource to the degree that it could no longer convey its historic significance. Under NEPA the threshold of significance is: Would the resource continue to be eligible for inclusion on the National Register of Historic Places, and likewise for CEQA, would the resource continue to be eligible for inclusion on the California Register of Historic Places. A Finding of No Adverse Effect Report was prepared for the project that includes an evaluation of the proposed project's potential to impact the historic railroad and, under CEQA, concluded that there would be no significant impact with mitigation incorporated. The property would retain sufficient integrity to remain eligible for listing on the California Register of Historic Places after the project is complete. The appropriate mitigation in this case is compliance with the Secretary of Interior's Standards which allows the City of Sacramento to make this CEQA determination.

Response 42E:

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. 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.

Response 42F:

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. Rubber is not a material that would be used to fill gaps/cracks because rubber breaks down at an accelerated pace due to the wide range of climatic conditions experienced in the Sacramento Area.

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.

The existing tracks cross an existing drainage channel south of Charlie Jensen Park via a wooden bridge structure. The bridge in its current condition is a safety concern because its south abutment has been burned, there are large gaps between the ties, and there are no railings on the bridge. The project proposes to remove this unsafe structure and utilize the same crossing location for the trail because it provides the shortest crossing distance of the channel and the smallest construction footprint.

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

Comment 43: Jenchi lim (January 7, 2019)

Tom Buford

From:	jenchi lim
Sent:	Monday, January 7, 2019 12:55 PM
To:	Tom Buford; slpna@slpna.org
Subject:	Del Rio Trail

I Support the Del Rio Trail and NO train tourist attraction. The railroad runs along residential area, very close to many homes. The noise and pollution will be a great concern for any possible operation of a train. Thank you Jennie L

Response 43:

Thank you for your comment and support of the project.

Comment 44: Jim Appleton (December 6, 2018)

578 W R 1 66 51 DRAFT ENVIRONMENTAL THE IMPAC T REPORT SACRAMENTO COMMENT CARD PROJECT Department of Public Works Public Information Meeting The period for public review and comment is Thursday, December 6, 2018 November 5, 2018 through January 3, 2019. Name: SIM Address (Option Telephone (Op ENTENDS TO SUP DENE @ ganization (Optional): Comment: X-ING GA C

Response 44:

Thank you for your comment. Traffic control would be implemented at all crossings for cyclist and pedestrian safety. A Technical Memorandum was prepared by Y & C Transportation to summarize the analysis and recommendation for appropriate crossing treatments at each intersection within the project area. This study has been included in Appendix J and is available on the City website for review at <u>http://www.cityofsacramento.org/delriotrail</u>.

The project description has been updated in Section 1.0 to reflect implementation of all traffic control components of the project.

Elimination of parking along South Land Park Drive approaching the crossing is not a component of the project at this time.

Comment 45: Julie Avery (January 7, 2019)

Tom Buford

From:	Avery, Julie
Sent:	Monday, January 7, 2019 5:27 PM
To:	Tom Buford
Cc:	SacRailActionGroup@Gmail.com
Subject:	Support Statement re. Sacramento Southerr

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:

First - I am a retired curator of rural life and culture from Michigan State University who has worked utilizing arts and culture — museums as a tool for region and community building, economic development and tourism. As a visitor to the Sacramento area I am interested and impressed with the work and engagement that the Sacramento Southern is accomplishing in their community and surrounding area. I totally support this issue:

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:

Α

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.



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.

С

D

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. 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

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

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.



Ε

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,

Julie A. Avery, Ph.D. Curator Emeriti - Rural Life and Culture

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

Response 45A:

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 45B:

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 45C:

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 45D:

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 45E:

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 46: Kim Harrington (January 9, 2019)

Tom Buford

From:	Kim Harrington •
Sent:	Wednesday, January 9, 2019 12:17 PM
To:	Tom Buford
Cc:	Sacramento Rail Preservation Action Group - SPRAG
Subject:	Del Rio Trail (DRT)



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.

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.



Α

В

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.

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.

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, [Kim Harrington]

cc: SacRailActionGroup@Gmail.com

Kim Harrington Kim Harrington Photography khphoto@sbcglobal.net 510.653.6554 Office

Response 46A:

Thank you for your comment. 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 46B:

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 46C:

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 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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.

Comment 47: Lynne Sawyer (January 7, 2019)

Tom Buford

From:	Mom
Sent:	Monday, January 7, 2019 5:08 PM
To:	Tom Buford
Cc:	SacRailActionGroup@Gmail.com
Subject:	Please protect the SSRR/WGBL

Hello,

My name is Lynne Sawyer and I am a public school teacher. I am writing to you to encourage you to do whatever it takes to protect the Sacramento Southern Railroad/Walnut Grove Branch Line, part of the National Register of Historic Places.

I am sure you know as well as I do, that many many students from all over the State of California have enjoyed taking a historic ride on the Sacramento Southern Railroad, and that doing is the best part of learning. It is far more helpful to experience something than to read or talk about it. Our local history is extremely important to the rest of the State, and this is a way that you can help thousands of students learn and appreciate the history of the area in which we live, including from Old Sacramento to the Sacramento Delta.

Please don't allow a small number of people to keep the rest of thousands of Californians from enjoying this treasure.

There are so many parts of history that we have lost and many people have taken the time to preserve the area of Old Sacramento and I am so grateful for that. Please join them in protecting this historical rail line.

Thank you, Lynne Sawyer

Response 47:

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.

Comment 48: Mario D. Allen (January 8, 2019)

Tom Buford

From:	Mario Allen - Tuesday, January 8, 2019 6:37 PM
Sent:	
To:	Tom Buford
Subject:	Del Rio Trail Draft EIR (DEIR) (K15165100)

1/8/2019



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

В

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.

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.



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. 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.

Ε

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,

Mario Allen

Response 48A:

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 47B:

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 48C:

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 48D:

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 48E:

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 49: Paul Murray (January 8, 2019)

Tom Buford

From:	Paul Murray -
Sent:	Tuesday, January 8, 2019 8:10 PM
To:	Tom Buford
Subject:	Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

Via Email To:

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 a resident of the city of Sacramento writing in opposition to the Del Rio Trail Draft EIR (DEIR) (K15165100) and offer the following for your consideration:

The DEIR damages a nationally-recognized historical artifact and totally misses internationally used rail/trail solutions. The DEIR also does not document the potential Sacramento economic development which result with the operation of a longer world-class heritage excursion railroad.

