

## Elite Truck Repair Project (P22-007) Response to Comments Received on the Initial Study/Mitigated Negative Declaration

The Initial Study/Mitigated Negative Declaration (IS/MND) for the Elite Truck Repair Project (proposed project) was circulated for public comment from January 24, 2023 to February 23, 2023. In response to comments received, an additional study was conducted and the IS/MND was recirculated for public comment from September 8, 2023 to October 9, 2023. Written comments were received as follows:

Letter	Date	Commenter
1	2/6/2023	David Swindell Sr, Resident
2	2/20/2023	Tristen Griffith, Resident
3	2/22/2023	Peter Minkel, Central Valley Regional Water Quality Control Board
4	2/23/2023	Molly Wright, Sacramento Metropolitan Air Quality Management District
5	2/23/2023	Saraah Kantner Ried, Resident
6	2/24/2023	L. Hernandez, Resident

The written comments are included as Attachment A. Revisions to the IS/MND have been made based upon comments received during the public review process. Revisions have been made to the Project Description, attachments, and Noise sections.

The responses below include responses to each written comment submitted regarding the proposed project. Where revisions to the IS/MND text are required in response to a comment, new text is double underlined and deleted text is ~~struck through~~.

### **Letter 1: David Swindell Sr, Resident, 2/6/2023**

#### Response to Comment 1-1

At the time of the initial study the existing conditions at the project site did not identify trees for removal by the proposed project. Baseline conditions considered for the initial study are used for analysis in the ISMND. Furthermore, the project includes planting native tree species including oak species. The comment does not address the adequacy of the IS/MND, has been noted for the record, and will be forwarded to the decision-makers as part of their consideration of the proposed project.

#### Response to Comment 1-2

Transportation impacts for the proposed project are addressed beginning on page 62 of the recirculated IS/MND. As stated therein, the proposed project would not result in significant impacts related to transportation and circulation. A Vehicle Miles Traveled (VMT) Analysis was prepared for the proposed project. The proposed project meets OPR's Technical Advisory and the City of Sacramento screening threshold for retail smaller than 50,000 square feet.

The project is expected to access the surrounding roadway network via Rene Avenue to the south of the project site which connects to Pinell Street to the west and Winters Street to the east. Rene Avenue is a straight east-west roadway with a 25 miles per hour speed limit. The proposed project has been designed to ensure adequate ingress and egress and allow for adequate sight distances. Condition of surrounding streets is not within the scope of CEQA analysis. The commenter's concerns have been noted for the record, and will be forwarded to the decision-makers as part of their consideration of the proposed project.

**Letter 2: Tristen Griffith, Resident, 2/20/2023**

Response to Comment 2-1

The comment states that the proposed project could impact nearby business demand. Potential impacts to surrounding business are not included within the scope of CEQA analysis. The comment does not address the adequacy of the IS/MND.

Response to Comment 2-2

Please refer to Response to Comment 1-2. The commenters concerns were in regard to traffic from trucks within residential streets. The commenters concerns have been noted for the record and will be forwarded to the decision-makers as part of their consideration of the proposed project.

**Letter 3: Peter Minkel, Central Valley Regional Water Quality Control Board, 2/22/2023**

Response to Comment 3-1

The comment provides background information regarding applicable regulations and required permits. The project would comply with the Construction Storm Water General Permit and a project specific Storm Water Pollution Prevention Plan would be prepared. The project does not involve any discharges that would require the project to obtain a Section 404 permit from the U.S. Army Corps of Engineers, a Section 401 Water Quality Certification or waste discharge requirements from the Regional Water Quality Control Board. The project would comply with all applicable regulations. The comment does not include any project specifics to address the adequacy of the IS/MND, has been noted for the record, and will be forwarded to the decision-makers as part of their consideration of the proposed project.

**Letter 4: Molly Wright, Sacramento Metropolitan Air Quality Management District, 2/23/2023**

Response to Comment 4-1

The comment is an introductory statement and does not address the adequacy of the IS/MND.

