

January 10, 2014

VIA OVERNIGHT AND EMAIL: DAllen@cityofsacramento.org

Dana Allen, Associate Planner
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Blvd., Third Floor
Sacramento, CA 95811

Re: Draft Environmental Impact Report for The McKinley Village Project (P08-086)

Dear Ms. Allen:

This firm represents East Sacramento Residents for a Better Community (“ESRBC”). ESRBC is a growing grassroots organization of East Sacramento residents who are committed to preserving and enhancing the quality of life in East Sacramento—in part, by ensuring that a sensible, comprehensive approach is taken to planning and land use decisions affecting East Sacramento. On behalf of ESRBC, I hereby submit the following comments on the Draft Environmental Impact Report (“DEIR”) for the McKinley Village Project (the “Project”).

As outlined below, and more specifically discussed in the attached comments prepared by Terra Nova Planning & Research, Inc. (“Terra Nova”), a professional planning and CEQA firm, and Hexagon Transportation Consultants, Inc. (“Hexagon”), a traffic engineering firm (attached hereto, respectively, as Exhibits A and B), ESRBC has concluded that the DEIR is deficient in a number of areas and must be substantially revised in order to permit meaningful evaluation of the Project and to comply with CEQA. Further, the DEIR fails to identify and evaluate feasible mitigation measures and alternatives to the proposed Project. As a result of these concerns, ESRBC opposes the Project, as currently defined, at this time.

We respectfully request the City revise the DEIR to address the shortcomings identified in these comments, including the attached comments prepared by Terra Nova and Hexagon, and that the DEIR be re-circulated to provide a more complete disclosure of the potential environmental consequences of the Project to the public and the City’s decisionmakers. We further request that the City provide detailed responses to each of the specific comments raised herein and/or by Terra Nova and Hexagon in the City’s Response to Comments.

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The DEIR Fails to Disclose or Mitigate the Project's True Traffic Impacts

Because ESRBC members live and work and are engaged in East Sacramento, an area that already suffers from significant traffic problems, the DEIR's traffic analysis is of particular concern to ESRBC. Unfortunately, as detailed in the comments prepared by both Terra Nova and Hexagon, the DEIR's discussion of traffic impacts is technically deficient and incomplete.

For example, the DEIR fails to analyze impacts to several residential streets that are likely to experience significant increases in traffic volume due to the project. Indeed, Hexagon opined that traffic on 33rd Street could increase by as much as 67%, which would undoubtedly impact the quality of life for residents who live in that neighborhood. It is critical that the DEIR's traffic discussion be expanded to include all of the roadway segments and intersections identified by Hexagon and/or Terra Nova as inadequately analyzed. (*See* Hexagon Comments, p. 1, Terra Nova Comments, pp. 29-32.) To the extent such evaluation discloses additional significant impacts, the City is required to consider feasible mitigation measures and project alternatives to reduce such impacts. (CEQA Guidelines §§ 15126.4, 15126.6.)

The DEIR also fails to identify and require appropriate measures to mitigate the traffic impacts it identifies. For example, as explained by Hexagon, the DEIR fails to disclose that mitigation measures proposed to reduce significant traffic impacts at the intersections of H Street/Alhambra and E Street/Alhambra would require the elimination of bicycle lanes—an outcome that is utterly inconsistent with the stated Objective of creating a “development that promotes bicycle use and provides bicycle and pedestrian access to downtown and other surrounding neighborhoods.” (DEIR, p. 2-8.) Further, the elimination of bicycle lanes would be counter to state-mandated “Complete Streets” policies, and would itself constitute a significant transportation impact. (*See, e.g.*, CEQA Guidelines, Appendix G, XVI (a), (f).) Mitigation measures that require the elimination of bicycle lanes should thus be considered infeasible, and alternative mitigation measures should be identified. If no feasible alternative measures exist, then the impacts to H Street/Alhambra and E Street/Alhambra constitute significant, unavoidable traffic impacts that must be properly identified and disclosed.

The issues described above are merely examples of the numerous problems with the DEIR's traffic discussion set forth in detail in the comments provided by Terra Nova and Hexagon. The DEIR's traffic section contains serious defects that have the effect of depriving the public of vital information about the Project's traffic impacts. Accordingly, we respectfully request that the City make a serious effort to address all of the concerns raised by Terra Nova and Hexagon, and thereafter re-circulate a document that more accurately discloses the true impacts of the Project.

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The DEIR Understates Numerous Other Potential Impacts

Terra Nova identified numerous other areas in which the EIR significantly understates significant impacts and/or provides insufficient mitigation measures. These include impacts associated with General Plan consistency, air quality and related health risks, flooding, and noise. Each of the deficiencies identified in the Terra Nova comments should be addressed in a revised DEIR.

The DEIR Is Required to Analyze and Mitigate All Significant Impacts to Future Occupants of the Project

The CEQA Guidelines expressly require that an EIR “analyze any significant environmental effects the project might cause by bringing development and people into the area affected.” (Guidelines, § 15126.2.) Nonetheless, the DEIR repeatedly cites *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455 (“*Ballona*”) for the proposition that the City has no obligation to consider the impacts to future residents of the Project created by placing the Project in an area subject to numerous “preexisting environmental hazards.” Reliance on *Ballona* for such a broad proposition is improper, as subsequent Court of Appeal decisions have declined to reach the issue of whether CEQA requires consideration of impacts that affect only future users of a project. (See, e.g., *Parker Shattuck Neighbors v. Berkeley City Council* (2013) 2013 Cal. App. LEXIS 1052 [declining to “decide whether the potential effects of a physical change that poses a risk only to the people who will construct and reside in a project may ever be deemed significant”].)

Moreover, putting aside the issue of whether CEQA requires the City to consider impacts to future residents of the Project, good public policy and transparency demand that the City do so, in order to ensure that its residents are not placed in harm’s way. As discussed in the Terra Nova comments, the Project’s proximity to I-80 and the rail lines creates numerous potential impacts to future residents—including health impacts, public safety impacts, and noise impacts—that have not been adequately analyzed or mitigated.

Conclusion

ESRBC’s review of the DEIR leads it to the conclusion that the DEIR suffers from numerous and significant deficiencies, which necessitate revision and recirculation. “A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term ‘information’ can include changes in the project or environmental setting as well as additional data or other information.” (CEQA Guidelines Section 15088.5(a).)


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In this case, the DEIR must be revised to address the numerous deficiencies set forth in the Terra Nova and Hexagon comments. As noted above, these deficiencies include the failure to disclose that proposed traffic mitigation measures will themselves have undisclosed significant impacts and are infeasible. The DEIR likewise understates numerous significant impacts in a variety of areas. Correcting these deficiencies will generate significant new information that must be shared with the public before any final EIR is certified, or the Project is approved.

Thank you for considering our comments and this letter.

Very truly yours,

RUTAN & TUCKER, LLP


Ash Pirayou

AP:bpv

Attachments:

- Exhibit A: Terra Nova Planning & Research, Inc. Comment Letter
- Exhibit B: Hexagon Transportation Consultants, Inc. Comment Letter

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EXHIBIT A



TERRA NOVA PLANNING & RESEARCH, INC.

January 3, 2014

Ms. Dana Allen
Associate Planner
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

RE: City of Sacramento McKinley Village Environmental Impact Report (SCH #2008082049)

Dear Ms. Allen:

This letter has been prepared as a result of our review of the McKinley Village Project Environmental Impact Report (EIR) (SCH #2008082049) on behalf of the East Sacramento Residents for a Better Community. The following discussion addresses our concerns regarding the content of the EIR on a categorical basis, based on the requirements of the California Environmental Quality Act (CEQA).

Understanding of the Project

The applicant is seeking a General Plan Amendment, Rezone, Planned Unit Development, and various subdivision maps to allow the development of 328 single family units, a recreation center and ancillary facilities on a 48.8 acre site located in East Sacramento. All units are proposed to be single family detached units, on lots of varying sizes.

The site is elliptical in shape, and is entirely surrounded by Interstate Freeway 80 and the Union Pacific Railroad lines. Residential units are proposed as close as 58 feet from the edge of pavement of the freeway (30 feet from the freeway right of way), and as close as 8 feet from the railroad right of way.

Lands to the north consist of the closed 28th Street landfill site; to the south is the Cannery Business Park and single family development; to the east and west is also developed single family uses.

The project proposes access from two locations: the A Street bridge on the west, and the extension of 40th Street under the railroad embankment at the southeastern corner of the site.

Analysis and Findings

Based on our review of the project EIR, we find the following:

Limits of Analysis Throughout the EIR

Citation of CEQA thresholds should not be the limit of project assessment and impact analysis. Rather, the "rule of reason" is mandated by CEQA and must be applied by each technical discipline. This attempt to parse the impact analysis and mitigation is evidenced throughout the EIR, including air quality, hydrology, hazards and hazardous materials, noise and traffic, as exemplified in the following from Section 4.5:

"Impacts of the environment on a project or plan (as opposed to impacts of a project or plan on the environment) are beyond the scope of required CEQA review. "[T]he purpose of an EIR is to identify the significant effects of a project on the environment, not the significant effects of the environment on the project." (Ballona Wetlands Land Trust v. City of Los Angeles (2011) 201 Cal.App.4th 455, 473.) The impacts discussed in this section related to flooding are effects on users of the project and structures in the project of preexisting environmental hazards, as explicitly found by the court in the Ballona decision, and therefore "do not relate to environmental impacts under CEQA and cannot support an argument that the effects of the environment on the project must be analyzed in an EIR." (Id. at p. 475.)"

While a concern for the legal defensibility of the EIR is understandable, the EIR takes this posture too far and looks for legal and regulatory criteria that help avoid analysis or the consequences of the analysis, even when it is conducted, by emphasizing its inapplicability. The City's repeated reliance on the Ballona decision to avoid analyzing significant impacts that will be created by the project is inappropriate. If the proposed project will bring people and structures to an area that will impact those people and structures, the City is required to consider the impacts to those people and structures of polluted air, dam or levee failure, train derailments and freeway accidents, rail noise and intersection failure, and mitigate those impacts where necessary.

Land Use, Population and Housing

The EIR erroneously states that issues associated with Land Use, Population and Housing are not "CEQA issues" insofar as land use, population and housing have social or economic impacts, but no environmental impacts. This theory is invalid. Although it is true that CEQA does not require analysis of social or economic impacts, it is not true that CEQA considers land use, population and housing to be social or economic issues. This is evidenced by the CEQA Checklist (CEQA Guidelines Appendix G), which specifically includes issue areas related to "Land Use and Planning" and "Population and Housing." These categories are considered potential impact areas under CEQA, and must be addressed as such, including the quantification of impacts, and the inclusion of mitigation measures, if warranted.

Specifically, CEQA requires that the EIR include a discussion of the impacts and mitigation measures required to answer the following questions.

Land Use and Planning

- a) Physically divide an established community?
- b) 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?
- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Population and Housing

- 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)?
- 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?

The EIR provides only a cursory analysis of the potential impacts associated with land use, and does not analyze induced growth at all. As it relates to 'conflicting with any applicable land use plan, policy or regulation,' the EIR includes a one page evaluation of the impacts of the project on surrounding lands. There is no evaluation, however, of the impacts of surrounding lands on the project. CEQA analysis applies not only to the impacts of a project on the environment (both natural and built), but also of the natural and built environment on the project.

The land use discussion in the EIR addresses only the compatibility of the project with surrounding land use designations. It does not address the General Plan related impacts of the surrounding environment on the project. Specifically, the General Plan's Vision statement states:

"The guiding vision of the General Plan is that Sacramento will be the most livable city in America."

The Vision statement also states:

"The Vision and Guiding Principles are applicable to the context of the city as a whole as well as its community plan areas and neighborhoods."

The General Plan specifically addresses this site, as one of only four Planned Development sites in the City, and requires that the project on this site be analyzed for conformance with the General Plan, as described in Land Use Policy 10.1.4, which states:

"The City shall require areas designated Planned Development on the Land Use and Urban Form Diagram be developed consistent with the General Plan's Vision and Guiding Principles and obtain a General Plan Amendment to designate the area consistent with the proposed project using the appropriate designations contained in the Land Use and Urban Design Element."

However, the EIR provides no analysis on the surrounding development's impacts on the City's vision, guiding principles, goals or policies as they relate to the project. The EIR must address these issues, including:

1. Will the project “promote the health and well-being of the community and...the long-term safety” of its residents? (Vision Statement, page 2)
2. Will the location of medium density, single family homes within 30 feet of the BUS-80 freeway right of way provide a livable environment for residents? (Vision Statement, page 1; Guiding Principles page 3)
3. Is it ‘livable’ to look at a 13 foot high wall or a passing freight train 20 to 30 feet above you from your back yard?
4. Will traveling through an enclosed tunnel provide a safe environment for pedestrians and bicyclists? (Guiding Principles, page 3)
5. Will the proposed project provide for the “equitable distribution of affordable housing throughout the City”? (Guiding Principles, page 3)
6. How does the project “protect the pattern and character of Sacramento’s traditional neighborhoods”? (Land Use Policy 4.3.1)
7. How will an isolated, land-locked project “integrate the area with adjacent existing neighborhoods and development”? (Land Use Policy 4.5.1)
8. How will the proposed project, as a ‘new neighborhood’ be “within ½ mile of a central gathering place on a collector or minor arterial...that includes public space, shopping areas, access to transit, and community-supportive facilities and services”? (Land Use Policy 4.5.4)
9. How will the proposed project “include transit stops that connect to and support a city-wide transit system and are within a ½ mile walking distance of all dwellings”? (Land Use Policy 4.5.6)
10. Will the project meet the development guidelines for Traditional Neighborhood land use designation, including a mix of single family homes, second units, duplexes, tri-plexes, four-plexes and apartments (emphasis added); have transit and schools within walking distance; and have safe streets for pedestrians and bicyclists? (General Plan page 2-46)

None of these policy issues have been addressed in the EIR. The “Land Use, Population and Housing” section (Section 3.0), does not quantify the impacts associated with non-conformance with General Plan vision, guiding principles or policies, and does not propose mitigation measures. Given the lack of livability; lack of connection to gathering place, schools, transit, shopping or services; lack of safety for pedestrians and bicyclists through tunnels; lack of affordable housing within the project boundaries; and lack of conformance with the Traditional Neighborhood land use designation, it is clear that impacts associated with land use, population and housing are potentially significant, and that mitigation measures must be developed.

Air Quality and Climate Change

These comments and observations are made on the Draft EIR Section 4.1 discussion of "Air Quality and Climate Change". They also relate to issues of environmental and community health, and the Health Risk Assessment (HRA; EIR Appendix C) prepared for this project. While the CalEEMod model runs were reviewed, the greatest attention has been paid to the adverse health effects that are likely to result from placing more than 500 new residents, young and old alike, at this location of the city.

The subject property is literally sandwiched between a high volume BUS-80 freeway on the north and rail lines of the Union Pacific Railroad on the south. The BUS-80 freeway is already planned for expansion and higher daily volumes of cars and trucks. According to Caltrans traffic data cited in the HRA, 2012 annual average daily traffic (AADT) on the Capital City Freeway within the vicinity of the project site was approximately 159,000.

Sustainable Design Omissions

It should be noted that this project provides almost none of the nearby commercial, service and other amenities that would argue that this is a sustainably conceived project. The project provides no direct connectivity to transit and forces the use of automobiles that are loaded onto local roadways that are already at or beyond capacity. The limited health risk assessment notwithstanding, it is difficult to imagine a less safe or a more unhealthy location to live or raise a family.

The project's physical connections to the roadway network are isolated by major transportation infrastructure, including the 150-foot wide multi-lane freeway to the north and the 30-foot elevated multi-line railroad corridor to the south. Proposed "enhanced" trail access is through a 150-foot tunnel that would pose its own safety risks and in all likelihood would not be used. Neither does the project provide for bike lanes on the A Street bridge access, only further 'de-greening' the potential of this project.

To the extent that McKinley Village should be considered at this location at all, the plan should be taken back to the drawing boards and redesigned to incorporate a mixed-use land plan that reduces trips generated outside the neighborhood. The revised plan must also address the woeful lack of access, both motorized and otherwise. This should include a bus loop through the project that provides a meaningful alternative to the car. Alternatives to the Alhambra tunnel under the railroad berm and the 40th Street access tunnel are needed to provide safe pedestrian and bicycle access.

Consistency With SB 375 & Regional Sustainable Communities Strategy (SCS): There are numerous state legislative and regulatory mandates that are designed to address climate change through the application of transit-oriented development, principles of new urbanism and other concepts of mixed-use/interactive community planning. While the SACOG may recognize the proposed McKinley Village project as consistent with and promoting the goals of the SCS, there is no evidence of sustainable design in this project, the 2,000 square feet of planned "retail" notwithstanding.

The Draft EIR points out that:

“On September 23, 2010, CARB adopted the SB 375 [GHG emission] targets for the regional MPOs. The targets for SACOG are a 7% reduction in emissions per capita by 2020 and a 16% reduction by 2035.” (Draft EIR, p. 4.1-22)

Residents at this project will need to keep all windows closed year-round to ward off noise and air pollutants, resulting in higher than average energy consumption. The serious lack of access to transit and the isolation of pedestrians and bicyclists from surrounding lands and the circulation network, will only increase motor vehicle use and vehicle miles traveled, not reduce them. It is very difficult to see how this project can help the region reduce per capita GHG emissions.

Also see our comments on EIR Section 4.9 Transportation and Circulation under the heading “Bicycle, Pedestrian, and Transit Operations”.

Ballona Decision & Limitations of EIR Analysis

While a concern for the legal defensibility of the EIR is understandable, the Draft EIR continues to search for legal and regulatory criteria that help avoid analysis or the consequences of the project, even when it is conducted, by emphasizing its inapplicability. The City’s reliance on the Ballona decision to avoid analyzing and mitigating air quality impacts to future project residents is improper.

CEQA Guidelines Section 15126.2(a) states *“The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected.”* By way of example, this section of CEQA also states: *“The subdivision would have the effect of attracting people to the location and exposing them to the hazards found there.”* i.e. diesel and other fine particulates (some not analyzed in the EIR), oxides of nitrogen and VOCs, and other TAC hazards.