The DEIR is defective due to the following issues:

Α

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.



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



The DEIR clearly has an anti-rail bias in that a known solution of rails-with-trails is available, safe and has been 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.



The DEIR does a significant economic disservice to the people of Sacramento and to the citizens of California. None of this economic analysis appears in the DEIR. By severing the north and south portion of the Sacramento Southern's rails, the DEIR destroys the tourism potential of expanded heritage rail excursions. Already, the California State Railroad Museum brings in over 300,000 annual visitors, the Sacramento Southern 20,000 summer riders and another 25,000 riders between Thanksgiving and Christmas holidays.. An expanded and longer excursion service would increase income for local tourism-related business, primarily hotel and restaurant spending. 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.

Ε

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 to the existing Sacramento Southern rail line such as currently exists between Old Sacramento State Historic Park and Sacramento's Miller Park would meet all needs. This approach would also speed construction of the trail portion. Economically, the rail-with-trail would be cheaper, while servicing the needs of rail, pedestrian and bicycle traffic.

The Del Rio Trail DEIR must be rewritten as it is, in my view and that of others who wish to see Sacramento grow and prosper as a world-class travel destination, wrong and incomplete in its present form.

Sincerely,

Paul Murray

Sent from Mail for Windows 10

Response 49A:

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 49B:

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: <u>http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf</u>

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 49C:

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 49D:

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 49E:

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 50: Ralph Orlandella (January 7, 2019):

Tom Buford

From:
Sent:
To:
Subject:

Ralph Orlandella Monday, January 7, 2019 5:21 PM Tom Buford Del Rio Trail Anti Rail Bias

Ralph Orlandella

Via Email To: TBufore@CityOfSacramento.Org

Mr. Tom Buford Manager, Environmental Planning Services City of Sacramento Community Development Department <u>300 Richards Blvd., 3rd Floor</u> 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:

Α

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.



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.

С

D

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.

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.

Ε

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, Ralph Orlandella

Sent from my iPad

Response 50A:

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 50B:

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 50C:

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 50D:

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 50E:

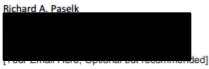
To further minimize impacts to environmental resources, the proposed project has been revised to remove the separate walking trail. Additionally, a No-Build Alternative is also now considered in the EIR. The EIR has been revised to include analysis of the No-Build Alternative within each section of the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

Comment 51: Richard Paselk (January 9, 2018)

Tom Buford

From:	Richard A Paselk <
Sent:	Wednesday, January 9, 2019 11:24 AM
To:	Tom Buford
Subject:	Re: Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)

From;



Via Email To: TBufore@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 new Docent ant the California State Railroad Museum I have become concerned about the irreversible damage that will be done to future excursion railroad possibilities in the current Del Rio Trail Draft EIR. As I have become aware the Museum is an internationally renowned attraction for Sacramento. Each week I talk to visitors from around the state, the nation and around the World.

In the past few weeks alone I have met visitors from China, Japan, Korea, Australia, New Zealand, a variety of European countries and from around the USA and California. I am convinced that enhanced excursion rides would only enhance our attractiveness and value to Sacramento and the surrounding areas.

As noted below there are significant issues with the current Draft EIR. Please consider carefully their current and future impacts on both Sacramento and its surroundings. In this year of the 150th anniversary of the completion of the Transcontinental Railroad, one of the World's great technological accomplishments, to which Sacramento was a key player, it would be particularly sad to lose this historic link.

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:



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.



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.

1

С

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.

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.



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,

Rich Paselk



Richard A. Paselk, Ph.D.



Curator and Webmaster Robert A. Paselk Scientific Instrument Museum Humboldt State University Library http://humboldt.edu/scimus/

Curator Emeritus and Exhibits Webmaster HSU Natural History Museum http://www.humboldt.edu/natmus/

Mail:

Response 51A:

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 51B:

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 51C:

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 51D:

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 51E:

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 52: Ron Butts (January 8, 2019)

Tom Buford

From:	Ron Butts
Sent:	Tuesday, January 8, 2019 10:36 AM
To:	Tom Buford
Cc:	SacRailActionGroup@Gmail.com
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:

Α

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.



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/).

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.

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

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Response 52A:

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 52B:

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 52C:

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 52D:

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 52E:

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 53: Ryan Adam (January 8, 2019)

Tom Buford

From: Sent:	turbohydramatic - Tuesday, January 8, 2019 7:03 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: TBufore@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:



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.

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.



В

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.



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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.

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.

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Sincerely,

Ryan Adam Folsom, CA

Response 53A:

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 53B:

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 53C:

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 53D:

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 53E:

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 54: Stephen E. Drew (January 7, 2019)

From: Stephen & Beverly Drew Sent: Tom Buford To: Subject:

Monday, January 7, 2019 6:04 PM Fw: Del Rio Trail Draft EIR

--- Forwarded Message -From: Stephen & Beverly Drew To: tbufore@cityofsacramento.org <tbufore@cityofsacramento.org> Cc: sacrailactiongroup@gmail.com <sacrailactiongroup@gmail.com> Sent: Monday, January 7, 2019 06:00:52 PM PST Subject: Del Rio Trail Draft EIR

Mr. Tom Buford:

The purpose of this e-mail is to object strongly to the Del Rio Trail Draft EIR.

The document overlooks obvious rail-trail solutions. It negates the significant impact of the California State Railroad Museum and its excursion railroad program. It ignores the value of the Sacramento Southern-Walnut Grove Branch Line corridor and the importance of maintaining this more than century-old rail transportation line.

The Sacramento Southern Railroad brings the California State Railroad Museum to life. After looking at static restored locomotives and cars, Museum visitors have the unique opportunity in Old Sacramento to step aboard a live steam train for a ride along the Sacramento River. The late 1970s vision first articulated by William Penn Mott, Jr. was to go one way by steam train and the other by paddle-wheeler along the river with the two meeting at Hood. The Museum has worked tirelessly to maintain this corridor with the vision of one-day making this plan a reality. Taking the heart out of the branch line will destroy this opportunity forever.