Response to Comment 4-2

As noted in the project description, services included at the proposed facility would include general maintenance activities, such as oil changes, brake servicing, alignments, and tire changes. No major servicing activities that would require the frequent idling of trucks at the service bay are anticipated to be required. Nonetheless, to be conservative, the HRA assumed 5 minutes idling/truck at the service bay, as well as, 5 minutes idling/truck within the truck parking areas. Furthermore, as noted in the project description, the proposed facility is anticipated to service electric vehicles. The HRA prepared for the project conservatively assumed that 100 percent of all trucks (208 truck trips/day) would be diesel-fueled. Based on these conservative assumptions, predicted health risks at the nearest off-site sensitive land use was 2.89 in a million, which is below the SMAQMD's threshold of 10 in a million. For these reasons, predicted health risks would not exceed SMAQMD's significance thresholds. This impact would remain less than significant and further analysis and mitigation is not required.

Response to Comment 4-3

See Response to Comment 4-2. Commenter recommends that the qualitative analysis of

exposure of sensitive receptors to substantial pollutant concentrations clarify that the HRA's 208 truck trips per day estimate applies entirely to truck trips. The comment does not address the adequacy of the IS/MND.

#### Response to Comment 4-4

The comment refers to an earlier recommendation by SMAQMD to incorporate landscaping along the perimeter. The project includes landscaping features along all sides of the parameter of the project. Tree species selected for landscaping fit within the Landscaping Guidance by SMAQMD. The comment does not address the adequacy of the IS/MND.

#### Response to Comment 4-5

As noted on page 27 of the IS/MND, the project would be required to implement the SMAQMD's Best Management Practices (BMPs) related to dust control. The City will require implementation of the BMPs through a condition of project approval.

#### Response to Comment 4-6

The comment is a concluding statement and does not address the adequacy of the IS/MND.

### **Letter 5: Saraah Kantner Ried, Resident, 2/23/2023**

#### Response to Comment 5-1

The comment is an introductory statement and does not address the adequacy of the IS/MND.

#### Response to Comment 5-2

The City of Sacramento 2035 General Plan can be accessed through the following link:  
<https://www.cityofsacramento.org/Community-Development/Resources/Online-Library/2035--General-Plan>

The City of Sacramento 2035 General Plan Draft Master Environmental Impact Report can be accessed through the following link:

<https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Environmental-Impact-Reports/2035-GP-Update/Public-Draft-MEIR081114.pdf?la=en>

The 2035 General Plan Draft Master Environmental Impact Report appendices can be accessed through the following link:

[https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Environmental-Impact-Reports/2035-GP-Update/2035-Draft-MEIR-Appendices\\_Combined.pdf?la=en](https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Environmental-Impact-Reports/2035-GP-Update/2035-Draft-MEIR-Appendices_Combined.pdf?la=en)

The 2035 General Plan Draft Final Master Environmental Impact Report can be accessed through the following link:

[https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Environmental-Impact-Reports/2035-GP-Update/2035-GPU-FinalMEIR\\_02242015.pdf?la=en](https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Environmental-Impact-Reports/2035-GP-Update/2035-GPU-FinalMEIR_02242015.pdf?la=en)

The comment does not address the adequacy of the IS/MND in determining significant effect.

#### Response to Comment 5-3

The comment expresses concern in relation to noise impacts related to service bay doors

proposed along the southern façade of the building, facing nearby residences. The recirculated IS/MND included a Noise Impact Assessment prepared for the proposed project (Attachment B). The assessment identifies potential impacts associated with operational noise levels at nearby residential land uses. The recirculated IS/MND includes an updated project description with no service bay doors constructed along the southern building façade. The foregoing revisions provide an updated project description, but do not change the conclusions of the IS/MND.

#### Response to Comment 5-4

The comment refers to the current zoning of Light Industrial/Special Planning District (M-1-SPD) in relation to residential land uses of the area. The project site is located in an urbanized portion of the community. The project site is bordered by industrial buildings to the north, east, and west. The Sacramento 2035 General Plan designates the project site as Employment Center Low Rise. The project site has been designated for urban development in the 2035 General Plan and the Planning and Development Code, and the proposed development is consistent with these planning designations. The comment does not address the adequacy of the IS/MND, has been noted for the record, and will be forwarded to the decision-makers as part of their consideration of the proposed project.