CARB Land Use Recommendations Ignored By Project Planners

As stated in the HRA, the CARB Handbook provides evidence that diesel particulates generated by truck traffic pose a health risk to sensitive receptors, particularly children. Studies cited in the CARB Handbook identify a health risk within 500 feet of a freeway. As stated above, these studies are based on emissions generated by traffic on major interstate commerce freeways such as the BUS-80, which currently (2012) carries about 159,000 vehicles per day, many of them trucks. The recommendations identified by CARB, including siting residential uses no closer than 500 feet from freeways or other high-traffic roadways, have been argued against in both the EIR and the HRA.

The EIR and its Appendix C take pains to point out that the CARB guidelines are only advisory and that land use decisions are a local government responsibility. While the authors of the HRA and the Draft EIR point out that other parameters, such as housing and transportation needs, economic development priorities, and other quality of life issues (CARB 2005) may also have to be considered, these potentially “mitigating considerations” are nowhere discussed in either the HRA or the Draft EIR.

Freeway Traffic Health Risk Assessment

As noted elsewhere, the entire HRA is focused on a statistical model that does not include any on-site air quality data collection. The analysis is strictly limited to a coarse-grained regional statistical model that focuses only on diesel particulate matter and its potential to cause cancer.

As pointed out in the HRA (EIR Appendix C, p. 27), *"The potential exposure through other pathways (e.g., ingestion) requires substance and site-specific data, and the specific parameters for DPM are not known for these pathways."* (CARB 1998; emphasis added) The consultants applied the SMAQMD Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways to augment CARB Handbook guidance.

The cancer risk assessment is based on the premise that an acceptable increased level of risk for future project residents is *"corresponding to a [risk that is a] 70% reduction from the highest roadway contaminant risk in Sacramento County."* (Appendix C, p. 11). Does this mean that the acceptable health risk for new residents at McKinley Village is that they will not suffer a higher risk than those known to already be most at risk in the community?

Essentially, this approach to the health risk assessment allows the bar to be a function of the worst existing background condition for diesel particulate matter. At what absolute level of DPM should future residents start to worry that their air quality is having an adverse effect on them and their children?

What are the actual (not modeled) air quality conditions on the site now? Is there a significant existing risk, statistical modeling notwithstanding?

The Roadway Protocol's evaluation criterion (threshold) is a cancer risk of 276 in 1 million; about 1 in 3,623 people. Based on the screening process performed by the consultant, the predicted cancer risk for future residents nearest to the freeway would be 200 in 1 million or about 1 in 5,000, deeming that with this finding the McKinley Village project evaluation criterion would not be exceeded. It is uncertain whether this abstraction will convey any real meaning to prospective homebuyers.

The percentage of trucks assumed in the traffic mix used in calculating SR-51 (BUS-80) is less than 3.5% and would be expected to be substantially higher given the nature of the freeway. According to CalTrans' Capital City Freeway Corridor System Management Plan (2009, currently being updated), the percentage of trucks on this portion of the freeway is 4.0%. Given the current ADT on the freeway, this represents over 1,500 trucks more per day than accounted for in the EIR. This especially important factor is made even more so by the methodology used.

The HRA states that *"It should be noted that only the truck traffic data, and not total vehicle AADT, was used to develop mobile source emission rates."* This approach implies that the emissions from the other 145,000 motor vehicles passing this site each day make no contribution to the load of local air pollutants and their adverse environmental health effects. Anyone who drives knows that it is not just diesel trucks that are significant emitters of tailpipe pollutants.

The HRA should also have evaluated future conditions along the freeway and the rail lines with freeway expansion and a continued growth in traffic, including and especially truck traffic, not conditions as they were in 2011. Projected traffic volumes for the Year 2030 and with a realistic percentage of trucks, should be included in the analysis, which should be conducted on all traffic and not just the diesel trucks and their carbon pollutants.

Railroad Emissions & Health Effects

CARB recommends avoiding siting new sensitive land uses within 1,000 feet of a major rail service and maintenance rail yard and, when within one mile of a rail yard, CARB recommends consideration of possible siting limitations and mitigation approaches. While the HRA notes that the proposed project is not within one mile of a rail yard and would not be subject to CARB's advisory recommendations, it fails to note the relatively slow speeds of trains on tracks adjoining the site and the projected number of future trains. Even halving the CARB recommendation to 500 feet would place about half of the subject property within this area of adverse impact.

Again, it must be noted that only the modeled diesel particulate matter emissions from locomotives were evaluated in this HRA; no other pollutants emitted by passing trains were analyzed in the HRA. The HRA states that the average train will pass along the subject property in 3.5 minutes and that this is not a high exposure time when compared to freeway traffic. While this is correct, the emphasis seems more appropriately placed on the 3.5 hours (assumes 60 trains at 3.5 minutes per train) of exposure that will occur with planned future additional lines and train traffic.

Comments Regarding Modeling Methodology

There are several concerns about the methodology used in conducting the Health Risk Assessment (and the associated air quality analysis). These include a lack of local data, the use of data and information that is too coarse for application to the subject analysis, and the convenience of slavishly adhering to the limits of regulations rather than assertively assessing the health risk. These are discussed categorically below.

No Local Meteorological Data: No on-site meteorological data were collected for either the air quality or HRA analyses. Rather, these analyses relied on data from the Sacramento International Airport located approximately 10 miles northwest of the subject property. On-site data are especially important given the unique conditions created by area geography and the significant source emitters (railroad and freeway).

Summer conditions are expected to most exacerbate the degradation of air quality in Sacramento and the project site. As noted in the EIR, prevailing summer climatic conditions cut off the area from maritime air mass, causing the wind pattern in this part of the basin to circle back from the north. According to the EIR, this prevalent summer condition "exacerbates the pollution levels in the area and increases the likelihood of violating federal or state standards." This same section of the Draft EIR also states that "*The mountains surrounding the valley can also contribute to elevated pollutant concentrations during periods of surface or elevated surface inversions. These inversions are most common in late summer and fall.*"

Source Characteristics: The HRA notes that train traffic data came from the EIR noise consultant; no data are cited as collected first hand or provided by the Union Pacific Railroad. For instance, in the HRA the consultant states that:

"...there are additional tracks to the east of the project site. These tracks run from the south and one leg turns westward and another leg continues to the north. Insufficient data was available in the noise assessment to distinguish the trains running on the tracks adjacent to the project site from trains running on these other tracks." (EIR Appendix C, p. 22).

The HRA goes on to say in passing, and with no substantiation, that, *"Furthermore, it appears that a limited number of trains use these tracks on a typical day."* The lack of concrete data on both existing and planned future facilities and number of trains argues that additional research be conducted in this area and the model run again.

Number of Contaminants Assessed Inadequate

Diesel particulate matter is far from the only significant, hazardous tailpipe emission from cars, trucks and trains. A wide range of other chemical compounds are emitted that directly impact air quality and public health, as well as those that contribute to the generation of photochemical smog and other harmful pollutants.

The air quality analysis and health risk assessment should also examine such pollutants as mono-nitrogen oxides NO and NO₂, which react with ammonia, moisture, and other compounds to form nitric acid vapor and related particles. Small particles can penetrate deeply into sensitive lung tissue and damage it, causing premature death in extreme cases. Inhalation of such particles may cause or worsen respiratory diseases such as emphysema and bronchitis. It may also aggravate existing heart disease. A 2005 US EPA study determined that the largest emissions of NO_x and also of volatile organic compounds came from on road motor vehicles, with the second largest contributor being mostly gasoline and diesel stations.

Non-cancer health effects are not analyzed and are mentioned in passing in the HRA (Appendix C, p. 21) and the EIR. On-site or other local air sampling, and modeling for volatile organic compounds, oxides of nitrogen and other pollutants should be required.

Inadequate Declarations of Impacts

The Draft EIR inadequately addresses certain areas of impact analysis, including the health risk the project residents will suffer from exposure to pollutants emitted by the adjoining BUS-80 freeway and the UPRR lines.

Impact 4.1-5 (p.4.1-45) The Draft EIR states that *"The proposed project would not result in substantial emissions or concentrations of PM10, PM2.5, or CO..."* This is not correct. While the project itself may not generate what is considered a significant amount of pollutants, the project site and its residents will certainly be placed within a bounded and surrounded geographic area with significant concentrations of harmful pollutants. These include oxides of nitrogen, volatile organic gases, and unaccounted for particulate matter from train and truck bulk materials hauling. The EIR attempts to obscure the impact of living at this location by simply

citing the project's operational emissions: "*the operational emissions from the proposed project would not exceed the SMAQMD significance threshold for NOx...*" The impact question is whether the project would result in the "exposure of sensitive receptors..." to significant risk. The EIR and HRA do not answer this question.

The response provided to the statement of impact is incomplete, inaccurate and defers to the next cited impact, which further limits the scope of the analysis, a pattern embedded in this EIR.

Impact 4.1-6 (p.4.1-46) The measure of significance, as described in the Draft EIR and HRA, is whether living at McKinley Village would significantly increase a resident's risk of cancer. As noted above, neither the question of impact nor the EIR adequately address the potential impacts of other sources of PM10 and PM2.5, including dust from bulk truck and train hauling, and from high concentrations of oxides of nitrogen and VOCs and other unhealthy air contaminants.

The impact discussion acknowledges CARB's recommendation that homes be placed no closer than 500 feet from a freeway with 100,000 or more vehicles per day (vpd). The subject segment of BUS-80 adjoining the site already carries an average of 159,000, more than 60% more traffic than the threshold highway volume. Nonetheless, citing the fact that the CARB recommendations are guidelines, the Draft EIR and HRA work hard to create the argument that the CARB land use recommendations do not apply to this case. This argument is not credible.

Issues of Environmental Justice

Safe air and water are two of the most essential elements that we live in and take into our bodies. Knowingly placing over 500 residents at the proposed McKinley Village site would appear to violate the equal protection provision of General Plan Policy ER 6.1.4: Protect All Residents Equally, not to mention applicable state and federal law.

If Caltrans and CARB recommendations were to be applied to this project site, no portion of it would be deemed appropriate for residential development.

Hazards and Public Safety

Landfill Related Impacts

The EIR identifies the extension and improvement of the roadway connecting the A Street Bridge to 28th Street as being over an area that may contain sub-surface solid waste, based on information from the LEA, which has regulatory authority over the landfill and its post-closure requirements. However, no investigation of the subsurface conditions has been undertaken. The EIR states that geotechnical and environmental sampling will be undertaken as part of project-related improvements, as "project measures". This represents the deferral of mitigation, which is not allowed under CEQA. In order for the EIR to properly assess the impact, the geotechnical and environmental sampling should have been completed as part of the EIR preparation process, so that impacts and potential mitigation measures could be properly and comprehensively addressed in the EIR. By deferring the analysis and mitigation to a later date, the EIR does not fully assess the project's impacts, and does not incorporate required mitigation measures.

Also associated with this issue is the possible need to make design modifications to the landfill, as stated in the EIR. Since the design of A Street from the bridge to 28th Street is known, as described in the project's documentation, that analysis and amendment should occur at the EIR level, and not be deferred to a later date. Once again, the project's potential impacts to the landfill have not been thoroughly addressed, and mitigation measures have not been incorporated into the document. The EIR should be revised to include the proper analysis, and the mitigation measures necessary to assure that impacts associated with this hazard are fully mitigated.

Dewatering Impacts

The EIR cites a potential hazard associated with dewatering the site during excavation and construction of project components below ground surface, and relies on the use of the City's Combined Sewer System (CSS) to carry dewatering flows off the site. No data is provided on the likely quantity of water that the project activities will generate. As described in our analysis of the Hydrology, Water Quality and Drainage section, however, the City's CSS is at or near capacity. The EIR must first analyze the amount of water likely to be removed from the site by dewatering activities, and then determine whether the CSS has capacity to accommodate the flows, particularly if construction were to occur during rain events which strain the system. Without this analysis, and the potential addition of mitigation measures, the proposed project's construction could result in a significant impact which has not been mitigated.

Accidents on the Railroad Tracks or BUS-80 Freeway

The EIR relies on train traffic data from the noise consultant, rather than independent data from the rail operator. It further does not consider growth in the number of trains using the lines over time, and instead assumes a static condition of up to 30 trains per day (an inconsistent assessment, when the Noise Study states that there are currently 40 trains per day on the rails). Given the continued growth in rail freight across the country, this assumption is invalid. The EIR should include estimates, based on local, regional or state-wide growth patterns, of the anticipated growth in rail trips on the adjacent rail line. This section also fails to disclose that an additional rail line is proposed north of the existing line, which will come closer to the residences, and have a potentially greater impact on resident safety.

The EIR states that derailed trains can travel 100 feet from the tracks, and that the nearest homes on the project site will occur at a distance of 90 feet from the track on the western end. Given that the momentum of a derailed car will be affected by its weight, the operating speed, the length of the train and multiple other factors, the 100 foot distance can only be considered a guide, and not a maximum potential distance. Further, the EIR considers the 90 foot distance sufficient to "minimize" the impacts of a derailment on the project site. Since the closest residences will occur closer to the tracks than a derailed train will travel, the distance does not represent "minimization," particularly since trains do not slow until they reach the east end of the project site and will therefore be operating at speeds greater than 20 miles per hour. Finally, the EIR fails to characterize the potential of airborne contamination, or of a fire's spread as a result of a derailment. Both these hazards must be addressed and mitigated.

Finally, the EIR states that it would take 122 years for trains passing the site to have a derailment, based on the national average that a derailment occurs once in every 1 million freight train miles. The analysis, and its conclusion, are invalid. First, the national average is based on

national freight train miles, not miles on a particular length of track. Therefore, all the trains operating nationally are figured into the number. That is to say that if there are 100 trains operating 100 miles every day, they will travel 10,000 freight train miles in one day. The EIR incorrectly characterizes the risk by incorrectly interpreting the data. The EIR must accurately characterize the potential for derailment, based on sound mathematical calculations.

As relates to accidents on the freeway, the EIR concludes that the distance between the freeway and the residences, coupled with the sound wall/berm, would prevent spills from entering the project site. Although this characterization is probably correct, it completely ignores the potential impacts associated with vapors or fire that could result from an accident on the freeway. As with the rail accident discussion, these impacts must be properly characterized, and mitigation measures described to lower the potential impacts to less than significant levels.

Impacts Associated with Evacuation Routes

The proposed project includes only two exit points. One of these can be blocked in the event of a flood, if the flood gates are closed. The EIR provides that the railroad tracks and the landfill site (across the freeway) are "safe havens" in the event of a flood (and presumed inability of residents to otherwise leave the site). The project site, at its widest, is approximately 1,000 feet. It is preposterous to think that residents would be expected to wade or swim such a distance to reach a "safe haven." The hazard associated with a potentially isolated population in an emergency has not been adequately addressed in the EIR, and an unmitigated significant impact remains. This must be corrected.

Hydrology, Water Quality and Drainage

The EIR identifies issues associated with hydrology and water quality. These include the possibility of a catastrophic flood event or levee failure along the nearby American River and the ability to safely evacuate the site; the potential effects of creating underpasses beneath the Union Pacific Railroad (UPRR) right-of-way (ROW), which provides secondary flood protection to lands to the south, and the manner in which existing and proposed flood gates would be operated; and the project's impacts to the sewer and storm drain system.

Combined Sewer Service (CSS) System

The EIR indicates that the City's CSS is at or very near capacity throughout the system. All additional inflows are required to provide additional mitigation to assure adequate capacity. New development and redevelopment is required to pay an impact fee to pay from the CSS.

The EIR states that, "The southwestern edge of the project site is one of several possible locations that are being considered by the City for a separate Combined Sewer Detention Project,...." It appears that City-owned lands are included in the project development plan and confuse the use of lands surrounding the 28th Street access drive. Lands around the access appear to be planned for stormwater retention but it is uncertain what portion of this area would retain project on-site runoff or that from adjoining lands. The EIR does not address a number of important questions:

- Is this prospective City facility provided for in the proposed development plan?

- Is the viability of the on-site stormwater detention system dependent on the retention facilities shown on the tentative tract map, and if so has the City explicitly granted the right of the developer to use these City-owned lands?
- The EIR should provide a detailed description of the City sewer facility and should provide a discussion of its compatibility with the proposed project.
- The EIR discussion does not provide a clear description of the combined sanitary/storm sewer system that will serve the project. How are storm and sanitary flows isolated? Is the referenced 6,500-gallon sewage detention tank for sewage or stormwater?

Impact Analysis and Mitigation

The EIR states that impacts discussed are limited to those raised by the public. The City and public should also be able to rely upon the unbiased, professional knowledge and experience of the technical consultants who helped to prepare this EIR to ensure that all relevant potential hazards and impacts are raised and addressed. The EIR consultant should not rely on, or limit analysis to, those issues raised by the public.

Cited Significance Thresholds Inadequate

The thresholds of significance set forth on page 4.5-30 of the EIR do not include all of those set forth in Appendix G of the CEQA Guidelines and, therefore, the EIR's claim that the thresholds are consistent with Appendix G are incorrect. While the EIR argues that 100-year floodplain issues do not apply to this project, the cited thresholds do not include that cited in Section IX.i) of Appendix G, which requires analysis associated with impacts from the failure of a dam or levee. This section of the EIR should be revised and these additional thresholds included and analyzed.

Levee Failure Analysis

While the City and applicant have no control over the levee certification process conducted by the US Army Corps of Engineers on the American River levees, the City does have a responsibility to independently consider the adequacy of this determination. The EIR does not provide a high level of assurance that American River containment levees in proximity to the subject property are in fact certified and it is not clear that they are or should be. The EIR cites numerous failures in levee maintenance and steady increases in estimated flood volumes for the river.