The Museum has a significant visitor and financial impact on Sacramento and the local area which needs to be recognized. The California State Railroad Museum is a worldclass museum which attracts more than 300,000 visitors plus 45,000 who ride the trains on an annual basis. The Museum needs the trackage so that the equipment "can stretch its legs" and so that visitors will have a full experience during their visit.

I encourage you to re-visit this issue and to give the California State Railroad Museum and its vital rail passenger program every consideration. To do any less would significantly undermine the future of this very significant Sacramento resource.

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Sincerely,

Stephen E. Drew

Response 54:

Thank you for your comment. 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 is not included within the DEIR 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 DEIR 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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.

Comment 55: William Nyden (January 8, 2019)

Tom Buford

From:	William Nyden			
Sent:	Tuesday, January 8, 2019 12:00 AM			
To:	Tom Buford			
Cc:	SacRailActionGroup@Gmail.com			
Subject:	Defects and Anti-Rail Bias in the Del Rio Trail Draft EIR (DEIR) (K15165100)			

William Nyden



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 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:



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.



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.





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.

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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,

William Nyden

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

Response 55A:

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 55B:

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 55C:

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 55D:

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 55E:

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 56: Gregg Lukenbill (January 14, 2019)

GREGG LUKENBILL

January 14, 2019

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

Re: Del Rio Trail Draft EIR: 1) Truncated EIR Scope; 2) Erroneous Project Descriptions 3) City failure to proceed in the manner prescribed by law

This Draft Sacramento City environmental impact report ("DEIR") as proposed, has been developed by the City to forcibly eliminate public participation, having decided many matters before those affected (Sacramento citizens) have even heard about sinister City actions leaving the public no option, as a 'fait accompli', but to accept City staffs wholly fabricated, unsupported covert staff decisions without public scrutiny. Donald Trump and Vladimir Putin would both be proud to own this DEIR by Sacramento City staff, a product wholly made and executed with a base line document structure of alternative unsupported facts. The Swamp moves west!

This DEIR bisects and destroys a National Historical Resource, severs and destroys the Sacramento Southern Railroad, Polar Express, School Children Educational Trains, and tramples the Old Sacramento State Historical Park from the Railroad Museum to the Stone Lake National Wildlife Refuge and Nationally Historic Locke, all in Sacramento County. How does City staff accomplish this? It simply omits these resources altogether from the historic or current environment, and the public record required of a DEIR. The 39 years of Sacramento Southern Railroad operations, which moved 82,000 passengers in 2018, and California State Parks published Railroad Museum operational plans of the Sacramento Southern Railroad are never mentioned in the DEIR. The Old Sacramento State Historic Park (OSSHP) approved General Plan, six blocks from City Hall, is omitted from the report. The thrice recognized National Historic Resource Walnut Grove Branch Line, our Farm to Fork Cultural Historic relationship that reclaimed 1,200 square miles (12 times the size of the City) of the Sacramento County Delta from salt water to lush farm land, creating tens of thousands of cannery jobs for generations of Sacramento families, is not only omitted, it is obliterated. But it only gets better.

City staff proudly includes a last second August, 2018 City submittal, and October 22nd, 2018 EIR surprise from Cal Trans wherein, without a single public hearing, environmental staff decisions have been made on a City and Cal Trans federal submittal, without public scrutiny or input, titled:

"FINDING OF NO ADVERSE EFFECT WITH STANDARD CONDITIONS - SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES"

<u>40CFR §1500.1(b)</u> "NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.

The NEPA related CSO document conclusions are in direct violation of 40 CFR §1500.1(b) & 1500.2. On page 1 Section 1.2 of the DEIR, the City of Sacramento announces that the City itself is serving as the environmental experts and scientists for the DEIR, literally moving the fox into the hen house. Then they announce that they covertly filed documents with Cal Trans in August, 3 months in advance of publishing the DEIR (in which the

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application is not included) to achieve a 291 page NEPA determination by the CSO without public scrutiny, or even access to the application. And the Finding of No Adverse Effect with Standard Conditions (DEIR, App. J.2) by GPA of Los Angeles is riddled with omissions, errors, and truncated and false statements that are just now seeing public scrutiny. Made as instructed by the City.

The DEIR and Appendix J.2 does not even accurately quote 36 CFR 60.4 omitting the entire preamble, <u>"The</u> <u>quality of significance in American history, architecture, archaeology and culture is present in districts, sites,</u> <u>buildings, structures, and objects of state and local importance that possess integrity of location, design,</u> <u>setting, materials, workmanship, feeling, and association,"</u> and truncates <u>(a) "That are associated with</u> <u>events that have made a significant contribution to the broad pattern of our history"</u>. The City hires a Los Angeles consultant to trash our globally unique Farm to Fork wholly Sacramento City and County Delta history, proudly proclaiming it a victory in the DEIR.

This is but the tip of the City misrepresentations to the State, and Federal government, in what might be construed as the continuation of a City effort in cooperation with SACOG and RT to get federal money with a scheme and a filing that misrepresents the facts, solicits funding with false filings, and which if done intentionally actually crosses over to criminal, rather than civil law. One wonders what Donald Trump would think about this administrative management by the City.

There is another minor problem; NEPA 1500.1(b) requires <u>"public scrutiny essential to implementing NEPA"</u>, in defining the "Purpose. The City application prepared for Cal Trans and granted by the CSO did not adequately engage the public. The City cannot make its own rules.

And of course, see other omitted EIR facts and documents in the City's alternate universe. The "nugget" taken away from this interesting City attempt to defraud the citizens of Sacramento of transparent information, is the clever use of the LA consultant GPA invented word "segment" for the National Historical Resource, a filing which does not meet the most basis standards of CEQA or NEPA. The GPA defined only the Del Rio Trail parcel in the filing, the use of which does not comply with the basis CEQA definition of environment

§ 21060.5 Environment

CA PUBLIC RESOURCES CODES -

"Environment" means the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance.

§ 15125. Environmental Setting.

(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally <u>constitute the baseline physical conditions by which a lead agency</u> determines whether an impact is significant

On the next two pages are two maps omitted by the City in the DEIR.

The first is from the Old Sacramento State Historic Park ("OSSHP") Planning Area General Plan, contained in the Final OSSHP EIR and General Plan, which is an egregious intentional omission.