#### Response to Comment 5-5

Please refer to Response to Comment 5-4. The proposed project is consistent with the 2035 General Plan and the Planning and Development Code. The commenter's concerns have been noted for the record, and will be forwarded to the decision-makers as part of their consideration of the proposed project.

#### Response to Comment 5-6

As stated on page 17 of the IS/MND, new development permitted under the 2035 General Plan would add sources of light that are similar to the existing urban light sources. Furthermore, new development allowed under the 2035 General Plan would be subject to General Plan policies, building codes, and design review, all of which would ensure that new sources of light within the project site would be properly designed so as not to result in substantial increases in light or spillover of light into adjacent parcels. The proposed project would have no additional significant environmental effects related to sources of glare.

#### Response to Comment 5-7

In response to this comment, a Noise Impact Assessment was prepared for the proposed project (Attachment B). The assessment identifies potential impacts associated with operational noise levels at nearby residential land uses.

Operational noise impacts were evaluated in the Noise Impact Assessment. The following assessment was included in response to checklist questions A and B for assessing noise related impacts in the recirculated IS/MND:

##### Operation

Operational noise would primarily come from the use of pneumatic tools and air compressors, which are the loudest equipment anticipated to be used onsite. According to the noise level modeled in the Noise Impact Assessment, predicted operation noise levels at the property lines of residential land uses nearest to the proposed project, would range from approximately 43 to 66 dBA Leq. Predicted operational noise levels at two nearby residential land uses would exceed the City's

daytime noise standard of 55 dBA Leq. Additionally, predicted operational noise levels at four nearby residential land uses would exceed the City's nighttime noise standard of 50 dBA. The Noise Impact Assessment includes several recommended measures to reduce noise levels below the City of Sacramento daytime noise standard of 55 dBA Leq. These measures have been incorporated as project design features and include no service bay doors constructed along the southern building façade, installation of the noise barrier fences described in the project description, fully enclosing air compressors, and operating the business during daytime hours. Predicted operational noise levels at the property lines of residential land uses with the incorporation of the project features, would range from approximately 39 to 54.6 dBA. With inclusion of project design features discussed above, predicted operational activities associated with the proposed truck repair facility would not exceed the City's daytime noise standard of 55 dBA.

Predicted operational noise levels were determined for edge of residential property lines closest to the project. As such, the intervening distance to the residence would further reduce the predicted noise levels of the project. Residential interior noise levels will be lower than exterior noise levels, The exterior walls of residences would further reduce predicted noise levels. According to the U.S. Department of Housing and Urban Development Sound Transmission Class (STC) Guidance<sup>1</sup> commonly constructed exterior walls found in single-family residences have a STC rating between 35 and 49. The STC rating measures the sound absorption of a material (i.e. an exterior wall with a STC of 35 would reduce an external noise by approximately 35 decibels) and with predicted exterior noise levels at edges of nearby residences ranging between 39 to 54.6 dBA, expected interior noise levels would be below 45 dBA through attenuation by the walls of the residences.. Therefore, the proposed project would not result in residential interior noise levels of 45 dBA or greater.

Buildout of the project site was previously considered in the Master EIR. The proposed project would be consistent with the General Plan land use designation for the site. The proposed project as redesigned based upon the Noise Impact Assessment would not be anticipated to result in increased noise levels beyond the levels previously anticipated in the Master EIR. Consequently, project-related noise would not result in the exposure of interior or exterior spaces to noise levels in excess of the City's standards beyond what was previously analyzed in the Master EIR and no additional significant environmental effects would result.

With the implication of the measures identified in the Noise Impact Assessment, which have been incorporated as project design features and include no service bay doors constructed along the southern building façade, installation of the noise barrier fences, fully enclosing air compressors, and operating the business during daytime hours. does not change the conclusions of the IS/MND.

#### Response to Comment 5-8

The comment is a concluding statement and does not address the adequacy of the IS/MND.