For these and other reasons, the certification of the American River levees and the veracity of the current mapping of the FEMA 100-year flood plain are clearly in question (see Section 4.5, page 9 of the EIR). The EIR admits to the steady reduction in estimated efficacy (storage or containment capacity) of existing flood control facilities, including river levees and Folsom Dam. While dam improvements are under way, it is unclear what actions are being taken in the project vicinity to ensure that the levees will in fact contain a 100-year storm. This disparity between Army Corps levee management and FEMA mapping is at best inaccurate and needs to be clarified in a revised draft of the EIR.

Further increasing the threat of unprecedented flood on the American and other rivers is how climate change is affecting the location and intensity of precipitation. Intensifying weather patterns, including the generation of progressively stronger storms, may well generate storm

flows that exceed calculated 100-year flood volumes. Prudent and sustainable development must take into account the significant potential for an increase in flood volume and frequency on the American River. Therefore, the City should apply Standard Project Flood (SPF) volumes and a minimum of 1-foot of freeboard to levees along the American River as a prudent threshold for this and other projects so vulnerable to flooding from the river.

UPRR Underpass Flood Gates

The EIR indicates that the proposed 40th Street underpass, which provides one of two primary access points to the site, will be fitted with flood control gates, which will be closed in the event of a levee breach along the river. While this strategy will help protect properties on the south side of the elevated UPRR embankment, it will only further ensure total flooding of the McKinley Village site. Assuming that damage is limited to inundation by the American River, the result could be the impounding of waters to a depth of 18 to 22 feet on the project site. Since the closure of the flood gates would also eliminate one of only two access points on the property, evacuation of the site would be significantly impacted. Clearly, this would be devastating both in terms of loss of property and lives. Yet the EIR provides no analysis of this impact or mitigation, and does not consider this to be a significant unavoidable impact, based on the previously discussed Ballona decision. It is contrary to sound public policy principles for the City to ignore this potential impact on the basis that impacts of the surrounding environment on the project are not to be addressed.

On-Site Pump/Force Main System

The EIR provides two different descriptions of the planned on-site stormwater collection/management/discharge system. Specifically, Figure 4.5-4 shows the on-site force main pumping east through the site to the access road, which is the northerly extension of 40th Street, the force main passing under the rail lines at the proposed 40th Street underpass and connecting to the City's Sump 99 located southeast of the site. From here, the pumped discharge would be pumped directly to and discharged into the American River.

However, on page 4.5-40 of the EIR states that, "The pump station would be located at the west side of the project site and pump flows south under the UPRR embankment south to Alhambra Boulevard at the intersection of McKinley Boulevard. This contradicts the description in other parts of the hydrology discussion. The revised EIR must clear up this contradiction and inconsistency.

Impacts to Water Quality and Supply

While the EIR speaks to the issues of water quality and on-site groundwater conditions, it does not speak to the long-term viability of the hydrologic basin in which it is located. The discussion regarding potential project impacts to local groundwater is presented in a confusing and contradictory manner. For instance, the EIR states:

"Although it may interfere slightly with groundwater recharge due to an increase in impervious surfaces, the project site is not in a favorable groundwater recharge area due to the relatively shallow depth of groundwater and the hydrologic connection of the groundwater system with the adjacent American River." (p. 4.5-17; emphasis added)

In the same paragraph it goes on to state:

"Furthermore, the project applicant has committed to implement runoff reduction LID measures, which are designed to promote groundwater infiltration."

First, it is unclear whether there is a concern that the quality of project runoff could contaminate the local groundwater. Then the EIR states that on-site percolation into the underlying aquifer will be encouraged to reduce flows to the community storm sewer system. This inconsistency and contradictory management strategy needs to be corrected in a revised draft of the EIR.

With regard to water supply, Section 4.8 - Public Utilities of the EIR provides data and information on surface and groundwater resources supplying the needs of the City. These include diversions from the Sacramento and American Rivers, which totaled 279,800 acre-feet in 2012 according to the EIR. However, nowhere in the EIR is there a discussion of "safe yield" either for the rivers or groundwater. The hydrology discussion simply states,

"In addition, the project does not propose the use of on-site groundwater wells; therefore, it would not substantially deplete groundwater supplies."

Clearly, this is an inadequate response to a CEQA threshold. At the very least, the EIR hydrology section should reference the Section 4.8 discussion on water supply. Our comments on the water supply discussion can be found below under the Public Utilities discussion.

Noise and Vibration

The following first addresses our review of the Noise Study (and its relationship to the EIR), and then describes the EIR discussion.

Noise Study Analysis

Freeway Noise

The EIR noise study (Appendix I) states that:

"The ambient noise survey results indicate that the measured noise levels at the project site are elevated well above City of Sacramento noise level standards, as would be expected of areas immediately adjacent to Business Route 80 and the UPRR tracks."¹

The project site is completely encircled by high volume/intensity transportation corridors. For instance, the entire north boundary, which comprises one-half of all project boundary, abuts the Business 80 freeway and is exposed to a constant (Ldn) noise level of 81 dBA. What the EIR and noise study do not make clear is that the intrusive, maximum noise levels from BUS- 80 traffic range from more than 80 dB to more than 100 dB (Lmax). Traffic noise from BUS-80 is currently having a significant adverse impact on the subject property.

¹ "Environmental Noise Assessment – McKinley Village Project", prepared by Bollard Acoustical Consultants, Inc. October 22, 2013.

Railroad Noise

Railroad operations noise also impacts the site on its south half. Train noise is associated with running, stopping and starting, reversing direction and braking. Warning horns are also an intrusive source of train noise and can be as loud as 110 dB. Currently, there are approximately 40 passenger and freight trains passing the site each day. It should be noted that the 28th Street at-grade crossing, which is about ¼ mile west of the site, has been designated a "Quiet Zone" and train horn use in this area should therefore be substantially reduced.

Data collected by the noise consultant indicates that noise levels as measured at 90-feet from the nearest track reached 100 dBA, with an Lmax of 90 dBA and an Ldn of 70 dBA. The planned addition of another rail line closer to the subject property and the anticipated increase in train traffic will bring rail lines to within 45-feet of homes and increase the Ldn noise level to 72 dBA. It should be noted that the combined railroad/BUS-80 traffic raises the Ldn noise levels in the southeastern portion of the site to 74 dBA (see Appendix I, Table 5). General Plan guidelines issued by the State, and long-standing practice in the field puts acceptable outdoor noise levels for sensitive receptors at 60 to 65 dBA. The existing environment at the project site is therefore inconsistent with State standards for residential noise levels. This is further supported by the fact that the UPRR has requested that future buyers sign environmental constraints sheet or declaration acknowledging that they are aware of existing and future railroad-related noise. Clearly, the railroad has identified a potential impact, which the EIR fails to fully analyze.

CEQA Noise Thresholds of Significance

The CEQA Guidelines (Appendix G) set forth specific thresholds to determine whether noise impacts to or resulting from a proposed project could have a significant adverse impact. Most relevant CEQA thresholds include the following, which are not cited either in the EIR or the EIR Appendix I noise report:

- a) Exposure of persons to or generation of noise 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 ground-borne vibration or ground-borne noise levels?
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

CEQA defines a threshold of significance as follows:

"A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant." (CEQA Guidelines Section 15064.7)

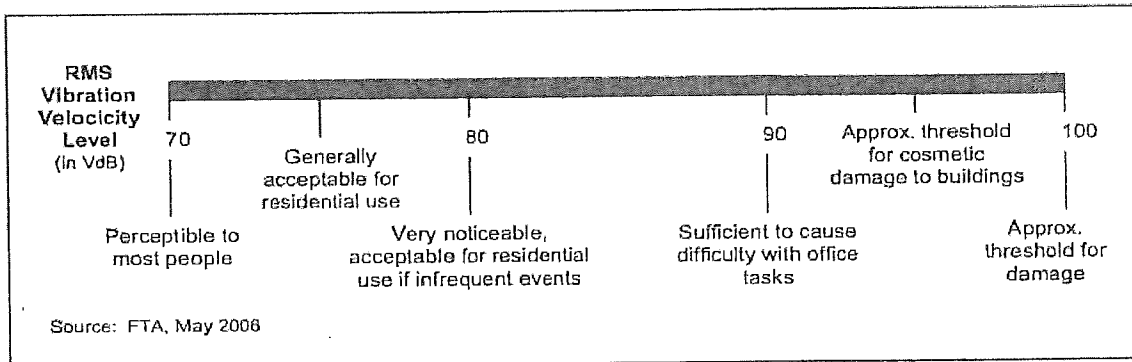
Also applicable to this analysis is CEQA Guidelines Section 15065, Mandatory Findings of Significance, which directly reference:

“The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.”

Noise Study Thresholds Are Substandard and Unsubstantiated

The EIR Noise Study (Appendix I) cited the following as “standards” (thresholds) of significance by which the noise impacts associated with the proposed project are to be judged.

- result in a substantial permanent increase in ambient exterior noise levels in the project vicinity that exceed standards in the City’s General Plan (60 dBA standard for low density single family residential);
- result in residential interior noise levels of 45 dBA Ldn or greater caused by noise level increases due to project operation;
- result in construction noise levels that exceed the standards in the City of Sacramento Noise Ordinance;
- permit existing and/or planned residential and commercial areas to be exposed to vibration-peak-particle velocities greater than 0.5 inches per second due to project construction;
- permit adjacent residential and commercial areas to be exposed to vibration peak particle velocities greater than 0.5 inches per second due to highway traffic and rail operations; or
- permit historic buildings and archaeological sites to be exposed to vibration-peak-particle velocities greater than 0.2 inches per second due to project construction, highway traffic, and rail operations.



Train Traffic Data Needs to be Revised and Better Sourced

The acoustical engineers used their own data to establish a daily train count, which appears to substantially undercount train traffic (see Table 7 of Appendix I) by as much as 37%. This source of data is consistently referenced throughout the EIR, when the source should have been UPRR and other dependable sources.

Noise Monitoring Equipment Locations

The Draft EIR states that the noise monitoring was conducted “along this roadway facility (BUS-80). Where precisely were these monitors and those placed along the UPRR tracks?

Railroad Vibration Impact Assessment

The EIR noise study provides abstract information on the rate of ground acceleration (inches per second) caused by trains passing nearby but does not adequately or correctly equate the rate of ground acceleration with effects on future residents.

Railroad Single Event Noise Impacts

The EIR noise report’s analysis of railroad-related single event noise impacts is inadequate and needs to be more carefully conducted. The author admits that the modeling of train noise at and around the proposed auto-court homes is difficult and complex. The results therefore should probably be considered tentative. In part, the report states:

“As noted in Table 2, studies of sleep disturbance have indicated that an interior Sound Exposure Level (SEL) of 65 dBA resulted in an average percentage of awakening of approximately 2% of the population. Because 2% of the population can be expected to regularly awaken due to a variety of factors not related to noise, the use of an interior SEL threshold of 65 dBA for the assessment of single-event impacts within residences is both reasonable and scientifically defensible.” (EIR Appendix I, p. 26)

The ground-borne vibration associated with passing trains should also be considered an intrusive, single event, albeit one that will occur about 40 to 70 times a day (including at night).

The EIR noise report states that:

“The City of Sacramento has indicated that an appropriate vibration threshold to be applied to highway traffic and railroad operations is 0.5 inches/second peak particle velocity for proposed new residential uses and 0.2 inches/second for historic structures and archaeological sites.” (Emphasis added; EIR Appendix I, p. 26)

What form does this City “indication” take? Is it an adopted threshold? Is this an ad hoc standard adopted by staff? Where is the standard codified and what is the technical basis for it? The above attempts to set a standard that tends to serve the proposed development but may harm future buyers.

Research has shown that human perception levels for vibration are as follows:

- Vibration level less than 0.5mm/s – imperceptible (threshold of perception)
- Vibration level of 0.5mm/s to 2.0mm/s – slightly perceptible (barely noticeable)
- Vibration level greater than 2.0mm/s – distinctly perceptible (noticeable).

Vibration levels in excess of 5.0mm/s have the potential to compromise amenity values. Other sources cite a range of 0.02 to 0.05 inches/sec as a level at which vibrations begin to annoy occupants of buildings. The UPRR has already requested that future buyers sign environmental

constraints sheet or declaration acknowledging that they are aware of existing and future railroad-related noise. Clearly, the railroad has identified a potential impact, which the EIR fails to fully analyze.

Assessment of Railroad Noise Impact Analysis

The following briefly summarizes the assessment of impacts set forth in the EIR and compares these conclusions to data and information provided in the EIR and the EIR noise study (Appendix I).

Railroad Ground-borne Vibration Impacts

The proposed project would be impacted by significant ground vibration ranging up to at least 0.08 inches per second, generating both ground motion and building vibrations which are well within the range of human annoyance and disturbance. Table 4 of the EIR noise study (Appendix I) cites a single Caltrans survey document as a source for human and structural response to vibration levels. This reference is grossly inadequate, and there is a broad literature on the physical, physiological and psychological responses of humans to vibrations, which should also be reviewed and cited. According to ISO 2631-1:1997, the magnitude ground-borne vibration already occurring adjacent to the UPRR lines is within the “very uncomfortable” range².

Railroad Acoustical Impacts

The second noise source associated with railroad operations is acoustical, that is sound energy conducted through air (noise). As noted earlier in our comments, railroad operations noise impacts the site on its south half. Train noise is associated with running, stopping and starting, reversing direction and braking. Warning horns are also an intrusive source of train noise and can be as loud as 110 dB. It is also important to keep in mind the following from the EIR noise study:

“In addition to the potential for increased freight rail service in the future, an expansion of the Capitol Corridor service has been proposed which could potentially affect the project site noise environment. The expansion would increase existing Capitol Corridor service from two (2) daily operations to twenty (20) daily operations adjacent to the project site. When added to the existing passenger service adjacent to the project site (California Zephyr and San Joaquin lines), a total of 26 daily passenger trains would pass the project site daily. This expansion would require the construction of a new track up to approximately 45 feet closer to the project site.” (Emphasis added)

Noise Study Impact 1 & 2 (Appendix I, p. 28 & 34): The noise study mis-states the level of impact from train noise, failing to apply the likely future condition with the addition of another rail line that will bring the nearest rail line to about 45-feet from the nearest residence. The development plan calls for homes built only 14-feet from the UPRR right-of-way. This places homes just 59-feet from trains, which will tower over these two story residences, upon completion of the anticipated railroad line expansion.

² ISO 2631-1:1997. Identifies R.M.S. acceleration in millimeters per sec². Translation of 0.08 inches per second to millimeters yields an acceleration of more than 2mm per sec². Also see Guski *et al.*, 1999.

The analysis graphics are not to scale and do not show the actual line of sight between noise sources and receptors. Neither does it demonstrate the efficacy of the recommended 16-foot barrier created by an outdoor room and 10-foot high wall in the gap between residences backing onto the tracks. With railroad lines being up to 30-feet above the finished grade of the adjoining homes, the angle of unobstructed radiation of noise will still be significant, and will be especially impactful for the next row of units in the auto-court, with their outdoor rooms oriented toward the tracks. The noise report modeling is complicated, as acknowledged by the authors, but the line-of-sight exposure and the existing high train noise are clear indicators of significant adverse impacts if homes are built at this location.

Finally, the noise study concludes that the *“residential structures are predicted to provide approximately 15 dB of noise reduction in the nearest private yard areas, maximum noise levels during railroad passages would be reduced to approximately 74 dB Lmax in the yard areas....”* (EIR Appendix I, p. 29). It should be noted that this Lmax impact is calculated for the most sheltered part of the auto-court with the best line-of-sight intercept of train noise. Homes on the north side of these auto-courts will have an unobstructed (unmitigated, except by distance) exposure to this significant impact. No data is provided to quantify the impacts to these homes.

The unobstructed (unmitigated) noise levels from individual intrusive noise events were measured to range from 80 dBA to more than 100 dBA (see EIR Appendix I, appendices A-4, A-5 and A-6). The EIR noise report appears to be inconsistent in differentiating between Lmax and SEL measurements. The subject peak train-related noise events are shown as Lmax. Therefore, the conclusion that development of these homes at this and other locations within the subject property *“would not interfere with typical outdoor recreation activities and which may not even briefly interfere with outdoor communication...”* (EIR Appendix I, p. 29) is unfounded and actually understates the likely actual train-related noise impacts to residents who will live in the entire project but especially in the vicinity of the rail lines. With so many hard surfaces reflecting train and other noise, effective shielding does not seem credible.

We believe that the analysis is incomplete and not reliable as a predictive tool. Until additional analysis and documentation can be provided, the existing and future railroad noise is expected to have a significant adverse impact and will result in unacceptable outdoor and indoor noise conditions.

Noise Study Impact 4 & 7 (EIR Appendix I, p. 34 & 37): This impact discussion provides an abstract description of impacts, levels of mitigation needed to reduce impacts to acceptable levels, and interpretations of policies that rationalize higher levels of acceptable impacts. The unobstructed (unmitigated) noise levels from individual intrusive noise events were measured to range from 80 dBA to more than 100 dBA (see EIR Appendix I, appendices A-4, A-5 and A-6).

The EIR noise report argues that a 65-dB SEL is an acceptable threshold for interior noise during the passage of a train. It should be kept in mind that there will be up to 70 such events each day in the future. This unusually high threshold is only reachable with windows tightly closed. Even with numerous recommended mitigation measures, the EIR noise consultant still recommends that buyers sign and record a disclosure statement acknowledging that they have been informed

on this environmental impact. Acknowledgement of a significant impact by a resident is not mitigation under CEQA.

Noise Study Impact 5 (EIR Appendix I, p. 36): The EIR noise report discussion skips over the substantial and significant adverse train-related noise impacts to other auto-court homes along the tracks. If the auto-court homes are considered noise attenuation devices for the rest of the project, then they do serve to help reduce impacts for those residents living farther from the tracks. As noted in the report, even deeper into the development, outdoor noise levels from passing trains would be significant;

"In terms of single-event noise and the potential for sleep disturbance, SEL values at the exterior facades of these residences are predicted to be approximately 84 dB SEL during train passages." (EIR Appendix I, p. 36)

Just as an airport approach is not an appropriate location for residences, so too is this heavily used rail corridor an inappropriate neighbor for new residential development.