The second is the Walnut Grove Branch Line map included or referenced in all 3 federal Army Corps of Engineers studies provided digitally to the city, none of which were included in the DEIR.

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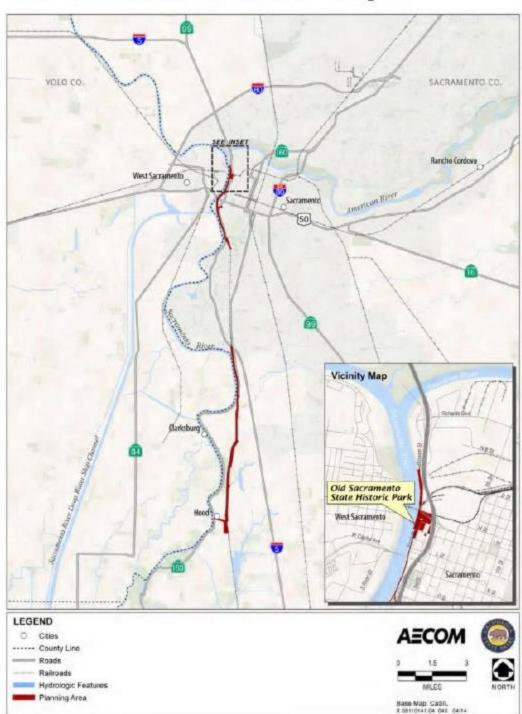


Exhibit 1-1: Old Sacramento State Historic Park Planning Area

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THIS CITY AND STATE PUBLISHED DOCUMENT WAS INTENTIONALLY OMITTED FROM THE PLAN

Walnut Grove Branch Line Railroad HAER No. CA-357 (page 10)

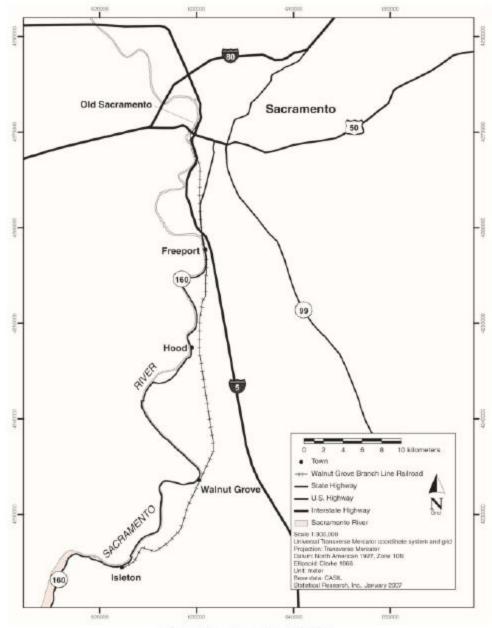


Figure 1. Location of the WGBLRR.

This map is used as the base line in three Army Corps of Engineers published documents in 1991, 1992 and 2007, all studies provided digitally to the city on July 9, 2018 in association with the NOP, and requested that the city publish them along with the EIR. They did not do so, which in my opinion diminishes public accessibility to historical information concerning the destruction of a Sacramento recognized National Historical Resource.

The Caltrans Section 106PA filed in theoretical compliance with Section 106 of the National Preservation Act is based on information that is not in compliance with either federal or state environmental laws in terms of the proposed project, and a myriad of historical documents that continue to be withheld from the this public NEPA and CEQA EIR process.

The alternative facts presented by City planning staff to the public in the Del Rio Trail Draft Environmental Impact Report (EIR) are a MAI ("made as instructed") city work product devoid of factual environmental information with a clearly malicious purpose.

This intensely focused city effort would be comical, were the intended results not so tragic and permanent for all Sacramento city, county and regional residents, as well as future generations.

The clear and obvious primary purpose of this carefully designed, fraudulently constructed environmental document, prepared under the direct supervision of city planning staff, is to circumvent and elude federal, state, county and city environmental law while permanently severing a nationally recognized state and federal historical Sacramento artery; the Sacramento Southern Railroad Walnut Grove Branch Line.

As the City administration truncates and falsifies the Del Rio Trail public record with millions of dollars of local, state and federal funds, in support of their political agenda, the victims of this directed City administrative malfeasance are the citizens of the City and County of Sacramento, and the surrounding region.

The base line environmental conditions of the entire report are obviously misrepresented by the City omitting legally required reference documents and manipulating what is presented so as to destroy a treasured nationally recognized historical resource, in a manner that it tantamount to fraud.

The mismanagement and blatant disregard of the published historical record within this Del Rio Trail EIR already makes it clear that the primary purpose of this draft EIR document is to sever, and forever destroy, a unique, nationally recognized California State Parks, County and City of Sacramento historical resource, by recklessly failing to proceed in the CEQA and NEPA manner prescribed by law through a distorted public record and countless misrepresentations of the facts.

On page XXV under Anticipated Construction Equipment, the DEIR leaves out the 8' wide vibrating roller compactor necessary for earth fill levee expansion west of Parcel 49 from the I-5 bridge to Sutterville Road. The ground vibrations will impact the homes along Darnell Way. I am speaking from the experience of 4 million square feet of commercial constructed buildings, and thousands of acres of road and parking lot construction including all the major streets of North Natomas which were built privately and sold to the city through an Acquisition Assessment District. The City is seriously understating the impacts and the costs associated with the I-% bicycle bridge, and the wholly destructive berm concept behind the homes along Darnell Way. Here again, the City is misrepresenting the environmental impact facts and doing a serious and irresponsible disservice to the public, particularly to the homeowners along Darnell Way.

The Introduction 1.1 on page1 is False. The DEIR is clearly not in compliance with either CEQA or NEPA. The statement "complete description" is also false with massive omissions.

On page 2 section 1.3 the DEIR's manipulative administrative omissions of this document creates more impacts than it avoids and does not attempt to avoid or mitigate its destructive intentions clearly evidencing the City failure to proceed in the manner prescribed by law. It is false to say that the City prepared this EIR in accordance with CEQA Guidelines section 15000 et seq.

The entire 1.7 Scope discussed on page 7 of the DEIR results in false findings, conclusions and impact determinations that effectively defrauds the public from a legitimate objective legally compliant effort on the part of the City of Sacramento. This effort is a waste of taxpayers' money and will not stand any test of reasonableness.