#### **Letter 6: L. Hernandez, Resident, 2/24/23**

#### Response to Comment 6-1

The drainage from the bio-retention area will connect to manhole as a condition of approval for the project. The comment does not address the adequacy of the IS/MND, and will be forwarded

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<sup>1</sup> U.S. Department of Housing and Development. [https://www.hud.gov/sites/documents/DOC\\_16419.PDF](https://www.hud.gov/sites/documents/DOC_16419.PDF)

to the decision-makers as part of their consideration of the proposed project.

Response to Comment 6-2

See Response to Comment 6-1.

**Attachment A**  
**COMMENT LETTERS**

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**From:** [David Swindell Sr](#)  
**To:** [Ron Bess](#)  
**Subject:** Mitigated negative declaration  
**Date:** Monday, February 6, 2023 12:35:43 AM

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1-1

Elite truck repair project came into the proposed site and removed a heritage oak tree (over a hundred years old). Also several others. When confronted I was told that he had bought the property and he would do as he pleased. I told him I don't know where he was from, but here in California a permit was required to do anything to a heritage oak tree. It was removed anyway! I reported him to the environmental protection agency. That property is a natural fly way for many birds and small game. Speaking with

1-2

My neighbors, none want this project to proceed. Rene Ave is not a through fare to support large trucks. Also with Veralee lane being a dead end street. We already have rigs backing in to turn around. I can only imagine the added stress on the neighborhood. These streets are already crumbling away. Last year my mother in law fell going to the mailbox when a piece of asphalt gave way under her feet. Had it been me I would have sued the city. Please don't let this project ruin a somewhat quiet neighborhood! Thank you!



**From:** [Tristen Griffith](#)  
**To:** [Ron Bess](#)  
**Subject:** Elite Truck Repair Project (P22-007) public comment  
**Date:** Monday, February 20, 2023 2:06:34 PM

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Dear Mr. Bess,

2-1

I am writing to you regarding the proposed Elite Truck Repair Project in the City of Sacramento. My family owns the Sacramento 49er Travel Plaza. We have successfully run a full service travel plaza including a Truck Service Center for over 50 years and I am concerned that if this Truck Repair Project is built that it would have a direct and negative impact on our business specifically our Service Center. We have invested millions of dollars in both our business and community over the years. Recently we have struggled with finding/hiring employees/mechanics to work at our facility. Not only am I concerned that this project could impact our current business demand, but also further amplify our desperate need for mechanics. Elite Truck Repair is planning to build less than 6 miles from our facility and will attract the same labor market and truck drivers/repairs needed as ours. This will be a direct competition of which we are already struggling to fill our empty job openings and further decrease our revenue from taking business away from our facility. In fact, our business has declined over the years and this will high light an even greater decline by transitioning business away from our facility. Finally, this project will create an even greater need for mechanics that are already in severe short supply.

2-2

I encourage you to listen to your neighboring communities as there is always a loud concern regarding safety in neighborhoods and the increase in trucks driving around kids, homes, play facilities and schools.

I am happy to discuss further should you wish.

Thank you for your consideration.

Regards,

Tristen Griffith  
President  
[Sacramento 49er Travel Plaza](#)  
2828 El Centro Rd.  
Sacramento, CA 95833  
Office: (916) 927-4774, ext. 253  
Fax: (916) 923-1652  
email: [tgriffith@sacramento49er.com](mailto:tgriffith@sacramento49er.com)  
Web: [www.sacramento49er.com](http://www.sacramento49er.com)

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## Central Valley Regional Water Quality Control Board

22 February 2023

Ron Bess  
City of Sacramento  
300 Richards Boulevard, Third Floor  
Sacramento, CA 95811  
[Rbess@cityofsacramento.org](mailto:Rbess@cityofsacramento.org)

### **COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, ELITE TRUCK REPAIR (P22-007) PROJECT, SCH#2023010445, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 23 January 2023 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Elite Truck Repair (P22-007) 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. 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

3-1  
cont.

3-1  
cont.

**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 (USACE). If a Section 404 permit is required by the USACE, 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 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 USACE at (916) 557-5250.

**Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACE 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. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/](https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/)

**Waste Discharge Requirements – Discharges to Waters of the State**

If USACE 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 Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: [https://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_surface\\_water/](https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/)

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

**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 Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. 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 Threat 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/wqo2003-0003.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf)

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:  
[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2018-0085.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf)

**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 *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076-01.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.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: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

Elite Truck Repair (P22-007) Project - 5 -  
Sacramento County

22 February 2023

3-1  
cont.