Noise Study Impact 6 (EIR Appendix I, p. 37): As noted earlier in our comments, data collected by the noise consultant indicates that noise levels as measured at 90-feet from the nearest track reached 100 dBA, with an Lmax of 90 dBA and an Ldn of 70 dBA. The planned addition of another rail line closer to the subject property and the anticipated increase in train traffic will bring rail lines 45-feet closer to homes and increase the Ldn noise level to 72 dBA. It should be noted that the combined railroad/BUD-80 traffic raises the Ldn noise levels in the southeastern portion of the site to 74 dBA (see Appendix I, Table 5).

Assessment of Vehicular Traffic Noise Impact Analysis

As noted earlier in our comments, the entire north boundary of the project, which comprises one-half of all project boundary, abuts the Business 80 freeway and is exposed to a constant (Ldn) noise level of 81 dBA. Projected future traffic volumes are calculated to result in a future Ldn of 82 dB. What the EIR and noise study do not make clear is that the intrusive, maximum noise levels from BUS-80 traffic range to more than 100 dB (Lmax). Traffic noise from BUS-80 is currently having a significant adverse impact on the subject property.

Noise Study Impact 9 (EIR Appendix I, p. 39): Ldn values for BUS-80 traffic may not accurately represent noise levels at the subject property boundary. While the convention is to model from the roadway center line, the BUS-80 is a wide freeway with an equally wide median island, which artificially places the noise generators (vehicles) farther away from the site than they will actually occur. The paved section of BUS-80 appears to occur within 50-feet of the subject property. The analysis needs to be recomputed using the actual distance and final grade elevations for the BUS-80 travel lanes and the proposed homes.

The proposed noise mitigation along BUS-80 is also equally forced and will result in an undesirable design and condition. The application of a 12-foot block wall atop a 4-foot berm will create a canyon effect that will not enhance the quality of life in this part of the proposed development, and its efficacy is questionable.

EIR Analysis

The following comments and observations have been made on the Draft EIR noise discussion following our review of the noise report (EIR Appendix I). A review of both documents shows that the Draft EIR simply cuts and pastes large segments of the noise study without any apparent review or assessment. In this regard, the Draft EIR repeats the same errors identified in the noise report. Our comments should be considered in the context of and in conjunction with those made on the EIR noise report, above.

Off-Site Traffic Noise Discussion & Table 4.6-5: The off-site traffic noise discussions should be substantially expanded and real data and information provided to the reader. The current discussion is inadequate. This important table reproduces Table 6 of Appendix I, excepting that the most important noise contour data is deleted in the Draft EIR. These data describe the baseline noise contours generated by traffic on the BUS-80 freeway. In addition to railroad noise, BUS-80 traffic constitutes the most significant source of noise impacting the subject property. These data need to be added to this table and the Draft EIR should be re-circulated.

Figures 4.6-2 and 4.6-3 ESRI Data Inconsistent With Measured Data: The EIR noise report provides a variety of data on existing and projected future noise levels along both the rail lines and BUS-80. However, the Draft EIR includes two exhibits based on grossly more general and inadequate and inconsistent ESRI data. These figures should be removed as they misrepresent existing site conditions and should be replaced with figures based on the EIR Appendix I noise study.

Policy EC 3.1.1 and Table 4.6-9 Discussion Needs Clarification: It appears that the cited General Plan policy is meant to provide an out for projects that are proposed in locations where community noise standards cannot be met even with application of BAC methods. The project cannot achieve the City's 60 dBA Ldn exterior noise level along the railroad lines nor along the freeway. Does the application of an 8 or 12 dB Ldn noise increase mean that the City can declare 57 dB Ldn nighttime exterior noise levels to be acceptable? This discussion needs further elaboration and clarification.

Policy EC 3.1.11 Alternatives to Sound Walls: This policy states that the City will discourage the use of noise walls for noise mitigation and that in their place the City supports the use of innovative design strategies and other noise reduction methods that also enhance community aesthetics. The proposed mitigation for railroad and BUS-80 noise impacts are exactly what City General Plan policy is trying to avoid. The noise consultant and project designers should explore and evaluate other methods of noise mitigation that do not result in such significant adverse aesthetic impacts and poor community design.

Declaration of Noise Ordinance Exemption Inappropriate: The EIR noise discussion (p. 4.6-25) states that although the City has adopted noise standards for exterior residential space, these standards do not apply to such noise sources as traffic and trains. The stated logic is that the City has no control over these sources. In fact, this is a complete misinterpretation of the City's regulatory responsibility, which is to include the protection of the public from being enticed to live or work in an environmentally hazardous environment.

The standards set forth in Table 4.6-11 of the Draft EIR are applicable to the exposure of the proposed project to intrusive traffic and train noise. CEQA specifically states:

“Would the project result in exposure of persons to....noise levels in excess of standards established in the location general plan or noise ordinance...”

The City may not knowingly allow development that will place residents in a dangerous or harmful noise environment. Therefore, the City Noise Ordinance and its standards must be fully applied to this project.

Ballona Decision & Other Declared Exemptions: As is the case throughout the Draft EIR, the authors go to great length to argue the case for the inapplicability of existing environmental conditions in the subject impact analysis.

The City’s reliance on the Ballona decision to avoid analyzing and mitigating noise impacts to future project residents is improper. The CEQA Guidelines expressly require an analysis of whether a project will expose people to excessive noise or excessive ground borne vibrations (CEQA Guidelines Appendix G. XII. Noise). Therefore, the EIR must analyze the effects of these existing environmental conditions on the proposed development and its future residents, and provide mitigation consistent with all other projects, not with special exemption.

Ineffectiveness of Proposed Mitigation

The subdivision is proposed at a location that is significantly impacted by freeway and railroad noise, which is only expected to increase with expanded freeway and rail facilities, and increased traffic volumes. The extent to which unpalatable design measures must be applied to shoehorn the project into compliance is a clear indication of the inappropriateness of this project at this location. Even with the application of unattractive design measures that will adversely affect the quality of life in the McKinley Village subdivision, the project must exempt itself from standard thresholds to be found acceptable.

Public Services and Recreation

Police Services

The EIR (page 4.7-2) states that the police department is currently operating at service ratios well below its goal of 2.5 sworn officers per 1,000 population. In the impact analysis, however, the EIR incorrectly calculates demand for police services on the basis of 2 sworn officers per 1,000, thereby underestimating project demand. The project will create a need for two sworn officers, not one. Further, although the EIR states that revenues and taxes from the project will be sufficient to fund the one officer, there is no evidence to support the statement. Given that the City currently operates at staffing ratios of 1.34 officers per 1,000, the current revenues and taxes are not sufficient to provide adequate police services. The EIR’s conclusion is therefore not supported by fact.

The EIR only addresses impacts to the City’s Police Department, “because it is highly unlikely the CHP....would be called upon to provide services to the site.” This assumption cannot be supported, given the project’s location immediately adjacent to BUS-80, and the potential for

mutual aid calls because of the project's location. The EIR must include an analysis of the potential impacts of accidents at the site, particularly with the construction of walls, berms and other project components.

Finally, the cumulative impact discussion relating to police protection is inadequate. The police department is currently operating well below its standard of 2.5 sworn officers per 1,000. The proposed project will add a need for 2 additional police officers, which will in no way address the existing deficiency. The EIR must consider that the current impacts to police services is significant, and that the addition of the proposed project will add to this significant impact. This should lead to a determination of whether mitigation measures are possible, or whether a significant unavoidable cumulative impact results from implementation of the project.

Schools

The analysis of school capacity has been undertaken in a vacuum. The remaining capacity at local schools, whether in TRUSD or SCUSD, assumes no annual growth other than the addition of project residents. Given that the project will require several years to construct, the actual capacity of individual schools is likely to be considerably less than that shown in the EIR. With the addition of annual growth, for example, it is certain that Woodlake Elementary, Union High School and Theodore Judah Elementary would all be at capacity and could not accommodate project students. As a result of this miscalculation, the EIR does not address the likely impact to schools. There is no evidence in the EIR that any of the existing schools plan expansions, or that additional schools are proposed. This represents a potentially significant impact that has not been mitigated in the EIR. Further, because the impact to schools is directly tied to cumulative growth, the cumulative impact discussion relating to schools is inadequate. With the addition of an annual growth rate, schools in the immediate vicinity of the proposed project will operate beyond capacity, with or without the proposed project. Without evidence that school expansion or construction is likely, this will represent a significant cumulative impact that remains unmitigated.

Transportation and Circulation

The following describes our concerns regarding the traffic analysis in the EIR. There being no traffic study provided, as described below, we cannot base our analysis on comprehensive data. Please also see the January 8, 2014 letter from Hexagon Transportation Consultants.

Traffic Analysis Documentation Inadequate

The EIR and appendices lack a true traffic report; only the raw output from the model are provided. For example, there is no discussion of ambient growth rates used to estimate future traffic. Neither is there a discussion, much less analysis, of modal-split. For a project that has been found consistent with the local SCS, there should certainly be an effort to model the potential for use of alternative modes of travel. A complete traffic impact analysis should be provided with the EIR. Otherwise it is not possible for even the initiated to decipher the raw model output.

State Fair Grounds/Cal Expo/Future Regional Park

There is no mention of special events in the area and their effects on roadway segments and intersections studied in the EIR. The California State Fair Grounds (Cal Expo) is located a short

distance from the subject property and will have a significant impact on area-wide traffic and congestion during the fair and other fairground events. From November 2013 through February of 2014, there are six major events booked at Cal Expo that occupy this site almost continuously over this period. Future uses and special events at Sutter's Landing Regional Park could also cause BUS-80 access ramps to fail and make the area inaccessible during peak hour periods. The effects of events at Cal Expo and the regional park on area traffic and congestion should have been analyzed in the project EIR and traffic report.

Freeway Ramp Operations - Existing Conditions

Section 4.9 (p. 4.9-28) of the EIR states:

"Observed LOS is worse than reported. The analysis methodology does not fully capture traffic operations effects in congested locations with bottlenecks."

Table 4.9-6 indicates that most of the freeway ramp peak hour operations are at Level of Service (LOS) D. According to the EIR, the actual level of service is worse:

"As a result of these bottlenecks, actual peak hour conditions on the Capital City Freeway within the study area are LOS F during peak periods."

The EIR indicates that about 17% of in-bound and 17% of outbound project traffic will take ramp access onto and off of BUS-80. What are the long-term consequences for ramp operations in light of today's actual LOS F operations?

Freeway Ramp Impact Analysis & Mitigation Required

The EIR goes to great length to avoid the applicability of freeway impact analysis, applying the provisions of Public Resources Code Section 21159.28. Related to this posture, the EIR states that:

"Therefore, the roadway capacity utilization results contained in this section are for information purposes only, and not utilized for impact analysis."

What the author appears to have overlooked is subsection (c) of Section 21159.28 of the CEQA Statutes, which also states:

"Nothing in the foregoing relieves any project from a requirement to comply with any conditions, exactions, or fees for the mitigation of the project's impacts on the structure, safety, or operations of the regional transportation network or local streets and roads."
(Emphasis added).

Therefore, arguments to the contrary notwithstanding, the subject EIR is required to analyze these impacts and to mitigate them. Because of the lack of analysis and mitigation, the EIR is inadequate.

On-Site Project Retail

Section 02 of the EIR states that the project "recreation center may include up to 2,000 sf of retail space that could be used for a café, restaurant, shop or other retail use that would be open to the public." Would access to a restaurant in the project community center be available to the non-resident public living outside of the project? If so, what percentage of the "retail" trips would originate from outside the project? No description of these additional trips is provided in the EIR, and it is therefore impossible to gauge the potential impact to the street system, both internally or externally.

Inadequate and Potentially Dangerous Site Access

The McKinley Village site is one of the most physically isolated in this area of the city, being cut off from the surrounding roadway network by BUS-80 and the Union Pacific railroad lines.

Proposed Rail Underpass

Development of this site will necessitate the construction of a rail underpass (motor vehicle tunnel) at the north end of a realigned 40th Street. It will be especially susceptible to closure due to flooding, rail operations or accidents. This tunnel/sub-grade access road will be approximately 150-feet long and will intersect with "C" Street mid-block between Tivoli Way and 40th Street, creating a dangerous off-set intersection. This should be avoided by aligning the project access with either 40th Street or Tivoli Way.

"A" Street Access

The only other vehicular access will be the extension of "A" Street into the site, utilizing the existing bridge at this location. The EIR project description does not discuss the condition of the current "A" Street bridge, which appears to be substandard in at least the width of the bridge deck. There is no discussion in the transportation section of the EIR that addresses needed improvements to this critical facility other than to recommend "that the bridge cross-section allow for safe and convenient pedestrian travel", and that it provide sidewalks on both sides and two travel lanes. However, the EIR is inconsistent and unclear. Page 4.4-41 of the EIR describes the bridge as including bike lanes; will these in fact be provided?

The EIR should be revised to provide a useful description of this bridge and how it needs to be modified to meet project and City goals, including the provision of bicycle lanes.

Whether the project is SCS-compliant or not, there is no provision for bicycle lanes or other multi-modal facilities on this bridge. In light of the critical nature of this single facility, this discussion and "analysis" is significantly inadequate and needs to be expanded to provide an adequate bridge description and design that also includes bike lanes.

"A" Street Access and the Sutter's Landing Parkway Interchange

The proposed development plan does not appear to make provision for a new freeway interchange at the location of the existing "A" Street bridge. The EIR states,

"A roadway extending east from the intersection of 28th Street and A Street through the Landfill site and over the Capital City Freeway is currently contemplated in the City's

2030 General Plan as part of the Sutter's Landing Parkway Interchange, and in the Sutter's Landing Park Master Plan." (p.4.4-41)

The proposed development plan appears to make no provision for, and could actually preclude the construction of the planned "A" Street/Freeway interchange. The current discussion provides almost no information on the planned interchange or how the plan accommodates it. As a reasonably anticipated future project, the potential traffic (and other) impacts of this interchange on the proposed development needs to be analyzed in this EIR.

28th Street At-Grade Railroad Crossing

The project NOP indicates that the existing Union Pacific Railroad lines carry an average of 43 trains per day. The EIR indicates that during the AM and PM peak hours both passenger and freight trains will cross 28th Street. Train delays seem quite short compared to the time required for a long freight train to pass through a developed area such as this one. Could delays be substantially longer? The EIR should calculate traffic delays based on the actual current length of trains, and current wait times at existing at-grade crossings.

Page 4.9-88 states that the project would generate a net increase of about 1,400 daily trips to the at-grade railroad crossing. Alternatively, the EIR cites these volumes at 1,100 daily trips on 28th Street south of "C" Street but the allocation of project traffic as shown on EIR figures 4.9-7 and -8 identify about 1,467 daily vehicles on this road, a more than 33% increase over forecast EIR volumes on this segment. These inconsistencies must be addressed.

EIR figures 4.9-7 and -8 indicate that 52% of project in-bound and out-bound trips will access the site via A Street, with project traffic projected to total 3,507 daily trips. Based upon trip distribution and assignments in the EIR, it appears that the project will generate approximately 1,824 daily trips at the at-grade rail crossing, or 30% more than that cited in the EIR. What do these corrected volumes mean for capacity, safety and delays at this crossing?

This at-grading crossing, especially in light of only one other vehicular access to the development site and the lack of alternative access on 28th Street north of the rail lines only further decreases the viability or desirability to rely on the A Street access which is necessarily tied to rail traffic crossing 28th Street.

While the EIR speaks to the superior controls at the 28th Street/UPRR crossing, even a cursory review of existing control mechanisms shows that impatient or otherwise careless drivers can easily drive around the crossing arms and cross the rails while the controls are in operation. Given the volume of AM and PM peak traffic and the frequency and length of trains, the EIR does not accurately characterize the hazards associated with this crossing, and further quantitative and qualitative analysis should be performed.

Hazardous Isolation

Finally, the surrounding intensive transportation facilities that bound the subject property on every side are a significant potential source for vehicular and/or rail accidents, including the loss of containment of flammable, or otherwise hazardous or toxic materials. Both direct and indirect significant impacts associated with the adjoining transportation operations are more likely at this

location than a location that is not adjacent to heavily used transportation facilities. Also see our concerns regarding restricted access, constraints on effective emergency response, and increased potential exposure to hazardous/toxic materials, above.

Trip Distribution and Assignment

As opposed to a gravity model, which would have provided a concrete, logical connection between the proposed land use and surrounding land use, and trip distribution and assignment, the EIR appears to defer to the SACMET regional travel demand model. In proximity to the project site, the EIR recognizes several constraints to safe and efficient access, including the large number of one-way streets, the location of freeway on- and off-ramps, and the presence of traffic diverters (i.e., half street closures) within the study area.

In light of the extremely limited access options, it is also not surprising that accommodating project traffic requires that it be channeled to two or three routes, including routes through well-established single family neighborhoods such as that along 28th Street north of "E" Street, and 30th Street. Along some roadway segments, the EIR indicates the need for varying lane closures to have sufficient capacity to accommodate project traffic. The use of AM and PM peak hour lane closures, and in alternating directions, is an awkward and questionable method of capacity management. While on a strictly volume to capacity basis these machinations may provide a viable "paper solution", they will not likely be embraced by the real world neighborhoods that will be impacted by this effort to shoehorn more traffic through what are actually local streets designed to accommodate local traffic.

Traffic Forecasts & Cumulative Impacts Analysis

The EIR states that:

"The version of the model used to develop the forecasts was modified to include the most recent planned land uses and transportation projects within the City of Sacramento."

However, neither the EIR nor the traffic appendix describes any of the projects that were considered and analyzed in the cumulative impacts analysis. It is not sufficient to state that the SACMET regional travel demand model accounts for all growth in background traffic through 2035. As nearby transportation improvement plans are discussed, so too must unbuilt but reasonably anticipated area development projects be described, and their effects quantified in the cumulative impacts analysis.

NOP commentors have already pointed out that important, large projects are on the horizon that could have a profound effect on the McKinley Village roadway network. These include the new Sutter General Hospital facility, Mercy Hospital expansion, Sutter Memorial Hospital in-fill project, the Downtown Arena, Sacramento Natural Food Co-Op, and the Sutter Landing Regional Park.