On page xxvi the City has not stated all of the Areas of Controversy. The following are also Areas of Controversy:

 I have provided digital support documentation which the city has intentionally withheld from the public. Due to the fact that the City is improperly representing and analyzing the Del Rio Trail as a "segment", both at the CSO, as well as under NEPA and CEQA § 21060.5 Environment and § 15125. Environmental Setting as previously stated, I am again requesting the digital historical record be completed and made available to the public in the final EIR submitted on July 9th.

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2) Another obvious area of controversy is the City's ethical track record to serve as the lead responsible Environmental Consultant. The City does not have the scientific capacity or environmental expertise required by <u>40 CFR §1500.1(b)</u> to make scientific and environmental decisions. GPA states they work for Dokken, Dokken states they are the City's scribe. The City has clearly failed up to proceed in the manner prescribed by law by the preparation of this document. **40 CFR §1500.1 Purpose.**

(a) The National Environmental Policy Act (NEPA) is our basic national charter for protection of the environment. It establishes policy, sets goals (section 101), and provides means (section 102) for carrying out the policy. Section 102(2) contains "action-forcing" provisions to make sure that federal agencies act according to the letter and spirit of the Act. The regulations that follow implement section 102(2). Their purpose is to tell federal agencies what they must do to comply with the procedures and achieve the goals of the Act. The President, the federal agencies, and the courts share responsibility for enforcing the Act so as to achieve the substantive requirements of section 101.

(b) NEPA procedures must insure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA. Most important, NEPA documents must concentrate on the issues that are truly significant to the action in question, rather than amassing needless detail.

- 3) The factual record of omissions to this DEIR are legally inexcusable starting with State Parks Sacramento Southern Railroad, and the OSSHP plan on both ends of the GPA "segmented" National Historical Resource route which would become 3 discontinuous arteries under the project.
- 4) The correct application of § 21060.5 Environment and § 15125. Environmental Setting to the thrice recognized totality of the thrice recognized National Historical Resource Walnut Grove Brach Line as the Cultural Historical Agriculture Farm to Fork Artery of Sacramento History that it actually is that had and still has a massive historical impact on Sacramento.
- 5) The Public Outreach throughout this project and for the Finding of No Adverse Effect with Standard Conditions DEIR Finding Determination attachment (DEIR, App. J.2) has been intentionally fraudulently managed by the City. The City does not state that it is severing the contiguous rails at Sutterville Road, and attempts to deceive the CSRM, State Parks, and the public of which this DEIR is the primary evidentiary document of this City's fraudulent behavior,
- 6) At no point does the city honestly state that its primary objective is to sever the rails at Sutterville Road, terminating State Parks rail access to the southern 21 miles of California State Parks 39 year old plan, and to own up to the honest and transparent economic and cultural impact financial responsibility for doing so, instead of whatever brand of Trump or Putin administration this dishonest use of CEQA and NEPA in the DEIR actually is.
- 7) The Land Use application and handling of this DEIR is false and skews the public, political, technical and legal analysis
- 8) The treatment of the Cultural Historical Record is a repudiation of our historical identity that needs to be amended

Similarly, on the same page xxv1, the "ISSUES TO BE RESOLVED" in this DEIR is incomplete, not in legal compliance, and does not circumscribe the identification of issues to be resolved as inferred.

On page xxx regarding the Historical Resources, I believe that the City obtained CSO "FINDING OF NO ADVERSE EFFECT WITH STANDARD CONDITIONS - SECRETARY OF THE INTERIOR'S STANDARDS FOR THE TREATMENT OF HISTORIC PROPERTIES" regarding NEPA was inappropriately obtained with a truncated (36 CFR 60.4) definition, a misrepresented land use, boundaries, area of impact, NEPA and CEQA descriptions and the segmenting of a whole cultural "Line" artery, route,, thoroughfare, national historical resource.

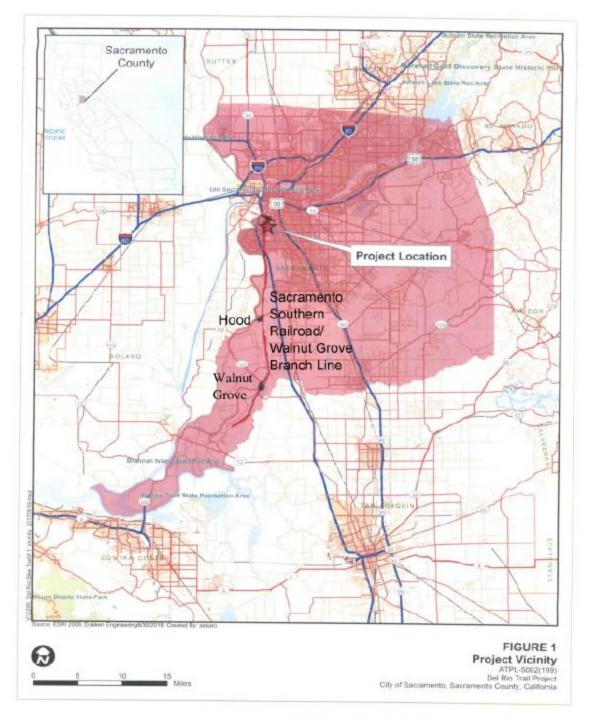
The physical boundaries of the 1991 Significance Determination are contained in the 1992 Army Corps of Engineers National Register Nomination filing as follows:

Verbal Boundary Description:

The Branch Line Railroad begins at the terminus of I Street at Front Street in the City of Sacramento and continues south and west 24.5 miles to the north end of Walnut Grove, California, just south of the Delta Cross Channel. It is contained entirely in Sacramento County and is depicted by the United States Geological Survey on five topographic quadrangles (7.5 minute series, see attached). The route averages 16 feet in width.

The Walnut Grove Branch Line Map depicted on the City DEIR project vicinity map is on the next page.

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Del Rio Trail proposed severing of 21 miles of contiguous impacted Sacramento Southern Railroad Walnut Grove Branch Line depicted on DEIR page ii project Vicinity Map per § 15125 as stated in TOC page xxxii.