If you have questions regarding these comments, please contact me at (916) 464-4684  
or [Peter.Minkel2@waterboards.ca.gov](mailto:Peter.Minkel2@waterboards.ca.gov).

*Peter Minkel*

Peter Minkel  
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,  
Sacramento

SACRAMENTO METROPOLITAN



February 23, 2023

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

**Subject: Elite Truck Repair (State Clearinghouse #2023010445)**

Dear Ron Bess:

4-1

Thank you for providing the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) with the opportunity to review the [Mitigated Negative Declaration \(MND\) for the Elite Truck Repair Project](#) under the California Environmental Quality Act (CEQA). This project includes the construction of a new 20,850 square foot truck service facility to provide minor truck service, truck parking, warehouse space, and administrative office space on a 4.99-acre site located at 2041 Rene Avenue in the City of Sacramento. Sac Metro Air District offers the project comments below, on air quality and climate considerations for project implementation and CEQA review consistent with methods recommended in our [Guide to Air Quality Assessment in Sacramento County](#) (CEQA Guide), available on our website.

4-2

**Toxic Air Contaminants - Operations**

The MND finds the impacts of public exposure to pollution including [toxic air contaminants](#) to be less than significant for project operations. The MND incorporates a Health Risk Assessment (HRA) analysis demonstrating that cancer risk associated with public exposure to project operational emissions is below a significance threshold of 10 in 1 million.

- Sac Metro Air District recommends modifying the HRA truck idling assumptions to account for idling that occurs while trucks are being repaired. The HRA indicates that “On-site idling of trucks was included and assumed an idle time of 5 minutes per truck in accordance with ARB [California Air Resources Board] regulatory requirements.” Please note that ARB idling requirements, found in CCR Title 13, Division 3, [Chapter 9, Article 4.8, §2449\(d\)\(2\)](#) and [Chapter 10, Article 1, §2485](#), include an exception for trucks that are being serviced. Therefore, we recommend changing the HRA idling assumptions to account for trucks parked in the five service bays idling during working hours.

4-3

The MND includes a qualitative analysis of the impacts of exposure of sensitive receptors to substantial pollutant concentrations from project operations. According to the MND, “The low number of trips combined with the short-term, intermittent, temporary nature of these trips and the highly dispersive properties of DPM [diesel particulate matter] would limit the potential of sensitive receptors along Rene

4-3  
cont.

Avenue, including Bell Avenue Elementary School and Robla Preschool, and the single-family residences along Rene Avenue being exposed to high concentrations of DPM for any extended amount of time from heavy duty vehicles accessing the site.”

To describe the number of truck trips, the MND indicates that “According to the trip generation rate for the project from the [CalEEMod](#) output and references from the [SANDAG](#), it would generate between 103 and 208 daily trips during the week ... These trips would not be all heavy-duty vehicle trips as trip generation takes into account small duty vehicles that would visit the site.”

4-4

- Sac Metro Air District recommends that the qualitative analysis of exposure of sensitive receptors to substantial pollutant concentrations clarify that the HRA’s 208 truck trips per day estimate applies entirely to truck trips. We further recommend that the analysis reference the ARB’s [Air Quality and Land Use Handbook: A Community Health Perspective](#) text on siting sensitive land uses near facilities that accommodate more than 100 trucks per day.
- Sac Metro Air District reiterates the recommendation, from our March 2022 project correspondence, to incorporate planting strips around the entire north, west, and east perimeter, using tree species selected from Sac Metro Air District’s [Landscaping Guidance for Improving Air Quality Near Roadways](#) (Landscaping Guidance), available on our website. Trees in the landscaping strips should be planted as closely together as the species will allow.

4-5

**Construction**

All projects are subject to Sac Metro Air District rules and regulations in effect at the time of construction. Please visit our website to [find a list of the most common rules that apply at the construction phase of projects](#). As a reminder, this project is subject to CEQA [mitigation measures for construction-related air quality impacts for the McClellan Heights and Parker Homes Special Planning District](#), which includes measures from Sac Metro Air District’s [Basic Construction Emission Control Practices](#), measures to ensure construction equipment efficiency and further control equipment emissions, and possible mitigation fees.