General Plan LOS Policy

The EIR cites General Plan Policy M 1.2.2 (a), which it argues provides the developer and the City with a free pass to exceed reasonable level of service thresholds. Specifically, this policy finds LOS F to be an acceptable level of service for intersections within the "Core Area" of the

city. While the City certainly can adopt such a policy, the City and the EIR cannot rely on that policy as a substitute for a rationally established threshold of significance in considering what impacts the traffic of future projects will have on that intersection. Such a policy cannot be used to give each project impacting a "covered" intersection a free pass, regardless of the amount of traffic it adds to that intersection. If a project would significantly worsen the performance of one of the intersections where LOS F is deemed "acceptable" by General Plan policy, that is a significant impact that must be disclosed and mitigated. The same applies to General Plan policies with lower LOS E, also used in the EIR to rationalize significant impacts.

Impacts to Roadway Segments Not Adequately Analyzed or Mitigated

The EIR declares that it did not adequately mitigate roadway segments for purposes of CEQA compliance, segment mitigation not being required because intersections are the most constraining part of the transportation network. This strange argument will be of very little comfort to the many residents living along affected roadway segments, at least one of which is forecast to operate at LOS E with the addition of project traffic and LOS F under cumulative conditions (see EIR Table 4.9-14). The EIR must provide mitigation for failing intersections, both at the project-specific level, and at the cumulative level.

Impacted Roadway Segments Not Analyzed

Particularly impacted roadway segments include 28th, 29th and 30th Streets, C Street and McKinley Boulevard, but these are not analyzed or are analyzed to an inadequate level. For instance, 29th Street is forecast to accommodate a full 30% of the project's outbound (AM) traffic between "C" Street and freeway access to the south. However, 29th Street is not analyzed in the EIR traffic discussion. Neither is 30th Street, which also warrants analysis.

Several major roadway segments the project depends upon are projected to operate at an unacceptable level of service. For instance, with project and cumulative traffic, 28th Street between C Street and E Street is forecast to operate at LOS F. With project plus cumulative traffic, this intersection is forecast to operate at LOS F during both the PM peak hour, with project traffic contributing 25% to the cumulative background traffic. This is a significant adverse impact that must be mitigated. The same is true for that segment of C Street west of 28th Street, which is also forecast to operate at LOS F with project and cumulative traffic. It should also be noted that both 28th Street and C Street are designated as local streets.

Currently viable neighborhood streets would lose parking and bicycle lanes as a result of the proposed lane closures, needing to shift lane directions back and forth between 2 and 1 lane in each direction for the AM and PM traffic pattern. This "cure" is worse than the "disease" that the proposed project mitigation will inflict on these neighborhood streets, especially along 28th Street and "C" Street. The loss of bike lanes also flies in the face of the assertion in the EIR that the project supports the SCS policies relating to bicycle use.

EIR Intersection Analysis Inadequate

As noted throughout our review of the EIR's transportation analysis, area roadway segments and intersections are already overtaxed, and only by further disturbing local residential neighborhoods and making them less accessible and less safe, can the project traffic be accommodated. Clearly, many of the area surface streets and intersections are not designed nor

do they have the capacity to safely and efficiently accommodate the additional traffic associated with the project. The following cites weaknesses in the EIR analysis that need to be reconsidered.

E Street/29th Street/SB Capital Freeway On-Ramp: Project traffic alone will push the E Street/29th Street/SB Capital Freeway On-Ramp from LOS C to LOS E, nearly doubling the delay time on this freeway ramp. With project plus cumulative traffic, this intersection is forecast to operate at LOS E (77 second delay) in the PM peak hour.

E Street/Alhambra Blvd Intersection: This intersection is already operating at LOS E in the AM peak hour and the addition of project traffic will worsen the delay by more than 26%. With project plus cumulative traffic, this intersection is forecast to operate at LOS F (127 second delay) during both the AM and PM peak hour.

H Street/Alhambra Blvd Intersection: This intersection is already heavily impacted, operating at LOS F in the AM and E in the PM peak hours. The addition of project traffic will increase the AM delay to 110 seconds (nearly two minutes) per vehicle. With project plus cumulative traffic, this intersection is forecast to operate at LOS F with a forecast 190 second (> 3 minutes) AM delay and 380 second (6.3 minute) PM delay. These are totally unacceptable impacts and represent a complete system breakdown in operations at this intersection.

Proposed mitigation for these impacts, which are limited to payment of some unquantified or unqualified fee to the City's traffic operations center for purposes of improving signal timing, cannot possibly adequately address the current intersection failure, much less a projected 3 to 6 minute delay with cumulative impacts.

Other significantly impacted intersections include the following:

C Street/28th Street Intersection: The EIR traffic analysis indicates that a full 52% of project traffic will enter and leave the site via the A Street bridge and then via 28th Street. Given a peak hour increase of hundreds of cars at this intersection, it is hard to understand how existing plus project traffic results in at most a 1 second delay increase. With project plus cumulative traffic, this intersection is forecast to operate at LOS E during the AM and LOS F (108 second delay) in the PM peak hour. This is a significant adverse impact that must be mitigated.

H Street/28th Street Intersection: With project plus cumulative traffic, this intersection is forecast to operate at LOS F during the PM peak hour with a delay of 164 seconds. This is a significant adverse impact that must be mitigated.

H Street/30th Street/NB Capital City Freeway Off-Ramps: This intersection is forecast to operate at LOS D in the AM and LOS C in the PM peak hour. With project plus cumulative traffic, this intersection is forecast to operate at LOS F during both the AM (124 second delay) and PM (314 second delay) peak hours. This is a significant adverse impact that must be mitigated.

McKinley Blvd/33rd Street Intersection: This intersection is forecast to operate at LOS B in both the AM and PM peak hour. With project plus cumulative traffic, this intersection is forecast to operate at LOS E in the AM and LOS F during the PM peak hours. This is a significant adverse impact that must be mitigated.

Freeway Ramp Operation: Table 4.9-22 of the EIR summarizes the project and cumulative impacts to the Capital City Freeway ramps serving the project area. As shown in the EIR, four of the five identified ramps are forecast to operate at LOS E or F in the M and/or PM peak hour.

Mitigating Impacts to Intersections

The EIR indicates that even with mitigation the level of service at study area intersections will continue to operate at unacceptable levels. The following assessment of proposed mitigation points to a need for further analysis and mitigation, or the need to adopt a statement of overriding consideration. The EIR should also include modified street diagrams (not just traffic movement schematics) to demonstrate how the mitigation will be implemented. The efficacy of proposed mitigation measures is discussed below.

H Street/Alhambra Boulevard, H Street/30th Street, and H Street 29th Street: Mitigation for impacts to these intersections include:

- The payment of a fair share amount to the City traffic operations center is meant to help pay for traffic signal optimization. What assurances can the City provide that the fees to be paid will actually be applied to mitigate impacts to these intersections?
- Lane restriping to combine through and turn lanes, which may ease some movements but may also reduce capacity for through-traffic.
- Removal of all on-street parking on the north side of "H" Street between 30th Street and Alhambra Blvd. This measure flies in the face of state-mandated implementation of "Complete Streets" strategies, removing or greatly limiting access to the existing bike lane.
- Prohibit on-street during peak periods on the south side of "H" Street and provide two eastbound lanes between 30th Street and Alhambra Blvd. The existing bike lane would be lost or seriously compromised and should be considered a significant adverse impact.

Bicycle, Pedestrian, and Transit Operations

The EIR only addresses alternative modes of travel in the most superficial manner and actually overstates the availability and safety of bicycle and pedestrian routes through the study area. Transit is given even less consideration, as described below.

Bicycle and Pedestrian Access & Project Impacts

The EIR states that:

"All roadways within the study area would be low-volume, low-speed streets conducive to bicycle and pedestrian travel." (p. 4.9-58)

This statement is not supported by the facts. Actually, the higher vehicle volumes being pushed onto local neighborhood streets and the need for AM and PM changes in two-lane flow argue

clearly for vehicle accommodation but not bicycle safety. Again, it is unclear what criteria were used to determine this project's consistency with any reasonable measure of applied principles of "Complete Streets" or other mitigation measures that assure accommodation of alternative modes of travel with safe vehicle operations. This is especially distressing in light of the already failing roadway network serving the project and vicinity.

The project fails to adequately provide access to bicycles. This is further indicated by the inconsistent manner in which the issue of bicycle facilities is discussed in the EIR. On the one hand, the EIR states that the proposed project will result in the generation of more bicycle and pedestrian traffic at the 28th Street UPRR crossing. At the same time, there is absolutely no discussion of, or provision for, bicycle access into the project via the "A" Street bridge.

With complete disregard for the General Plan's policies relating to improving and encouraging bicycle trips to lower vehicle miles travelled, and after discussing at length how traffic volumes on local streets would be significantly impacted in the future, the EIR recommends the total elimination or time-of-day closure of bike lanes throughout the study area.

Without any real analysis of existing bike facilities or project impacts on these facilities, the EIR simply concludes that:

"Implementation of the project would not remove any existing bicycle facility or interfere with any facility that is planned in the 2010 City of Sacramento Bikeway Master Plan."

This statement is false, given the elimination of bicycle lanes to accommodate project traffic.

Project impacts to area bicycle facilities are significant, and remain essentially unanalyzed and unmitigated.

Transit

Principles of sustainable communities, smart growth, complete streets and new urbanism all direct the planning process toward transit, bike and pedestrian access, and in general a more diversified transportation system, as an integral part of land use planning. The proposed project does not achieve any of the transportation goals identified by state mandates or progressive planning. With regard to transit, the EIR states:

"No transit enhancements are proposed as part of the project. However, the project access points would result in connections to existing bus stops that are as direct as possible (i.e., bicycle/pedestrian access at Alhambra Boulevard would provide for a direct route to the nearest bus stop to project located at the Alhambra Boulevard/E Street intersection; C Street access roadway would provide for direct route to stop located west of 40th Street/ McKinley Boulevard intersection)." (p. 4.9-58)

The nearest bus stop is at McKinley and Alhambra (Route 34) and its accessibility is premised upon the UPRR granting an easement for, and the construction of the proposed bike/ped tunnel at the northerly extension of Alhambra. Bus stops along McKinley are also located at Meister Way,

40th Street and San Antonio Way and are about 2,400 feet from the proposed project access tunnel at the extension of 40th Street under the UPRR lines.

There is no evidence that the transit authority was consulted. There is no investigation of or recommendation for the provision of a route adjustment that passes through the project or at least closer to it. The project fails to adequately provide access to transit, which is one of the General Plan criteria for tolerating LOS F operating conditions. The project should be redesigned and area roadways should be further evaluated and a real effort should be made to decrease the total dependency of this project on the automobile and more on alternative modes of travel.

Urban Design and Visual Resources

As with other sections of the EIR, the visual resources analysis precludes any discussion of aesthetic impacts relating to project residents, on the basis that the Ballona decision precludes the need for such analysis. As a result, there is no analysis in the EIR of the visual impact that trains passing 20 to 30 feet above a resident's back yard will have on that resident, or on the aesthetic environment of the project in general. There is no analysis of the impacts to the residents of 13 to 18 foot high walls adjacent to the freeway, that will block scenic vistas to the north. There is no analysis of the impacts of train headlights on residential sensitive receptors. This section of the EIR fails to provide any analysis of these impacts, contrary to professional planning practice, and, we believe, the intent of CEQA. The implementation of the project will significantly impact the scenic vistas from the project site, and will result in significant light and glare from the railroad. These impacts must be considered in the City's consideration of the project.

Project Alternatives

The Alternatives discussion in the EIR is insufficient in a number of areas, as described below.

The EIR dismisses the need to consider an alternative site for the proposed project, on the basis that the proposed project is consistent with the General Plan designation for the site. However, as stated in the General Plan, the Planned Development designation was created for

"...four areas with pending projects that are in the development review process as of March 2009. These include McKinley Village, Panhandle, Camino Norte, and Natomas Crossing.

Specific land use and urban form designations (i.e., designations outlined in this plan) will be applied to these areas once planning is complete and the City has approved the development."

It is clear that no analysis of the potential land use impacts associated with these four projects was included in the General Plan, and that consistency with the General Plan in this case does not apply. This is evidenced by Land Use Policy 10.1.5, which prohibits the use of Planned Development on any other site in the City:

"The City shall not designate any other areas Planned Development beyond those shown on the Land Use and Urban Form Diagram as of March 3, 2009."

There clearly was no intent to use the Planned Development designation as a viable land use category beyond creating a place-holder for four specific pending projects. The issue of land use compatibility was not a consideration. Therefore, the argument that no alternative site need be analyzed is invalid. Alternative sites for the project should be considered.

No Project/Existing Zoning Alternative

The use selected for the No Project/Existing Zoning alternative appears to be overly speculative and unrealistic, particularly since CEQA requires that alternatives selected be feasible and credible. In this case, and given the existing Cannery Business Park immediately south of the proposed project, a business park, warehousing or manufacturing use would be more likely for the site. The physical barrier created by the rail embankment makes the selection of the use as a rail yard particularly unlikely. The relatively lower impacts associated with a business park or warehousing use would be a more realistic scenario for consideration in the alternatives section. Such a use would also improve the jobs-housing balance for the area, a critical component of SB 375's Sustainable Communities Strategy; and would take advantage of the future interchange at BUS-80, limiting through-traffic on City streets.

The analysis of this and other alternatives is highly speculative, and does not provide the public, or the City's decision makers with sufficient information to make an informed decision on the project. Insufficient data has been provided to allow a meaningful analysis and evaluation of this alternative when compared to the proposed project. For example, on page 5-11, the EIR states that it is assumed that impacts associated with toxic air contaminants would be significant, pending further study. This is unacceptable under CEQA. The level of analysis must be sufficient to determine the level of impact of the alternative, and compare it to the proposed project. The EIR must provide analysis-based conclusions, not speculation based on lack of analysis. Such speculation is also used as it relates to noise. The EIR specifically states that it is not known whether the rail embankment would attenuate noise levels created by a rail maintenance yard, and that noise impacts to sensitive receptors south of the site will be higher than those of the proposed project. Since it is clear that no use-specific noise analysis of the rail maintenance alternative has been conducted, there is no basis for the statement.

Finally, the issues associated with land use compatibility and General Plan consistency are addressed in one sentence. There is no analysis of the surrounding land uses, other than the residential neighborhoods to the south and east. No discussion of the 28th Street landfill site and the Cannery Business Park in relation to an industrial use on the site is provided. As with the Land Use and Planning discussion in Section 3 of the EIR, these issues are ignored. This is contrary to the requirements of CEQA, and results in incomplete information for the public and the City's decision makers.

Lower Density Alternative

The land use assumptions under this alternative are clearly designed to make this alternative un-approvable. Specifically, the assumption is made that although the unit count would be reduced by only 30%, most of the project amenities would be removed: there would be a park but no recreation center; there would be no walls behind the homes abutting the railroad embankment; there would be no pedestrian or bicycle access to Alhambra. No explanation for eliminating all of these amenities is made other than the unsupported statement that the this alternative "would

not include a recreation center because there would be too few units to support this type of a use." The reduction in density is insufficient grounds to eliminate all project amenities. The applicant would still be required to meet the General Plan requirements for support services and facilities within the neighborhood, and to provide safe pedestrian and bicycle routes for residents. Accordingly, a more realistic lower density alternative should be considered.

As with Alternative 2, conclusions are speculative and not based on analysis: it is assumed that the bordering residential units would not provide the same level of noise attenuation as with the proposed project, but there is no factual data to support the conclusion; it is assumed that the 'regional benefits' would be less, but there are no facts to support the conclusion.

Finally, the conclusion that this alternative would not support SACOG's SCS is completely unsupported. The lower intensity alternative provides a range of residential units at a density consistent with surrounding neighborhoods. There is no supporting information in the General Plan to conclude that the alternative would not be consistent with the 'Neighborhood Opportunity,' since there is no description of what that 'Neighborhood Opportunity' is in the General Plan.

Since neither the proposed project nor the Lower Density alternative provide for a mix of single-family, second units, duplexes, tri-plexes, four-plexes and apartments, as required for Traditional Neighborhoods, the two are consistent in land use. Conclusions reached regarding the failure of this alternative to meet project objectives are therefore inappropriate. The only alternative that meets both the SCS and the General Plan policies is the Mixed Use Alternative, whose impacts are clearly more intense than the proposed project.

Conclusion

As described above, we believe that the EIR is technically flawed, and significantly understates the potential impacts of the project on the environment. Specifically, impacts associated with General Plan consistency, air quality and related health risks, flooding, noise associated with both rail and vehicle trips, off-site improvement impacts and traffic are all significant, and must be properly mitigated.

The EIR must be corrected and re-circulated to allow a comprehensive explanation of the true impacts of the project, and the mitigation measures required to lower those impacts to less than significant levels, if possible.

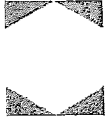
If you have any questions or require additional information, please feel free to contact me.

Sincerely,



Nicole Sauviat Criste
Principal

EXHIBIT B



HEXAGON TRANSPORTATION CONSULTANTS, INC.

January 9, 2014

Ms. Dana Allen, Associate Planner
City of Sacramento
Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Subject: Comments on Transportation Analysis in the McKinley Village Environmental Impact Report

Dear Ms. Allen:

Hexagon Transportation Consultants, Inc. has reviewed the transportation analysis included in the Draft Environmental Impact Report (EIR), dated November 2013, for the proposed McKinley Village project. Our review was completed on behalf of the East Sacramento Residents for a Better Community. We have identified some aspects of the analysis for which we believe additional study is necessary. We believe additional study is necessary of local street impacts, the proposed intersection mitigation, the cumulative traffic assumptions, the cumulative road network, the impact of cumulative development, transportation impacts to schools, transit access, and project alternatives.