Continuing the 1991 Army Corps Significance Finding in the 1992 National Registration Nomination

Boundary Justification:

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The property boundaries are based on land purchases made by the Sacramento Southern Railroad Company in 1905 and historic alignment maps and include the historic location of the main line. The elevated levee is still evident traversing the landscape for the majority of the 24.5-mile corridor. The boundaries include the entire length and width of that portion of the railroad constructed between 1908 and 1912, with the exception of 0.5 miles of route within the town of Walnut Grove. This section of levee, rails, and ties was removed and subdivided around 1988, and therefore is not included in the property boundaries. Given the construction methods and the importance of the line to the economic development of the Delta, the Walnut Grove Branch Line Railroad appears eligible to the National Register of Historic Places

§ 15125. Environmental Setting.

(b) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant

The Summary and Conclusions Page of the 1991 Resource Significance Determination states:

"Given the construction methods and the importance of the line to the economic development of the Delta, the Walnut Grove Branch Line Railroad appears eligible to the National Register of Historic Places

How do you "segment" a National Historical Resource with registered Boundary Descriptions and Boundary Justification contiguously mapped.

The following California State Parks & Railroad Museum Published Mission Statement and strategy must be integrated into the planned and encompassed as impacted by the project as proposed.

The following is the published State Parks Mission Statement

: "The California State Railroad Museum preserves and interprets the artifacts and culture of Western railroads and railroading for present and future generations. We use iconic collections, innovative and immersive exhibits, engaging, interpretation and programs, and memorable event to create enjoyable experiences, empower learning and inspire appreciation for a diverse audience about the role and impact of the railroad and mobility in California, the West, and the Nation.

California State Parks Strategy K – Sacramento Southern Railroad ("SSRR) Value and Integration – Integrating the SSRR and unlocking its value as a key CSRM program

Goal 11.1: As a key CSRM program, SSRR unlocks its potential and is fully integrated with the museum's mission, its
programmatic, interpretive and exhibit needs, and public value delivery.

Goal 11.2: There is organizational clarity about the desirability of the Zoo and Hood extensions, their value to CSRM, business
implications, and how they should be prioritized and addressed

Herewith AGAIN is the attachments list included in my July 9th EIR comment submittal letter to the City.

"The following related documents are hereby enclosed on a flash drive in reference the foregoing, to be included in the public record."

- 1) 1980-Jerry Brown Steam Train To Sacramento (digital and paper)
- Sacramento Southern Aerial Video (flash drive only) (flash drive only)
- 3) Sacramento Southern video of the docent volunteer construction of the route (flash drive only)
- Walnut Grove Branch Line EIR Historic Route (digital and paper)
- 5) 1991 9-26 Final Specific Excursion Train EIR Approval (digital and paper)
- 6) 1989 Draft EIR for Steam Train Extension to Hood Merged & compressed (digital and paper)
- RT-CA Agreement 4-11-88 for ROW Sac Southern

8) 1991-4-30 Army Corps National Historic Resource Determination (digital and paper)

- 9) 1991 4.5 mile 035-0010-053 Regional Transit (RT) Title Report and Recorded Survey Document
- 10) 1992-8-19 Army Corps Walnut Grove Railroad National Register Nomination (digital and paper)
- 11) 1994 Sac RT South Sacramento Corridor Transit Improv EIR (includes excursion train) (flash drive only)
- 12) 1996-2-28 CSRM to Reg Transit Proposed lease of South Sac ROW (digital and paper)
- 13) 2007 National Historic American Engineering Record (HAER) Registration (digital and paper)
- 14) 2014 June Final Old Sacramento State Historic Park EIR and General Plan (flash drive only)
- 15) SACOG 5-28 2015 Original Application Del Rio Trail application (flash drive only)
- 16) CA PARKS-CSRM-FOUNDATION JOINT Strategic MASTER PLAN Document As Approved June 13 2017 (flash drive only)

Finally attached hereto are a Board Resolution and Memorandum regarding the Sacramento Historical Society position regard the Del Rio Trail

SCHS Board Final Minutes March 13, 2018 @ 6:30PM

11) Consider a proposal for the Sacramento County Historical Society to publicly oppose the City of Sacramento's removal of the Sacramento Southern rails south of Sutterville Road to Pocket Rd. The Board unanimously approved the Sac Southern resolution attached hereto as page 3.

SCHS Board Resolution

Resolved: That the Sacramento County Historical Society opposes the City's plan to approve the Del Rio Trail by Mitigated Negative Declaration unless the City retains the historical rails of the Walnut Grove Branch Line; or, if planners intend to remove any rails, the Society demands: (a) that the City solicit and accept adequate public input, including input from all stakeholders; (b) that the City create and circulate a draft Environmental Impact Report under CEQA and a draft Environmental Impact Statement under NEPA; and, (c) that the City proceed with plans for removing any rails only after finalizing an adequate EIR and EIS, incorporating consideration of all public comment and a suitable study of alternatives to removal.

RATIONALE FOR A MOTION OF THE SACRAMENTO COUNTY HISTORICAL SOCIETY BOARD TO OPPOSE THE REMOVAL OF HISTORICAL RAILS FROM THE WALNUT GROVE BRANCH LINE / DEL RIO TRAIL

1. Southern Pacific Railroad constructed the Walnut Grove Branch Line, also known as the Sacramento Southern Railroad, with completion to Freeport in 1906, to Walnut Grove in 1912, and to Isleton in 1929. The line brought agricultural products to Sacramento for distribution throughout the country, serving as Sacramento's first farm-to-fork rail line.

2. The California State Historic Preservation Office determined in 1991 that the Walnut Grove Branch Line is a historical resource under state and federal law, eligible for the National Register of Historic Places;

3. Southern Pacific discontinued service on the Walnut Grove Branch Line in 1978 and thereafter sold off the rightof-way. Sacramento Regional Transit (RT) purchased the right-of-way from Sutterville Road to Pocket Road to for possible development as a light-rail line. The California Department of Parks and Recreation bought the remainder of the right-of-way to Hood for development as an excursion railroad.

4. In 1994, RT decided to forego the use of the corridor as a light-rail line. More recently, RT agreed to transfer RT's right-of-way to the City of Sacramento ("City") for development as a multi-use trail to be known as the Del Rio Trail.