4-6

**Conclusion**

Thank you for your attention to our comments. If you have questions about them, please contact me at [mwright@airquality.org](mailto:mwright@airquality.org) or 279-207-1157.

Sincerely,



Molly Wright, AICP  
Air Quality Planner / Analyst

c: Paul Philley, AICP, Program Supervisor, Sac Metro Air District

**From:** [Ron Bess](#)  
**To:** [Kantner, Saraah@DOT](#)  
**Cc:** [Donna K](#); [fireandnoise@gmail.com](#); [farr499@gmail.com](#)  
**Subject:** RE: Elite Truck Repair Project (P22-007) comments on IS/MND  
**Date:** Thursday, February 23, 2023 12:57:00 PM

Thank You for your comments. We'll add them to the administrative record.

**From:** Kantner, Saraah@DOT <Saraah.Kantner@dot.ca.gov>  
**Sent:** Thursday, February 23, 2023 12:23 PM  
**To:** Ron Bess <RBess@cityofsacramento.org>  
**Cc:** Donna K <sacto.donna@gmail.com>; [fireandnoise@gmail.com](#); [farr499@gmail.com](#)  
**Subject:** Elite Truck Repair Project (P22-007) comments on IS/MND

Hello,

I am submitting these comments on behalf on myself and several neighbors located within the area of project and construction impacts. Residents in the area request that a public meeting be held so they may have to opportunity to ask additional questions and have them answered by the City about the detrimental impacts of such a large project on a largely residential area. Concerned residents include those living at the following addresses:

5-1

2030 Rene Ave  
4120 Dayton Ave  
2125 Rene Ave  
2128 Rene Ave  
2132 Rene Ave  
2129 Rene Ave  
4229 Barbara St  
2147 Rene Ave

Comments on the analysis and conclusions in the Initial Study/Mitigated Negative Declaration are included below.

5-2

1. No link to the City of Sacramento 2015b. Sacramento 2035 General Plan Master Environmental Impact Report, which is cited several times but no link was provided. This lack of transparency made it difficult for local resident to access the document that many conclusions were based on in the environmental document. A copy or link was inquired about from Ron Bess via telephone and a voicemail was left, no outreach from the city was received on how to best access the Sacramento 2035 General Plan Master Environmental Impact Report when all other reference links and locations did not work.

5-3

2. Indicated activities include maintenance, oil changes, brake service, alignments and tire changing. Alignments, brake service and tire changing are all not specific to electric vehicles, and are very noisy during the day when the bays are kept open, as they always are.

5-4

3. Though the project site itself has been rezoned as Light industrial, it was originally a residential property location. Although that is the current zoning it does not reflect the character of the neighborhood where there is an elementary school that sees children walking in the neighborhood, as well as the residential uses of the area.

5-5

4. Project is located in the Del Paso DRD, and as such the Design Review Code



(Sacramento City Code Chapter 17.132) development applications are reviewed to ensure that:

The desirability of adjacent and surrounding properties is enhanced;  
The benefits of occupancy of adjacent and surrounding properties are improved;  
The value of surrounding properties is increased;  
Appropriate development of adjacent and surrounding properties is encouraged; and  
The maintenance and improvement of surrounding properties is encouraged, resulting in the enhancement of the health, safety, aesthetics, and general welfare of the inhabitants of the area and the inhabitants of the city at large.

5-5  
cont.

Recent aggressive industrial development within the area has led to an increase in traffic specifically from industrial and commercial vehicles which make navigation along largely residentially planned roadways unsafe for residential uses and particularly of concern for the elementary school located 600 ft from the project site. Although the neighboring parcels are zones light industrial, the surrounding neighborhood at large is residential, which is not adequately taken into consideration in the CEQA document.

As a resident of this area living within 600 ft of the proposed project, This project, like other light industrial development projects in the area, will not: increase desirability nor the benefit of the adjacent and surrounding properties; increase value of surrounding property; enhance of the health, safety, aesthetics, and general welfare of the inhabitants of the area and the inhabitants of the city at large.