Local Street Impacts

The project proposes an eastern access road that would connect to C Street near 40th Street. From this point, according to the EIR, some traffic would travel to and from the west, eventually accessing the Capital City Freeway or proceeding to or from the downtown area. Since C Street doesn't connect to or across the freeway, this traffic must make its way to E Street or other streets to the south. The opportunities for crossing over to E Street are limited. The closest opportunity is via 35th Street. Other opportunities are via 34th Street, 33rd Street, 32nd Street, and (farthest) Alhambra Boulevard. Alhambra is more of a major street than the others so the EIR assumed most traffic would use Alhambra. The other streets are narrower and lined with single-family homes. None of these streets are analyzed in the EIR (although some of their intersections are analyzed).

Hexagon questions whether most of the project traffic would use Alhambra, as opposed to, say, 33rd Street. Alhambra is more of a major street, but 33rd Street is closer to the project site. There are several stop signs on C Street that slow down traffic from the site to Alhambra. Based on the intersection counts, Hexagon estimates that 33rd Street carries about 1,300 vehicles per day. According to the EIR the project would add 875 vehicles per day that need to get between C Street and E Street (Figures 4.9-7 and 4.9-8). If those vehicles, or a large portion of them, were to use 33rd Street, the percentage increase in traffic on 33rd Street would be substantial (as much as 67%). Hexagon questions whether a traffic volume that high would be appropriate for a narrow street lined with homes. Certainly there would be a quality of life impact.

The EIR needs to study in more detail the existing and project volume on the following streets: Alhambra Boulevard, 32nd Street, 33rd Street, 34th Street, and 35th Street. Any impacts should be identified and mitigated based on quality of life parameters.

Proposed Intersection Mitigation



The EIR identifies two intersections that would experience significant traffic impacts as a result of the project: E Street/Alhambra Boulevard and H Street/Alhambra Boulevard. The H Street/Alhambra intersection would experience a significant impact under existing + project conditions, and both intersections would experience significant impacts under cumulative + project conditions. The mitigation for H Street/Alhambra under existing + project conditions is stated as signal retiming.

The EIR does not explain how signal timing revisions at H Street/Alhambra would reduce the project impact to a level of insignificance. Is the existing signal timing inefficient? If so, why is it inefficient? Are there other factors influencing the timing, such as signal progression needs, pedestrian crossing times, or clearance intervals for safety? If so, then changing signal timing is not an option. If not, the signal timing could be changed independent of the project. If the timing were made efficient now, would the project impact remain? If signal retiming is not possible or if the project impact would remain, additional mitigation is necessary.

Under cumulative + project conditions, the EIR states that additional mitigation is necessary at H Street/Alhambra beyond signal timing. The mitigation is to eliminate on-street parking and restripe H Street such that it essentially has two lanes in each direction between Alhambra and 30th Street. However, H Street is only about 48 feet wide at that point, according to our measurements. In order to provide four lanes it would be necessary to also eliminate the eastbound bike lane.

The elimination of on-street parking and a bike lane would negatively affect the bicycle and pedestrian environment on H Street and, therefore, runs counter to the current Caltrans direction in California to develop and maintain streets for all modes – “Complete Streets.” Thus, the proposed mitigation should be considered infeasible. Either the impact should be identified as significant and unavoidable, or alternative mitigation is needed, such as reducing the size of the project.

Similarly, a significant impact is identified under cumulative + project conditions at the intersection of E Street/Alhambra Boulevard. The mitigation is stated as removing on-street parking and a bulb-out island on Alhambra to create room for a right turn lane. There is no discussion of the purpose for the original installation of the bulb-out and how that purpose would be affected by its removal. Also, the mitigation would require the removal of a bike lane, which is not discussed.

The removal of the bulb-out, bike lane, and on-street parking would negatively affect the bicycle and pedestrian environment on Alhambra. Thus, the mitigation would run counter to Complete Streets requirements and would be directly contrary to the Project Objectives, which include creating a “development that promotes bicycle use.” The proposed mitigation should be considered infeasible. The impact should be identified as significant and unavoidable, or alternative mitigation is required, such as reducing the size of the project.

Cumulative Traffic Volume

A comparison of Figures 4.9-6 and 4.9-10 shows a tremendous traffic increase on several streets in the study area as a result of cumulative development. Some of the streets are shown to have their volume increase three-fold: 28th Street, 29th Street. The following streets are shown to have volume increases of more than 200 vehicles during either peak hour: 28th Street, 29th Street, C Street, E Street, I Street, 30th Street, H Street, and McKinley Boulevard. The EIR offers no explanation as to why these volumes will increase so substantially. Most of the streets in the study area are two-lane residential streets lined with single-family homes. Residents deserve an explanation as to why the traffic volume in front of their homes is predicted to increase so substantially, even without the McKinley Village project. The EIR states that the cumulative



volumes come from the SACMET regional travel demand model, and some explanation of the increases is given on page 4.9-64. However, this explanation is insufficient. There is no explanation for why traffic would increase on E Street, H Street, I Street, or McKinley Boulevard.

Cumulative Road Network

The EIR states that the cumulative road network includes several significant changes in the study area: Sutter's Landing Parkway and its new interchange with the Capital City Freeway, the closure of the E Street on-ramp to the Capital City Freeway to make room for a new eastbound transition lane on the freeway. These changes to the road network would have profound impacts to local circulation. C Street would see substantial increases in traffic and so would the streets that connect C Street to the other east-west arterials (28th and 29th). The traffic currently using the E Street on-ramp would be shifted to the J Street on-ramp and would need to filter through neighborhood streets to get there.

A search of Sacramento and Caltrans planning documents shows that the improvements included in the cumulative scenario are far from certain to occur. They are subject to much further study, and they are not funded. Therefore, since they are not "reasonably foreseeable" (to use CEQA parlance) they should not be included in the EIR. A new cumulative scenario should be developed and analyzed that does not include these speculative road network changes.

Also, the location of the potential new interchange at Sutter's Landing Parkway raises questions with regard to the McKinley Village project. The EIR should include a diagram of the interchange so the interface between the two projects is clear. Would the footprint of the interchange impinge on the McKinley Village property? Would the McKinley Village project, as proposed, limit or preclude certain design options for the interchange? The EIR mentions that the interchange would connect only to and from the west. It seems that a connection to the east might reduce or eliminate a lot of the traffic problems that the East Sacramento neighborhood is now experiencing. Why is a connection to the east not being considered? If the interchange could not tie into the existing C Street or Elvas on the east side, could it at least tie into the proposed McKinley Village project, thereby reducing neighborhood impacts?

Impact of Cumulative Development

The EIR shows that the cumulative + project scenario would result in 7 intersections within the study area operating at Level of Service (LOS) E or F (Table 4.9-15). Three of these intersections would have average delays of over 100 seconds (LOS F) during the peak hours: H Street/30th Street, E Street/Alhambra Boulevard, and H Street/Alhambra Boulevard. LOS E or F represents congestion and long delays for motorists trying to get into and out of the neighborhoods. They also represent long queues and vehicles idling in front of people's houses. However, Sacramento has a General Plan policy that says LOS F is OK within the Core Area and LOS E is OK within multi-modal districts. Therefore, most of these cumulative LOS deficiencies are not considered impacts under CEQA. However, Hexagon would argue that quality of life and Complete Streets issues need to be considered.

LOS E and F represent congested conditions that are not keeping with single-family neighborhoods and detract from the utility of the streets for pedestrians, bicycles, and buses. LOS E or F may be more compatible with streets that serve industrial or commercial development, but not residential where quality of life should be considered. In Hexagon's opinion, Sacramento should reconsider the General Plan policies with regard to the Core Area and multi-modal districts and not accept poor levels of service on streets that are residential in character.



According to Table 4.9-5 in the EIR, all but two of the intersections in the study area currently operate at LOS D or better. The two exceptions are E Street/Alhambra and H Street/Alhambra. Therefore, the poor levels of service predicted for all the other intersections under cumulative conditions are entirely due to new development, such as the proposed McKinley Village project and are not inevitable. The City could choose to restrict new development to a size or location that would result in generally acceptable levels of service.

Transportation Impacts to Schools

Based on our past experience, Hexagon has noted that schools are often points of congestion and safety concerns due to parents dropping off and picking up students. The EIR includes an analysis of impacts to study intersections near Theodore Judah Elementary School but includes no discussion of congestion or safety in front of the school. Also, there is no analysis of operations near Sutter Middle School to which the McKinley Village project would add students. A more complete school analysis should be prepared and included in the EIR. If safety or operational problems are noted, the McKinley Village project should be required to correct them in proportion to its impact. Hexagon notes that the proposed McKinley Village project is not within comfortable walking distance of any of the schools that students would attend, and therefore, most students would be driven to and from school. This would add to the number of vehicles already dropping off and picking up students.

Transit Access

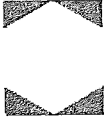
The closest bus stop to the project site is located close to a mile away. This is well beyond the typical $\frac{1}{4}$ mile walking distance that is used within the planning community to judge transit accessibility. Therefore, it must be concluded that the project is not served by transit. The EIR erroneously states on page 4.9-61 that project residents would be provided adequate access to transit. Unless the project intends to run its own shuttle buses, this statement is incorrect.

Nor would the project create a big enough potential transit market to justify the extension of service into McKinley Village. Given typical transit mode splits of around 3%, the project would generate only about 100 daily boardings and alightings (50 boardings, 50 alightings) if it had bus service. This level of ridership would not justify the expense of extending a bus route.

Page 4.9-46 of the EIR lists the criteria by which to judge significant impacts. For transit, one of the criteria states: "Fail to adequately provide access to transit." Clearly the project should be found to have a significant adverse transit impact based on this criterion. Possible mitigation could include the development providing its own shuttle bus service (this could help with school access, as well) or by reducing the size of the development.

Project Alternatives

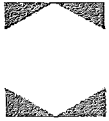
The EIR includes project alternatives that would reduce the amount of traffic that would be generated in comparison to the proposed project. In particular there is a reduced-density residential alternative that would include 226 dwelling units (142 fewer units than the proposed project). This alternative is given only a cursory analysis. However, this alternative, or a similar reduced-density alternative, has the potential to reduce the traffic impacts to a level of insignificance. The analysis should be completed to see if this is the case. If a project with 226 units still would have significant traffic impacts, then the EIR should include an alternative that would avoid those impacts.



Summary

The following summarizes the comments and questions raised in this letter.

1. The analysis of roadway capacity (Tables 4.9-4, 4.9-9, 4.9-18) should be expanded to include several additional north-south streets: 29th Street, 30th Street, Alhambra Boulevard, 32nd Street, 33rd Street, 34th Street, 35th Street. The rationale for assigning project traffic to each of these streets should be explained and justified. Any impacts should be identified and mitigated. Impacts should include impacts to other modes (transit, pedestrian, bicycle) and to quality of life (air quality, noise, visual). Mitigation should include a reduced project size.
2. The mitigation described for the intersections of E Street/Alhambra and H Street/Alhambra are either illogical (signal timing changes), geometrically infeasible (4 lanes on H Street), or would negatively impact other transportation modes (elimination of bike lanes, on-street parking, and a bulb-out). These mitigation measures should be considered infeasible. Either the impacts should be identified as significant and unavoidable, or the project should be reduced in size sufficient for the impacts to be less than significant.
3. The EIR should provide much more detail about the cumulative traffic forecasts. There needs to be a description of why traffic is expected to substantially increase on several neighborhood streets. For each street with a large increase, there should be a description of whether the increase is attributable to road network changes or land use growth. The streets in question are 28th Street, 29th Street, C Street, E Street, I Street, 30th Street, H Street, and McKinley Boulevard. For each street the reader should be informed as to why the traffic increase would happen, i.e., where does the traffic originate and where is it going to?
4. Two highly speculative road network changes were included in the cumulative traffic analysis: closure of the E Street on-ramp to the Capital City Freeway, and a new interchange on the Capital City Freeway at Sutter's Landing Parkway. The cumulative analysis should be rerun without these road network changes since they are not reasonably foreseeable. They are not designed or funded.
5. Notwithstanding the above, the EIR should include a much more complete picture of the planned Sutter's Landing Parkway interchange. Please provide diagrams of the design options. Would the McKinley Village project impinge or limit the design options? Could the interchange tie into the road network to the east in addition to the west? Could the interchange tie into the McKinley Village project? How would traffic in the study area change with each of the design options? How would the McKinley Village impacts change with each of the design options?
6. The EIR identifies that under cumulative conditions severe congestion will occur on the primary routes in and out of the Midtown and East Sacramento neighborhoods. The EIR excuses these cumulative impacts by stating that the City policy accepts LOS F in the Core Area. However, this congestion would have substantial impacts to residents of these neighborhoods in terms of delays, access to emergency services, noise, air quality, comfort levels for pedestrians and bicycles. The EIR should identify how Sacramento plans to avoid or mitigate these intolerable levels of congestion, to which the McKinley Village project would contribute.
7. Because of the distance to the closest schools, most students from the McKinley Village project would be driven to school. The EIR needs to include an analysis of potential traffic impacts to nearby schools that could result due to the McKinley Village project. The analysis should focus on operations and safety during the drop-off and pick-up time periods.
8. Hexagon believes that the project would have a significant transit impact (as defined in the EIR) because it is not reasonably accessible to any transit services. The EIR should acknowledge this impact and explore mitigation, including reducing the size of the project.
9. Many of the significant transportation impacts of the project could be reduced or eliminated by pursuing the Reduced Density alternative that is included in the EIR. A more complete analysis of this alternative should be done to determine if it would avoid any impacts.



Ms. Dana Allen
January 9, 2014
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We appreciate the opportunity to submit these comments. Please do not hesitate to contact us with questions.

Sincerely,

HEXAGON TRANSPORTATION CONSULTANTS, INC.

A handwritten signature in black ink, appearing to read "Gary Black".

Gary Black, President

Elizabeth Schlegel, PE C73999
 3272 C Street
 Sacramento, CA 95816
 707-206-8593
 eregan06@gmail.com

December 20, 2013

Ms. Dana Allen, Associate Planner
 City of Sacramento, Community Development Department
 Environmental Planning Services
 300 Richards Boulevard
 Sacramento, CA 95811

Dear Ms. Allen,

As both a practicing registered civil engineer and a resident of the study area included within the Draft Environmental Impact Report (DEIR) for the McKinley Village Project (P08-086). I have reviewed the DEIR, and found that many of my concerns were addressed within the document, such as how the project would address impacts to the existing combined sewer & storm drain system. However, I do have several remaining concerns relating to traffic through the eastern portion of the study area that I do not feel that the EIR has sufficiently considered and/or addressed.

Inadequate Roadway Width on C Street from Alhambra Boulevard to 33rd Street

In various sections of the DEIR, C Street from Alhambra Boulevard to 33rd Street is identified as a major collector street, which per the roadway classifications provided on page 2-197 of the City of Sacramento's 2030 General Plan requires a right of way width of approximately 60 to 120 feet. The street right-of-way width provided on the Sacramento County Assessor's Parcel Map for this area is 80 feet for C Street, meeting this requirement, however, the measurable roadway from curb to curb is approximately 34 feet along C Street including the width available for bike traffic and parking, as measured from Google Earth.

To give perspective to the existing inadequacy of C Street as a "major collector" street, standard parking stalls are 9 feet wide. This means that C Street is not as wide as 4 standard-size parking stalls, yet this street currently supports 1,000 trips per day, with traffic in both directions and with parking allowed on both sides of the street. The DEIR suggests that the "cumulative plus project" condition would add over an additional 1,000 peak hour trips per day down C Street, and calls this impact "Less than Significant". Even the project-only increase of 12% of peak hour traffic will be a notable impact to the residents, regardless of the Level of Service (LOS) projected at the affected intersections under post-project conditions.

Traffic Impact Study Trip Count/Projections, Intersection of C Street & 33rd Street	AM Peak, Volume Total				PM Peak, Volume Total				AM Peak Total	PM Peak Total	Daily Peaks Total	% Increase over Existing
	EB 1	WB 1	NB 1	SB 1	EB 1	WB 1	NB 1	SB 1				
Existing Conditions	192	264	96	10	151	267	41	100	562	559	1121	-
Existing Plus Project Conditions	203	308	99	10	186	295	51	100	620	632	1252	12%
Cumulative Conditions	485	410	115	15	425	400	70	130	2050	1025	2050	83%
Cumulative Plus Project Conditions	496	442	118	15	460	421	80	130	2162	1091	2162	93%

Ms. Dana Allen
December 20, 2013

In various sections of the DEIR, McKinley Boulevard from Alhambra Boulevard to 33rd Street is identified as a minor collector street, requiring a right of way width of 40 to 80 feet. The measurable roadway along McKinley Boulevard from Alhambra Boulevard to 33rd Street from curb to curb including the width available for striped Class II bike paths and parking, but not including frontage and sidewalk, is approximately 56 feet, and if the sidewalks and frontage are included, McKinley Boulevard is approximately 75 feet wide. This existing street width makes McKinley Boulevard a much better candidate for a major collector street than C Street, and the EIR should consider the impact of rerouting traffic through the more-appropriate route, rather than propose to maintain existing, inadequate traffic patterns.

Additionally, in various sections of the DEIR, 33rd Street is identified as a bicycle route, with no further classification. Section 4.9.2 begins to describe existing traffic conditions on 33rd Street, but does not separate the street into two separate study segments at McKinley Boulevard after describing how the street narrows adjacent to McKinley Park. At no point does the DEIR identify the roadway classification of 33rd Street. The street right-of-way widths provided on the Sacramento County Assessor's Parcel Maps is 64.5 feet for 33rd Street, making 33rd Street a candidate for a major or minor collector street.

Finally, Section 4.9.3 of the DEIR identifies the McKinley Park neighborhood, including McKinley Boulevard, 33rd Street, and C Street, as a Neighborhood Traffic Management Program (NTMP) area. I am regularly stuck in my driveway by eastbound traffic queuing at the stop sign at 33rd Street in the mornings under existing traffic conditions, and will petition my neighborhood to move to Phase II NTMP measures to avoid the 258% increase in eastbound morning peak hour "cumulative plus project" traffic projected in the DEIR. This will entirely alter the routes studied by the DEIR. The DEIR does not sufficiently address the potential impacts of the NTMP classification of these neighborhoods, since neighborhood action can re-route all traffic studied within the neighborhood boundaries.