5. Planning for the Del Rio Trail appears to have been done largely during private meetings with a neighborhood association, some of whose members oppose any future use of the rails. The City did not provide notice to or seek input from important stakeholders such as the California State Historic Preservation Office, California Department of Parks and Recreation, the California State Railroad Museum Foundation, or the Sacramento County Historical Society.

6. The City proposes a costly plan to remove the rails, and to develop two separate trails, one for walking (which may not be compliant with Americans With Disabilities Act requirements) and a bicycle trail. However, the bicycle trail will also incorporate decomposed granite shoulders that multi-use trails, including the American River Bike Trail, incorporate to accommodate walkers and runners.

7. The redundant two-trail concept may be a disingenuous justification to remove the historical rails of the Walnut Grove Branch Line along much of the Del Rio Trail by claiming insufficient space to accommodate both the rails and the dual trails. The plan adds to the overall cost and potentially delays completion of the trail.

8. The City has sought both state and federal funding for the development of the Del Rio Trail. The City claims that plans for the Del Rio Trail are exempt from a full environmental review under the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"), despite the apparent requirement for a full environmental review as a condition to removal of historical resources.

9. The City proposes to approve plans for the Del Rio Trail in a Mitigated Negative Declaration, claiming categorical exemptions under CEQA and categorical exclusions under NEPA. The proposal exposes the City to litigation for using abridged procedures that do not seek sufficient public input and do not fully consider alternatives to removal of the historical rails.

Therefore, the Sacramento County Historical Society Board should consider the following motion for a Board resolution for public circulation:

Resolved: That the Sacramento County Historical Society opposes the City's plan to approve the Del Rio Trail by Mitigated Negative Declaration unless the City retains the historical rails of the Walnut Grove Branch Line; or, if planners intend to remove any rails, the Society demands: (a) that the City solicit and accept adequate public input, including input from all stakeholders; (b) that the City create and circulate a draft Environmental Impact Report under CEQA and a draft Environmental Impact Statement under NEPA; and, (c) that the City proceed with plans for removing any rails only after finalizing an adequate EIR and EIS, incorporating consideration of all public comment and a suitable study of alternatives to removal.

Response 56A:

Thank you for your comment. 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 56B:

The proposed project would construct and operate a 4.8-mile Class I multi-use trail. An excursion rail is not a project component; therefore, analysis of current and future 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. 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 trail project would remove approximately 2% of rails along the route. The project has been revised to eliminate the walking trail (areas in which decomposed granite would be deposited between existing rails as a walking surface) which further eliminates obstacles to future rail services that would result from project implementation.

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 56C:

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 56D:

A decision to move forward under NEPA has not yet been approved. Caltrans, as designated NEPA lead by FHWA, has determined that the project potentially qualifies for a Categorical Exclusion under 23 CFR 771.117(c)(3) for construction of bicycle and pedestrian lanes, paths, and facilities; therefore, the project is excluded from public noticing under 40 CFR 1500.11(b). The project is still under review by Caltrans. Should Caltrans determine that there are unusual circumstances or significant environmental effects; an Environmental Assessment or Environmental Impact Statement would be prepared and all NEPA noticing requirements under 40 CFR 1500.11(b) would apply. The Finding of No Adverse Effect is a technical study that was prepared in support of the NEPA document but does not determine if the project will get approved by the NEPA lead.

Response 56E:

The comprehensive definition of 36 CFR 60.4 is included in the regulatory background in Section 2.4 of the EIR:

Criteria for Evaluation

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of significant persons in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded or may be likely to yield, information important in history or prehistory.

The City understands that the rail is eligible for listing on the National Register and acknowledges this information in Section 2.4:

"Thus, the segment within the PAL is a historic property for the purposes of complying with Section 106 of the NHPA and is a historical resource for the purposes of complying with the CEQA."

Response 56F:

The EIR analyzed the environment within the proposed project boundaries and includes a description of the physical environmental conditions in the vicinity of the project area within the Environmental Setting of each section within the EIR.

Example Section, Aesthetics and Visual Resources, Environmental Setting, Page 17:

"The proposed Project is located on the abandoned railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road in the City of Sacramento, Sacramento County, California. The proposed Project is located in the U.S. Department of Agriculture (USDA) Great Valley Ecological Subsection (262A) of the California Dry Steep Province (USDA 2007). The landscape is characterized by low elevation fluvial plains with general land covers of disturbed grasslands, oak woodlands, and urban infrastructure. The land use within the proposed Project corridor is primarily a suburban and urban landscape of residential and commercial land uses, with patches of disturbed natural areas throughout the abandoned railway corridor (see Figure 6 through 11 for existing conditions and Figure 12 for locations of key views). The proposed Project corridor is defined as the area of land that is visible from, adjacent to, and outside the proposed trail right-of-way, and is determined by topography, vegetation, and viewing distance."

Response 56G:

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 with supporting material, such as maps from the Sacramento State Historic Park General Plan and WGBL, are not included within the EIR. 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.

Response 56H:

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. This 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 from 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 Available: http://www.parks.ca.gov/pages/21299/files/osshp%20gp_and_%20eir_final-june%202014.pdf

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

Response 56I:

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 56J:

Anticipated construction equipment listed on page XXV includes "rollers". Groundbourne vibration is discussed within Impact NOS-2 on page 216 of the EIR. A vibratory roller is included within the typical construction equipment used in Table 21. A discussion of vibratory impacts is included in Section 2.10 of the EIR.

Construction activities associated with the proposed Project may also result in ground vibration. Table 21 shows examples of the amount of vibration generated from the types of construction equipment close to a sensitive receptor in terms of Peak Particle Velocity (PPV) at a range of 50 feet. No pile driving or other more intensive noise generation is expected to occur. Table 21 has been updated in the EIR to remove pile driving from the anticipated construction equipment:

Equipment			PPV at 50 ft (in/sec)				
Vibratory Roll	er			0.08			
Hoe Ram				0.031			
Large Bulldoz	er			0.031			
Caisson drillin	g			0.031			
Loaded trucks				0.027			
Jackhammer				0.012			
Small bulldoze	er			0.003			
Source:	Federal	Transit	Administra	ation,	2006.	See	also:
http://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook09.cfm							

 Table 21. Vibration Source Amplitudes for Construction Equipment

Vibration can impact sensitive receptors by causing damage to a structure or by causing annoyance based on human perception. The threshold at which there is a risk of damage to older buildings is

0.3 PPV (in/sec) (Caltrans, 2013). As shown in Table 21 above, none of the activities that would take place during construction have the potential to reach 0.3 PPV (in/sec) to the nearest residence 50 feet away; therefore, no potential for damage would occur.