5. Aesthetics 1A: Create a source of glare that would cause a public hazard or annoyance?

Given the project site is vacant there are no existing sources of light and glare within the project site.

This is asking if the proposal (new development would create a source of glare that would cause a hazard/annoyance, not whether the vacant sites' current conditions would cause an aesthetic annoyance the proposed project.

5-6

The proposed project will cause a glare to current residential neighbors through nighttime lighting as current industrial complexes in the area do. This would further compound the light pollution that plagues the neighborhood.

Aesthetics 1B: Create a new source of light that would be cast onto oncoming traffic or residential uses?

Residential issues not analyzed. Lighting from industrial sources is a current concern and would only be compounded by the proposed project. How much additional lighting is being proposed by the project proponent? Please provide number of outdoor lights planned and the lumens. Please conduct a lighting analysis for the increase in light spill from the propose project if applicable. Mitigation measures ensuring low light spill and modified lighting shields.

6. Noise 1A: Result in exterior noise levels in the project area that are above the upper value of the normally acceptable category for various land uses due to the project's noise level increases?

5-7

Rationale use for noise levels do not take into account the actual daily functioning of the shop, which would produce more noise that just truck movement, but would

5-7  
cont.

include noise from car repair maintenance. It is unreasonable to assume that the maintenance bays will be used while they are closed, as common sense dictates that the roll-up doors for vehicle repair are always rolled up and open to the environment while vehicle repair is done.

There will be noise from multiple air-compressor tools and potentially hydraulic car lifts which need to be analyzed. Indicated activities include maintenance, oil changes, brake service, alignments and tire changing. Tire changing is specifically very noisy, as anyone who has went to a shop can attest. This daily increase in noise that will come from the operation of a heavy equipment repair shop has not been fully analyzed. Additionally the idea that keeps being put forth that this will be located in a "light industrial zone" is faulty. It is located in a majority residential area, at the very edge of a light industrial zone.

Impacts from the recently approved site around the corner (DR21-124) At the 4220 Pinnell Street site development have not been accounted for in the overall net increase in vehicle traffic.

5-8

Thank you for your time,

**Saraah Kantner Reid** (she/her)  
Environmental Scientist  
Environmental Program/Project Management  
Caltrans - District 4  
Cell: (510) 507-9627

**ELITE TRUCK REPAIR PROJECT (P22-007)**  
INITIAL STUDY

McClellan Heights and Parker Homes Special Planning District. The proposed project would be consistent with the current zoning and with the 2035 General Plan designation of Employment Center Low Rise.

Site Access and Parking

Regional access to the project site would be provided by Interstate 80 (I-80), which is located approximately 0.35-mile south of the project site. Primary site access would be provided from Rene Avenue by one proposed 45-foot-wide driveway centrally located along the southern frontage of the project site. The driveway would provide access to the loading and parking areas associated with the facility. Implementation of the proposed project would include roadway frontage improvements including sidewalk, curb, gutter, and planter strip along Rene Avenue that would tie to existing facilities to the east and west.

The proposed project would include approximately 20 car parking spaces which includes 1 Americans with Disabilities Act (ADA) compliant space and 60 truck parking spaces. Car parking spaces would be situated along the southern portions of the parcel, while the truck parking spaces would be situated along the north portion and the northern parts of the east and west portions of the site.

Utilities

A 10-inch sewer line and an 8-inch water line are present within the Rene Avenue south of the project site. Overhead electrical facilities are found at the front of Rene Avenue. Implementation of the proposed project would include connecting the proposed structure to the existing utility infrastructure within the Rene Avenue ROW.

They are proposing to connect to an existing drain inlet, which it is not allow. If they cannot connect to the existing manhole, they will required to do a drainage main extension, please see conditions of approval.

6-1

Stormwater within the site would be directed to a bio-retention area located along the eastern and northeastern corner of the site. The bio-retention area contains two drainage inlets connected to a 12-inch perforated drain pipe. The 12-inch drain pipe would be connected to the City's existing 42-inch stormwater drain located within the Rene Avenue ROW near its intersection with Dayton Street. A 10-foot buffer would surround the bio-retention area on all sides, separating it from the adjacent parcels on the north and east, the parking lot to the west, and the sidewalk and frontage improvements to the south. (Figure 4).