Please address the following in the EIR:

- Appropriate roadway classifications for C Street, McKinley Boulevard, and 33rd Street based on existing street widths, including the reasoning for the classification.
- Study appropriate paths of travel, using continuous and appropriate roadway classifications, with no dead-ends of arterial or collector routes.
- Include discussion of how the additional traffic will impact the narrow, residential portion of C Street in the long term.
- Address the feasibility and impacts of widening C Street to accommodate traffic and the resultant environmental impacts, including the number of trees to be included in the urban deforestation of an established neighborhood due to the locations of the existing, established street trees within the roadway right of way.
- Include discussion of how traffic can be removed from the residential portion of C Street, given that regardless of the right of way width, the current street improvements cannot support 1,000 additional daily peak hour trips.
- Study alternative traffic routes to avoid the need for future NTMP area improvements.
- Include a map of available routes for cumulative plus project traffic if NTMP areas move to Phase II traffic calming measures.
- Study differing portions of 33rd Street independently, identifying the roadway classification of each segment.

- The City's long-term traffic routing plans where known, including a color-coded map of planned improvements.

Changes in Traffic Patterns Due to Signalization

Mitigation Measure 4.9-6(c) proposes a traffic signal at the McKinley Boulevard/33rd Street intersection to address Level of Service F (LOS F) conditions under cumulative conditions. Much of the non-residential traffic currently impacting the McKinley Boulevard/33rd Street intersection would likely choose alternate routes as a perceived "time savings" to avoid the traffic signal, thereby increasing the total number of trips at the surrounding intersections. Also, as a resident, I have observed that the peak hour delays at this intersection are typically caused by park users such as joggers, not by vehicular traffic; studying this would require a detailed on-site study, rather than a typical traffic study without a physical observer present. Please incorporate the following into the EIR:

- Include an observational study of why the McKinley Boulevard/33rd Street intersection currently meets LOS D and F conditions.
- Include detailed discussion of how installing a traffic signal at the McKinley Boulevard/33rd Street intersection will change the LOS at this intersection.
- Include detailed discussion of the impacts of installing the McKinley Boulevard/33rd Street traffic signal on the surrounding portions of the study area.
- Address the LOS of the signalized intersection and adjacent intersections after this improvement is installed.

Project Access to Area Freeways

Caltrans is considering closing the E Street northbound onramp to Interstate Business 80 to mitigate existing traffic problems, which will substantially alter traffic patterns through the McKinley Park neighborhood, which is used by many commuters as a shortcut to avoid traffic. If traffic pattern alterations due to the closure of this onramp are unacceptable through East Sacramento via H and J Streets and Folsom Boulevard, either the closure will not be feasible, or traffic rerouting will require an additional interchange, which would alleviate traffic impacts on City streets in the eastern part of the project areas, particularly at peak hours. Please address the following in the EIR:

- How the project will reach the area freeways both if the E Street onramp remains open, and if it closes, and the subsequent study area and LOS impacts.
- The feasibility of incorporating a highway interchange to serve existing traffic on Elvas Avenue including a widening and extension of Lanatt Street to Interstate Business 80.

Truck Routes

The DEIR identifies several streets considered to be truck routes through the study area, including 29th Street, 30th Street, Alhambra Boulevard, and C Street (from 16th Street to Alhambra Boulevard). Three of these streets are parallel, and the C Street truck route identified is discontinuous. The City's truck routes are available through the City of Sacramento's transportation department website. The easterly-most north-south truck route identified on the City's map is Alhambra Boulevard. As a resident, I have observed that many of the non-STAA length trucks navigating East Sacramento use C Street as a preferred route, although it is not a designated truck route and likely does not have an adequate structural section to support this traffic,

Ms. Dana Allen,
December 20, 2013
Page 4

particularly with the addition of construction traffic for McKinley Village. Please include the following in the EIR:

- A map of all truck routes throughout the study area.
- A map showing possible construction routes overlaid on the existing truck routes in the study area.
- The number of trucks identified during the traffic studies travelling on non-truck routes.
- The projected increase in truck traffic both during and after construction, not based on Caltrans' percentages as is currently discussed in the DEIR, since Caltrans is based on highway traffic, not local truck route traffic.

If you or the EIR team would like to follow up with me, I can be reached at 707-206-8593. Thank you for your time, and for the very impressive public outreach efforts that have been a part of this project. I am confident that this project can provide a benefit to the existing and future residents of the affected area, and that the City and the project team are committed to making this project successful.

Sincerely,



Elizabeth Schlegel, PE C73999

Ms. Dana Allen, Associate Planner
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300 Richards Blvd, 3rd Floor
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dallen@cityofsacramento.org

January 10, 2014

Re: Comments regarding the (Revised) - Draft Environmental Impact Report (DEIR) for the McKinley Village Project (P08-086)

Dear Ms. Allen:

Thank you for the opportunity to submit comments on the DEIR for the proposed McKinley Village project. This project would be located adjacent to Midtown where I live and Sutter's Landing Park which I use nearly daily for recreation. I am familiar with the biological resources of the area including the proposed project area and am also a daily bicyclist in the greater area. I reviewed the DEIR primarily from these perspectives and also previously provided comments on the NOP for the proposed project.

As proposed, the McKinley Village project would have significant impacts to Sutter's Landing Park and the parkway. These include both temporary and long-term impacts to sensitive wildlife species, their nesting and foraging habitat, and open space that provides a corridor for their movement throughout the parkway. The enjoyment and recreational values the public receives from these natural resources would also be impacted, which is not adequately mitigated by the proposed project.

Local non-profit organizations including Friends of the River Banks, Friends of the Swainson's Hawk, Friends of Sutter's Landing Park and others are actively educating the public about the natural resource and wildlife values present at Sutter's Landing Park. The Park and adjacent open space areas including the proposed project area lands all contribute to these important values for the public and the American River Parkway. I support these efforts and believe the city should avoid unnecessary impacts to the park and require all project activities that impact Sutter's Landing Park to be fully mitigated for them onsite and endorse the long term vision for the Park.

The DEIR should be recirculated to address important issues that were raised during the NOP process as shown in the public record. The DEIR failed to analyze the potentially significant cumulative impacts from adjacent/nearby current and future developments already approved and contemplated by the City of Sacramento on the American River and Parkway in regards to, but not limited to public safety and the ability of the Parkway's natural and recreational resources to withstand a potentially significant increase in use. The DEIR also failed to address the already significant impacts on the River and Parkway's natural and recreational resources from increased use at Sutter's Landing Park as a result of the proposed project.

The DEIR for the proposed project has done an inadequate job of identifying existing

natural resource values at Sutter's Landing Park and the Parkway or included actions to avoid unnecessary impacts to those values. The DEIR has not done an adequate job of fully mitigating when this is deemed not possible.

The introduction and scope section of the DEIR section indicates that regulatory agencies may make the landfill operator make design modifications in connection with improvements to A Street and integrity of the landfill, and access to monitoring equipment. Any requirement for such modifications that are the result of the proposed project should be the responsibility of the project developer unless it can be shown that the changes would have been required in any case.

The introductions and scope section also indicates that the proposed project would not result in significant and unavoidable impacts so the City Council would not be required to adopt a Statement of Overriding Considerations if it approves the proposed project. This statement is poorly written and seems premature at this stage of the DEIR assessment.

The DEIR indicates that the most current information available was used to evaluate impacts from the project. This is not accurate as there was little or no effort to make use of data collected onsite by local organizations and individuals.

Throughout the DEIR Sutter's Landing Park is not accurately described or represented. "...the former City of Sacramento 28th Street Landfill to the north across Capital City Freeway (the former landfill site has been designated as a regional park-Sutter's Landing Regional Park..." It is more accurate to identify it as a park and former landfill, not the reverse which unnecessarily downplays this designation and the long-term vision for it.

The proposed project identifies a mix of evergreen, deciduous, and coniferous trees (redwood, pine) to be used as a landscape buffer. This is not appropriate as these trees are not native to the area or compatible with Sutter's Landing Park and the parkway resources. Trees planted as landscape buffers around the project site should be native and adapted to the immediate area as well as representative of the adjacent parkway and serve to support the area as a gateway to the American River Parkway.

The use of City-owned land on the proposed project parcel for stormwater infrastructure is inappropriate unless those features would be needed for Sutter's Landing Park and/or the existing landfill. Any conversion of this land for project use must be adequately mitigated within the immediate area. The area in question now serves as wildlife habitat and a corridor connecting the parcel the Sutter's Landing Park.

Delaying the construction of the pedestrian/bicycle tunnel until the third phase of the project would lessen the effectiveness of this feature. It should be constructed in the initial phase of the project to maximize the time the residents have to make use of it. This feature should also be a requirement of the project, not left to being a possible feature as determined by UPRR.

The “off-site” improvements described for A Street are not adequate and don’t include the loss of this area as open space serving as a wildlife corridor connecting the property with the rest of Sutter’s Landing Park. It would also eliminate plans to restore this area for increased wildlife nesting and foraging habitat consistent with the long-term vision for this area of the park. Mitigation is necessary to fully mitigate for this impact and should be required to return these natural resource values to Sutter’s Landing Park.

The DEIR does not do an adequate job of describing the long-term vision for Sutter’s Landing Park including conserving and restoring sensitive wildlife species habitat. To say the area is “slated for development as a park” is not accurate and actually misleading. It also downplays the need to fully mitigate for impacts to these values at Sutter’s Landing Park, and limits the options for the long-term vision for the Park if the proposed project is approved as described now. As proposed, the project is not consistent with the SACOG Blueprint and would actually be a development into “greenfields” such that Sutter’s Landing Park and the American River Parkway provide a richer biodiversity by conserving natural resources in sensitive areas.

Alternative 2 for no project assumes the site would be developed consistent with existing zoning. This should be modified or expanded to include an alternative or option that looks at zoning changes that would add the parcel to Sutter’s Landing Park. Project alternative analysis should include an option to rezone the property as an addition to Sutter’s Landing Park directly adjacent to it and enhance habitat conservation, restoration and recreation values. Such an alternative would clearly be preferred as superior from an environmental standpoint and would not require any mitigation. These lands could serve as mitigation for other proposed projects in the area and previous impacts in the area as well. There are opportunities to secure public funds as grants for such a purpose. The proposed project, as described, is certainly not environmentally superior when alternative zoning is considered as should have been done.

The CDFG Special Animals List January 2011 may not be the latest or most up to date source for this information. There is often a backlog of information submitted to CNDDB including observations from the project area and vicinity that must be considered. Local observations made at Sutter’s Landing Park and the project area and vicinity have not been included or adequately addressed. This information is available but was not requested or referred to in the DEIR.

The biological survey for the proposed project was very limited and incomplete. Species commonly seen onsite such as jackrabbits and others were not noted. Instead of facts, speculation was made about the level and type of activity by sensitive species. These assumptions conflict with actual observations made by those who frequent the area during events at Sutter’s Landing Park and other times.

Field observations have shown that sensitive raptors including Swainson’s hawks and white-tailed kites frequent the project area especially during the nesting season. Both of these species and other raptors are known to nest annually in the immediate area and

rely heavily on foraging habitat at Sutter's Landing Park and the adjacent project area which is effectively a single area for mobile species. The biological consultant agreed in personal discussions onsite that more field work would be necessary to adequately understand the value of the area to these species.

A second active Swainson's hawk nest is known near the proposed project and was monitored by myself and others in 2013. This was discussed with the biological consultant during survey work. This site is along the river directly adjacent to Sutter's Landing Park and the adult Swainson's hawks commonly foraged there and at the project site. This information was not acknowledged in the DEIR or biological report. Similar nesting and foraging has been noted and monitored in previous years.

The DEIR and biological report makes assumptions about prey availability based on a single visit last year. Assumptions are made about management activities on the site including mowing and discing but these are not documented. These assumptions do not agree with observations made by myself and others.

The DEIR includes an analysis of suitable foraging habitat within 10 miles of the project site. This analysis does not take into consideration that there are multiple Swainson's hawk and White-tailed kite nests documented in the immediate area. The American River Parkway, including Sutter's Landing Park and the project area, provide valuable foraging and nesting opportunities. The area functions as a viable wildlife corridor important to mobile species such as these raptors and other species. The analysis provided in the DEIR is flawed. The fact that there is limited suitable foraging habitat within 5 miles of the project site actually increases the value of what is present including at the project site. Further reduction of such habitat as would result from the proposed project threatens the continued nesting of raptor species in this area and the Parkway.

The DEIR indicates that the project site is not part of a regional wildlife corridor. This statement is certainly inaccurate for mobile species such as sensitive raptor species which are seen to move between the project area, Sutter's Landing Park and other areas of the Parkway on a daily basis. The value of the project area as a corridor for other wildlife species is likely under estimated by the biological consultant for the project. There are open space and structures in place that connect the project area with Sutter's Landing Park and the Parkway. These bridges are commonly used for movement between these areas. Open space such as this on the south side of the American River Parkway is particularly important in regards to serving as a corridor for wildlife. There is less available open space and habitat available for this purpose on the south side of the parkway. A study across several seasons or years would be required to accurately measure the value of the project area as a wildlife corridor which it functions as now.

The claim that existing conditions serve as a barrier to wildlife is not adequately documented. Are there increased road kills, carcasses, or other observations that support this conclusion? Further study is needed or it must be assumed that corridor function exists and mitigation should include enhancement of these values on adjacent

Sutter's Landing Park. This is consistent with observations made by those who spend time there. Tree mitigation planting underway at the triangle parcel to the north of the project site will increase the use and effectiveness of this corridor.

The long-term vision for Sutter's Landing Park includes preserving and restoring habitat and natural resource values. Restoration and enhancement could be done in such a way to increase the values provided for wildlife at the project site and surrounding area. Maintaining the existing values is an important and necessary step to implement this vision. The DEIR does not discuss this vision or any options to help implement it.

It is well known and documented that the project area was previously part of the American River floodplain and flooded regularly including in recent years. The DEIR doesn't adequately discuss how these conditions have been modified by previous activities.

The DEIR estimates the project would impact approximately 50 acres of foraging habitat on and off site for sensitive raptor species. This is a significant impact To Sutter's Landing Park and the American River Parkway which also provide foraging habitat for these sensitive species. Potential significant impacts are also identified for other sensitive species. Proposed off-site mitigation would not be adequate or fully mitigate for impacts to these species or areas. These impacts would also occur at Sutter's Landing Park and within the Parkway. Mitigation for such impacts must occur so that these areas are not impacted and include restoration and enhancement at each location. There are options to improve habitat conditions by relocating existing structures at Sutter's Landing Park as well as securing and restoring habitat on lands immediately adjacent to the park. This also fits with the long-term vision for Sutter's Landing Park and the Parkway. Any off-site mitigation should be secondary only and used to buffer from the impacts in the Park and Parkway from increased recreation and disturbance by those residing at the project site later. Long term monitoring and oversight will be necessary to ensure the success of mitigation at the Park.

The DEIR indicates that the heavily disturbed nature of the project site makes it unlikely that the project would contribute to a cumulative impact to common wildlife species. This does not take into account that residents would likely increase recreation and disturbance activities at Sutter's Landing Park and the Parkway. What about increased human activities in adjacent high-value wildlife areas including the Parkway? These would include direct and indirect impacts and reduction of available habitat and nesting success among other things as well as pets kept by McKinley Village residents or released as feral animals—cat, dogs, etc. that kill wildlife—which will add to the threats to wildlife along the Parkway. Disturbances are increasing now due to the popularity of accessing the parkway via Sutter's Landing Park. This is well documented in reports submitted to City and Parkway staff. The proposed project would be expected to increase such incidents.

Sutter's Landing Park supports an incredible diversity of wildlife species. Documentation of this diversity can be found on the [Friends of the River Banks website](#). This

information includes observations made at and adjacent to the proposed project site. A recent example of the interest in viewing wildlife at this location can be seen on this record of the FORB annual New Years Day 2014 event which included observations of a peregrine falcon and coyote as well as other species. Both peregrines and coyotes are known to make use of the area around the park including the proposed project area. The Sutter's Landing Park area is included in the annual American River Natural History Association wildlife count and often records species little seen in other parts of the parkway. The diversity of habitats present on the Park, adjacent Parkway and other open space such as the project site all contribute to these observations. Any impacts to the existing habitat and open space must be fully mitigated within this same area to preserve wildlife diversity and sensitive species.

The DEIR indicates that approximately 20,000 cubic yards of stockpiled soils were removed from the project site and that sampling detected dieldrin. After recommendations to do so, the soils were apparently removed from the site but there is no indication as to the source of these soils or where the stockpile was relocated. Additional sampling on site showed more soil to be contaminated with dieldrin which was later relocated but no location or adequate explanation is given for the presence of this contamination on site.

The DEIR notes that the CPUC has requested vandal-resistant signs and fencing be required along the southern boundary of the site. Similar measures have been in place for some time along the landfill at Sutter's Landing Park but the fence is cut in many places and there are frequent signs of trespass and disturbance. How will this be any different for the measures to be taken by the proposed development project?

The DEIR indicates that a roadway extending east from the intersection of 28th and A Street is "contemplated in the 2030 General Plan as part of the Sutter's Landing Parkway Interchange, and in the Sutter's Landing Park Master Plan. Public meetings on this subject have included elected officials stating that this interchange is no longer likely and it will be dropped from the General Plan. Likewise, the master plan for Sutter's Landing Park is out of date and needs revision before further development proceeds. Previous identification of a road across the landfill is not consistent with the current vision for enhancing and restoring natural resource values there. An update to the master plan is needed before it is assumed that a road across the landfill is appropriate for the park.