Construction activities that would take place at least 50 feet from the sensitive receptor would range from Barely Perceptible to Distinctly Perceptible, depending on the distance and intensity of vibration generation. Table 22 outlines the amount of PPV that would potentially cause annoyance to human perception. Vibration from construction activity is typically below the threshold of perception when the activity is more than about 50 feet from the receiver. Considering the low intensity of vibration and the short-term nature of the construction activities near affected sensitive receptors, this impact is not considered substantial and would not require additional minimization measures beyond those outlined below.

 Table 22. Guideline Vibration Annoyance Potential Criteria

	Maximum PPV (in/sec)		
Human Response	Transient Sources	Continuous/Frequent	
		intermittent Sources	
Barely Perceptible	0.04	0.01	
Distinctly Perceptible	0.25	0.04	
Strongly Perceptible	0.9	0.10	
Severe	2.0	0.40	

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: Caltrans Transportation- and Construction-Induced Vibration Guidance Manual (Caltrans 2004)

NOI-1: The following noise control measures will be incorporated into the contract documents for construction of the Project:

- Construction activity that occurs outside the exempt hours of the day (7am to 6pm from Monday through Saturday, and 9am to 6pm on Sundays) that exceeds the 50dBA daytime standard or 45-dBA nighttime standard must obtain the proper variances as outlined in Sections 8.68.250 and 8.68.260 of the City of Sacramento Noise Ordinance.
- Construction equipment and vehicles should be equipped with properly operating mufflers according to the manufacturers' recommendations. Air compressors and pneumatic equipment should be equipped with the manufacturer-recommended muffler, and tools should be equipped with shrouds or shields. An internal combustion engine will not be operated on the job site without the appropriate muffler.
- The use of loud sound signals shall be avoided in favor of light warnings except those required by safety laws for the protection of personnel.

Response 56K:

See page XXVI of the EIR. During the NOP comment period, the public and various government agencies have identified areas of concern that pertain to the proposed Project. General topics raised included: biological resources, water quality, recreation, visual resources, noise, traffic, cultural, archeological, and Native American resources, as well as general permitting concerns. Specific topics raised included:

- Impacts to the Historic Walnut Grove Branch Line of the Southern Pacific Railroad;
- Right of Way;
- Tree Removal; and
- Consideration of Project Alternatives.

The comment letter and supporting documentation provided by Mr. Lukenbill on July 19th was included within the Notice of Preparation public comments in Appendix C of the EIR. As stated by the City at the bottom of the letter in Appendix C, the supporting documentation provided was not attached due to file size; however, all of the documentation is available for public review upon request.

Response 56L:

Dokken Engineering and GPA Consulting's team of technical experts have the qualifications to make unbiased, accurate scientific analysis regarding potential impacts to environmental resources. Additionally, Caltrans environmental staff, who are also qualified professionals, conducted independent reviews of all studies submitted and based their conclusions and approvals on the application of federal regulations and the Section 106 Programmatic Agreement (PA), as well as their academic training and professional experience.

Response 56M:

The City discloses all potential impacts to the abandoned and segmented rail within the proposed project area (see Section 2.4 of the EIR and Figure 3). The project description has been updated to include extensive detail regarding project plans at each intersection, including Sutterville Road. The City has conducted extensive public outreach during preliminary development of the project through the public release of the EIR. See Section 1.6 of the EIR and example letter received on January 3, 2019 from State Parks in response to City outreach.

Edmund G. Brown Jr., Governor

State of California • Natural Resources Agency

DEPARTMENT OF PARKS AND RECREATION P.O. Box 942896 • Sacramento, CA 94296-0001 Lisa Ann L. Mangat, Director

January 3, 2019

The Honorable Darrell Steinberg Mayor, City of Sacramento City Hall 915 I Street, 5th Floor Sacramento, CA 95814

Re: City of Sacramento - Del Rio Trail Project

Dear Mayor Steinberg:

Thank you to you and your staff for the considerable work that you have put into the proposed Del Rio Trail project (Project) in the City of Sacramento (City). I would also like to thank you for considering the protection and preservation of the rails and historic railway corridor in the most recent Draft Environmental Impact Report for the Project.

The Project proposes to construct approximately 4.8 miles of Class 1 multi-use trail along the railway corridor west of Freeport Boulevard from south of Meadowview Road/Pocket Road to the Sacramento River Parkway north of Sutterville Road.

The Department of Parks and Recreation (DPR) holds the right-of-way on portions of property including the railway right-of-way just south of South Land Park Drive north to just before the I-5 railroad bridge and the railway right-of-way adjacent to Freeport Blvd south of I-5 considered as part of the Project. DPR has an established process regarding real property permits and easements and will be reaching out to City staff after the EIR is certified. DPR anticipates that the goals of the City and DPR with regard to the Project will be compatible, including the development of a safe and efficient transportation and recreation trail that protects the historic railway corridor.

Again, thank you for your continued partnership on this important project. We look forward to future discussions with the City regarding the Project after the EIR is certified.

Sincerely,

lisa Cun I Mangal

Lisa Ann L. Mangat Director

Cc: Tom Buford, Principal Planner, City of Sacramento Community Development Department

John Fraser, District Superintendent, Capital District, CA Department of Parks and Recreation

Response 56N:

The EIR analyzes the environmental setting within the proposed project boundaries where construction is proposed to occur. For the purpose of evaluating impacts to a historic resource such as the historic railroad segment, the entire resource is evaluated, and local project related impacts to the resource as a whole are also considered. This evaluation of the WGBL is included in detail in the Finding of No Adverse Effect Report prepared for the project and is summarized in this EIR. The City of Sacramento has concluded that the proposed Del Rio Trail project would have a less than significant impact on the historic WGBL segment in the project area, as well as to the historic resource in its entirety. Outside of the historic resource evaluation, no other environmental analysis is warranted for other segments of the WGBL where no construction would occur, therefore, they have not been included in the PAL.