Landscaping and Fencing

New landscaping including trees, shrubs, and groundcover will be placed around the perimeter of the project site. All plants utilized in landscaping are listed as low or very low water users in the State of California Water Use Classification of Landscape Species database. It is anticipated trees will be planted along the perimeter surrounding the proposed project. Additionally, it is anticipated shrub and groundcover species will be interspersed with the trees. The bio-retention area will be vegetated and is anticipated to include manzanita, sedge, deer grass, and California rose.

Fencing will be utilized to secure the facility. Perimeter fencing at interior property lines will be 6-foot-high chain link with razor wire. Fencing facing Rene Avenue will be 6-foot-high steel tube fencing. A security gate will be present on the east side of the metal building to secure the back parking area and truck entry to the metal building. The gate will be a 35-foot-wide sliding gate. A concrete block trash enclosure with metal gates will be present along the eastern boundary of the parcel adjacent to the security gate.

Project Approvals

The proposed project includes the following discretionary entitlement approvals from the City of Sacramento:

- California Environmental Quality Act (CEQA) Approval through an Addendum to the 2035 General Plan Master EIR or adoption of an Initial Study/Mitigated Negative Declaration; and
- Approval of Site Plan and Design Review

ELITE TRUCK REPAIR PROJECT (P22-007)  
INITIAL STUDY

Issues:	Effect will be studied in the EIR	Effect can be mitigated to less than significant	No additional significant environmental effect
7. <u>HYDROLOGY AND WATER QUALITY</u> Would the project:			
A) Substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increases in sediments and other contaminants generated by construction and/or development of the project?			X
B) Substantially increase the exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood?			

The project site does not front drainage infrastructure.

6-2

**ENVIRONMENTAL SETTING**

The proposed project is located in a developed area of Sacramento. The proposed project is currently vacant and does not contain any impervious surface. Stormwater runoff is handled by existing City stormwater infrastructure located within the Rene Avenue right of way.

The City of Sacramento's Grading Ordinance requires that development projects comply with the requirements of the City's Stormwater Quality Improvement Plan (SQIP). The SQIP outlines the priorities, key elements, strategies, and evaluation methods of the City's Stormwater Management Program. The Program is based on the NPDES municipal stormwater discharge permit. The comprehensive Program includes pollution reduction activities for construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations. In addition, before the onset of any construction activities, where the disturbed area is one acre or more in size, projects are required to obtain coverage under the NPDES General Construction Permit and include erosion and sediment control plans. BMPs may consist of a wide variety of measures taken to reduce pollutants in stormwater and other non-point source runoff. Measures that reduce or eliminate post-construction-related water quality problems range from source controls, such as reduced surface disturbance, to treatment of polluted runoff, such as detention or retention basins. The City's SQIP and the Stormwater Quality Design Manual for the Sacramento Region<sup>j</sup> include BMPs to be implemented to mitigate impacts from new development and redevelopment projects, as well as requirements for low impact development (LID) standards, in compliance with the City's Municipal Separate Storm Sewer System (MS4) permit requirements.

The Federal Emergency Management Agency (FEMA) publishes Flood Insurance Rate Maps (FIRMs) that delineate flood hazard zones for communities. The project site is designated by FIRM Panel Number 06067C0068H as being located within an area designated as Zone X. Zone X is an area of minimal flood hazard, outside of the special flood hazard area and higher than the elevation of the 0.2-percent annual chance flood.

Section 13.08.145 of the Sacramento City Code (Mitigation of drainage impacts; design and procedures manual for water, sanitary sewer, storm drainage, and water quality facilities) requires that when a property would contribute drainage to the storm drain system or combined sewer system, all stormwater and surface runoff drainage impacts resulting from the improvement or development must be fully mitigated to ensure that the improvement or development does not affect the function of the storm drain system or combined sewer

<sup>j</sup> Sacramento Stormwater Quality Partnership. *Stormwater Quality Design Manual for the Sacramento Region*. 2014