City-owned land at the southwestern edge of the proposed project has been identified as the site for possible storm detention. This land was identified previously as part of Sutter's Landing Park which it is directly connected with. Long-term decisions regarding this City-owned land should be considered in a revision to the master plan for Sutter's Landing Park. These lands also have the potential to be enhanced as part of the restoration of the Park in the future. Any loss of these lands is a lost opportunity and impacts the future of the Park. In earlier public meetings it was stated by City staff that these lands would serve to handle drainage for the proposed project. Questions were raised by the public about how decisions were made regarding these City lands. Now

the DEIR states that this would be a separate project and that the proposed development would handle all drainage on site. The potential use of City lands for storm detention still appears to be linked to the proposed project and impacts from constructing such infrastructure here must be considered in the DEIR. To do otherwise, would be segmenting the project and not considering all potential environmental impacts associated with it.

The DEIR indicates that wildlife in the area have adapted to an urban environment including noise from traffic, airplanes, and trains. This statement is not adequate for sensitive wildlife species or particular activities such as nesting that may be disturbed or destroyed during temporary or ongoing activities associated with the proposed project. Further discussion and consideration is needed. Construction-related noise ordinance exemptions need to consider such potential issues too.

The DEIR doesn't discuss impacts to Sutter's Landing Park public services and recreation although comments and questions were submitted on this subject during the NOP. On page 4.7-11 the statement regarding Sutter's Landing Park is inaccurate or poorly written. It is unclear.

The DEIR discussion on potential impacts to parks emphasizes new activities resulting from development. What about direct and indirect impacts to existing park values? The loss of passive recreation activities including wildlife viewing, photography and related activities would be impacted by the project as proposed. There is no discussion of the loss of existing habitat/open space that provides value to Sutter's Landing Park. The A Street construction and drainage features on the City-owned portion of the project parcel would result in losses to the Park and Parkway and must be mitigated on-site and in advance.

The proposed project currently includes dedication of 2.4 acres of parkland which is less than currently required by the city. The use of fee payment to the City is not adequate, unless the fee is increased and used specifically for Sutter's Landing Park. As described now the fees and land provided would not fully mitigate for impacts to existing park values let alone for the new demands that would be put on them due to the project.

The DEIR does not discuss the need to update the existing master plan for Sutter's Landing Park and factor the new impacts from the proposed project into it.

The DEIR discussion regarding water to serve the project is not adequate for the current severe drought situation facing the city of Sacramento. Updated information and attention must be paid to this detail including impact of in-stream natural resources that would be impacted by further reduction to scarce water in the American River. Extremely severe drought conditions are more likely than that stated in the DEIR. The City's Climate Action Plan predicts that there may be more drought and flooding in the future due to climate change, which needs to be more adequately addressed in relation to the proposed project. The information provided in the DEIR is incomplete and inadequate.

The DEIR indicates that potential impacts to wildlife in the area associated with an increase in lighting was not evaluated due to the urbanized environment that does not contain any federal or state protected wildlife species except for potentially Valley Elderberry Longhorn Beetle. This is incorrect and provides inadequate analysis. This statement does not address the confirmed presence of Swainson's hawks, White-tailed Kites and other raptors that forage on site and are known to nest nearby.

The DEIR states that the public would not have access to the portion of Sutter's Landing Park immediately north of the freeway (the mound) until after 2027. The public can and often does view these areas of the park now including passive wildlife viewing, open space and other recreation values. I and many others do so now on a daily basis.

The DEIR states that the site supports non-native vegetation. The landscape screening plan proposes to use redwood trees which are not native to the area are shown rather than using appropriate local native tree species. This should be changed to use local vegetation consistent with the Parkway and the vision for Sutter's Landing Park.

The project as proposed is expected to generate 1800 vehicles daily exiting A Street through Sutter's Landing Park. This would pose safety issues for Park users and the Park is not now ADA compliant. The steep grade leaving the Park on 28th compounds this problem.

There were no studies of westbound traffic using F and G Streets which is a likely scenario given existing conditions. Therefore, it is not possible to understand the impacts that would result. Traffic impacts to C Street have not been adequately studied. There is much pedestrian, bike, and similar movement along C Street that would be exposed to increased risk from project traffic.

Cumulative analysis for the project includes assumptions about potential roadway improvements in the study area that are not likely now. These include a Sutter's Landing Parkway which would be incompatible with existing uses and long-term vision for the Park and surrounding area. The same is true for a Capital City Freeway/Sutter's Landing Parkway Interchange. Recent statements by public officials indicate that these are not likely viable transportation projects and are likely to be dropped from consideration. The discussion of cumulative plus project conditions for the "without Sutter's Landing Parkway or Interchange" is unclear and appears to be incomplete in the DEIR.

The NOP for this DEIR includes over 1000 pages of materials mostly received as comments and questions regarding the project. The DEIR does not adequately describe or document the range and breadth of comments received. These include a number of comments regarding potential impacts to biological resources that were not addressed in the DEIR. This was certainly a substantial input by the public and more attention and response is needed in the DEIR.

There are possibly missing appendices identified in the Biological Resources Assessment report. All material needs to be included and available for review and comment which may not be currently possible. There is commonly a backlog in CNDDDB observations. The consultant should contact CDFW to find out how that would affect the information reviewed for this project.

There is ongoing local research regarding Purple Martins by Dan Airola and others. It is not clear whether or not the consultant considered this information as part of the project evaluation. It was noted that suitable habitat is present for Purple Martins within the project area but a single site visit could easily miss the occurrence of this mobile species. Further documentation or coordination and consideration are needed.

The project footprint doesn't include City-owned lands on the west end of the parcel but it should given that construction on these lands is being proposed. This area will be the primary access for construction operations and would be impacted by modifications to the A Street Bridge. The same is true for the other side of the A Street Bridge on the landfill within Sutter's Landing Park. In addition, there was a fire on the cCity-owned area on the project site during 2013. None of this information is adequately considered in the DEIR or biological evaluation.

In conclusion, the DEIR for the proposed project has not done an adequate job of identifying existing values at Sutter's Landing Park or taking actions to avoid unnecessary impacts and fully mitigating the Park and its natural resources when this is deemed not possible. As proposed, the McKinley Village project would have significant impacts to Sutter's Landing Park and the Parkway. These include both temporary and long-term impacts to sensitive wildlife species including nesting and foraging habitat, and open space that provides corridor for their movement throughout the Parkway. The enjoyment and recreation the public receives from these natural resources would also be impacted and not adequately mitigated by the proposed project. Requiring a transportation solution for the project that does not include access across Sutter's Landing Park via 28th Street is the best way to avoid unnecessary impacts to the Park.

The City should require the following as required conditions of approval for this project:

- All direct or indirect impacts to Sutter's Landing Park must be fully mitigated so as to restore and enhance Park values. This can include removal of existing infrastructure and development elsewhere within the Park or by adding additional lands with funding to restore and enhance and monitor natural resource values. Requiring a transportation solution for the project that does not include access across Sutter's Landing Park via 28th Street is the best way to avoid unnecessary impacts to the Park.
- The loss of foraging habitat for sensitive species on the project site also impacts those wildlife species and natural resource values at Sutter's Landing Park and the American River Parkway. Mitigation for these impacts must benefit the Park, not off-site locations.

- The loss of open space/habitat on the project site would impact the mobility of wildlife species at Sutter's Landing Park and the American River Parkway. Mitigation for these impacts must directly benefit the Park and Parkway, not off-site locations.
- Recirculate the DEIR to address inadequate consideration and mitigation of significant impacts to Sutter's Landing Park and the Parkway's natural and recreational resource values as well as potentially significant impacts on the Park and Parkway from cumulative development already approved or being considered.

Thank you for the opportunity to comment on the DEIR for the proposed McKinley Village Project.

Sincerely,

A handwritten signature in black ink that reads "Dale T. Steele". The signature is written in a cursive style with a large initial "D".

Dale T. Steele
301 27th Street,
Sacramento, Ca 95816

Dana Allen

From: Kate Lenox <klenox@earthlink.net>
Sent: Tuesday, January 07, 2014 3:04 PM
To: Dana Allen
Subject: McKinley Village draft EIR comments
Attachments: McKinley VillageDraft EIR Comments addendum 010714.pdf

January 7, 2014

Draft EIR for McKinley Village

I would like to post further comments on the Draft EIR for McKinley Village. These concern the traffic study. My previous comments focused on through traffic through the neighborhood to reach the commercial corridors on H St. , J St. and Folsom Blvd. These comments concern traffic on Elvas through the H St./56th St. intersection.

The area Elvas Blvd. goes through is almost completely residential. Because the streets are wide and in some cases two lanes, drivers tend to speed above the posted limit. Most residents on Elvas have to back out into traffic. More cars on the street will make this more problematic. It will also create quality of life impacts for those residents. Traffic study should go beyond the level of service for drivers using the roads and include the effect the traffic has on residential areas goes through.

In addition, at the transition from C St. to Elvas near Lanatt, there are a series of curves. These make visibility entering and exiting the intersections near there more difficult. Visibility of oncoming westbound traffic is poor at Meister turning onto C St./Elvas. Visibility of oncoming traffic is also poor in both directions at the intersections of Elvas and Lupine and at Elvas and 36th Way. At the intersection of Elvas and C St. (segment 32) southbound traffic on Elvas approaches C St. around a curve and up a hill. It's very difficult for drivers at the stop sign on C St. to see approaching southbound cars. I speak from personal experience as I live on C St. Given that the traffic volume would increase a stop sign might be necessary at that intersection to prevent accidents.

The increase in volume of traffic on Elvas should require the study of the H St. Elvas Blvd/56th St. intersection. No study was made of this intersection which handles quite a bit of traffic through the neighborhood. This seems to be a glaring omission that should be rectified in the final EIR.

Please consider these comments in the final McKinley Village EIR.

Thank you,

Kate Lenox
4823 C ST.
Sacramento 95819

Dana Allen

From: Kate Lenox <klenox@earthlink.net>
Sent: Friday, November 22, 2013 1:36 PM
To: Dana Allen
Subject: Comments son the McKinley Village draft EIR
Attachments: McKinley Village Draft EIR comments 112213.pdf

Nov. 22, 2013

McKinley Village Draft EIR Comments

I'm a graduate of the City Planning Academy. I don't believe that McKinley Village fits the city's definition of smart growth. It is not a mixed use neighborhood. Nor does it have access to public transportation. It is essentially a bedroom community dropped into the city. It will be car oriented not walk/bike oriented. That will not just be because of the limited access to and from the site. It's because the railroad levee tunnel access on either end of the project will create a psychological barrier as well as a physical barrier that will make it uncomfortable for residents to walk to neighborhood destinations like Compton's and Theodore Judah School.

I believe that the development should have an affordable housing component. This exists in the neighborhoods of Meister Terrace and Coloma Terrace. There are duplexes and small apartment complexes scattered throughout the area. If McKinley Village wants to emulate the existing neighborhoods it should include similar housing for low income residents. My children should be able to rent housing in the neighborhood they grew up in, even if they may not be able to afford to purchase a home.

I'm commenting specifically on the Transportation and Traffic study portion of the draft EIR. **I find that the study ignores a great deal of the potential traffic problems that may occur if McKinley Village is built out.**

Those conducting the study only examined potential traffic on neighborhood streets from C Street/Elvas through to McKinley Blvd. They seem to believe that the only neighborhood destinations that new residents will be driving to are Compton's and Theodore Judah Elementary. **They made the assumption that no one would drive through neighborhood streets to reach the commercial corridors of H St., J St. and Folsom Blvd. between Alhambra Blvd. and Elvas Ave.**

This is very short sighted and ignores human behavior. The developer has made much of the fact that the "Village" will be a part of East Sacramento. **So why does the study seem to think that they won't patronize local businesses on these streets? They undoubtedly will and they won't drive all the way around the neighborhood to get to them. Neighbors use the streets that will take them on the shortest route. It's human nature to take the shortest distance between two points.**

Because the grid breaks down in the Meister Terrace-Coloma Terrace neighborhoods, very few streets go all the way through from McKinley to Folsom. There are streets that dead end or jog and don't run straight through. **Therefore the few streets that do go through to the commercial corridors will be impacted by new car trips generated by McKinley Village. 39th Street from C Street to Folsom Blvd. , 41st Street from McKinley to H Street, 45th Street from Elvas to J Street and Coloma Way from Elvas to J Street are the only streets through the neighborhood. They will see more traffic. Two of these streets already have speed bumps because they are used by residents to drive through. 39th Street has bumps from C to McKinley, 45th Street has bumps between H street and D Street.**

More car trips generated by the development will mean that all these streets will be used more heavily. City staff should study this and include it in the final EIR.

Thanks, Kate Lenox,
4823 C St. Sacramento, 95819

December 25, 2013

Dana Allen, Associate Planner (dallen@cityofsacramento.org)
City of Sacramento, Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, California 95811

Re: McKinley Village Project (P08-806)
Draft Environmental Impact Report
State Clearinghouse Number: SCH 2008082049

Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Report (EIR). I was troubled to read that that EIR concluded that McKinley Village would have no significant impacts after mitigation in multiple important domains. Based on the pro-project tone of the document, I believe the entire document should be peer reviewed by specialists that have no political ties to Sacramento. The peer review findings should be available to the public and decision-makers before the EIR is considered for certification.

To begin, the EIR contains an assumption of 2 persons per unit with no basis of how this determination was derived. Per the California Department of Finance, the City of Sacramento has 2.66 persons per unit (1/1/2013). Not only does this assumption fall below the current average for Sacramento (which boasts a wide variety of housing units including studio and single bedroom apartments to smaller homes), this project proposes only 3-5 bedroom units, with an option to add a second unit over the garage. Clearly the 2 persons/unit grossly underestimates the project impacts. This underestimation affects multiple public service usage/demand impact assumptions including but not limited to water, sewer, storm drainage, fire, police, traffic and air quality impacts.

In regard to traffic, the underestimation based on persons per unit could significantly affect the degree of impact to current neighborhoods, especially in light of the limited access. I have multiple concerns in this domain. First, several intersections and streets were excluded in assessing the significance of impact. Second, the degree to which a street may support a given level of service does not necessarily reflect the impact on a given neighborhood. Not only are there gross underestimations in number of vehicles to accommodate the project, but the EIR also appears to arbitrarily divide the traffic between routes. Given the freeway access and access to proximity to commercial would anticipate that traffic would be much more concentrated near the 28th and E St area than currently mapped. In regards to "mitigation," the EIR includes *recommendations* that should be included as *mitigations* subject to annual mitigation monitoring. For example, currently Sutter's Landing is effectively a dead end and it is accessed for river access, bicycle trail access, the dog parks or the skate board park. There is limited use for former land fill monitoring. It is not a thoroughfare that it would become with the project. The EIR recognizes the gap of sidewalks and bike lanes near and within the railroad rights-of-way and yet it only *recommends* off-site improves to the pedestrian and bicycle facilities. This safety issue is a significant impact for the many cyclists and pedestrians,

including children and pets, that currently use this road for access to the dog park, skate park, and river access. Moreover, the project claims to promote alternative transportation measures for future residents of the project. Not only would a lack of mitigation make crossing unsafe for current residents, it would also limit potential transportation "alternatives" for future project residents. The EIR should recognize the potential significant impact of the project impacts to include improvements as a mitigation measure. Given the traffic impacts of the project, the Traffic study should also be peer reviewed for its travel assumptions and forecasted residential count.

The report also cited no environmental impacts after "mitigation." Chapter 4.4 HAZARDS AND PUBLIC SAFETY specifically mentioned utilizing a report from the proponent, and I question how many of the reports/studies were supplied by the proponent instead of being prepared by an objective specialist who was not receiving payment directly by the developer. Some examples of troubling assessments include the following: The EIR references a 2007 study of soil samples documenting lead "in excess of the residential California Human Health Screening Levels (CHHSLs) of 80 mg/kg, established by the California Department of Toxic Substances Control." Nevertheless, the EIR later includes a Phase I ESA study prepared by the *applicant* of *only four* soil samples taken 6 inches below the surface. The EIR concludes that lead concentration impacts from adjacent freeway are NOT in excess of the residential "CHHSL" as per the project proponent's environmental consultant. I am concerned that there was indeed evidence of excess lead in the more robust initial studies. Second, the proponent's study results are not only less robust than the initial studies, but I also question the scientific justification for ignoring the surface lead levels in favor of samples from 6 inches under. Finally, that the report ultimately concludes a lack of significant impact based on the proponents study results despite evidence to the contrary from an independent analysis raises concerns about the bias of the EIR document. I believe the entire section should be peer reviewed by an environmental firm that has no political ties to Sacramento. These peer review findings should be available to the public and decision-makers before the EIR is considered for certification.

In addition, as "the project area was not assigned a specific land use and relied on growth forecasting" the cumulative impact section should include a more in depth discussion about the General Plan Amendment impacts of increased service demands (based on factual population estimates) to provide more residential land than what the 2030 General Plan accounts for and for the conversion of an industrial (employment) land use. In other words, the growth forecasting of residential units was never included in the Housing Element for this site. A case in point, the EIR states that the City has a level of service goal of 2.5 police staff at 1,000 persons and the City currently has 1.34 police staff per 1,000 persons. The impacts of additional residents, *above and beyond* the General Plan assumptions, should be viewed as a significant impact and appropriate annual funding to mitigate this impact should be included in the document.

Finally, the preparers of the EIR frame McKinley Village as an ideal vacant lot ripe for residential development. The project is also misrepresented as an "in-fill" development that is touted as providing regional benefits of varied housing opportunities near employment. With this so-called "in-fill" determination, the proponents are exempted from providing affordable housing. The loss of affordable housing is potentially significant and should be properly evaluated. Instead, this

site should be treated like new development in a new growth area. The area should not be categorized as an “*in-fill* development” given its non-existent infrastructure:

- No existing roadway network
- Roadway access requires off-site improvements/approvals
- No existing sewer
- Sewer services requires off-site improvements/approvals
- No existing water
- Water services requires off-site improvements/approvals
- No existing storm drainage or telecommunications
- Storm drainage and telecommunications require off-site improvements/approvals

The EIR also touts the broad housing mix. According to the diagrams, all 328 units are two-story units with a minimum of three bedrooms and up to five bedrooms – with the option of a second unit over the garage. Development of exclusively two-story single-family homes is certainly not a broad mix. The development does not serve elderly persons or residents that wish to age in place, nor does it provide handicapped persons the ease of a unit without installing require expensive retrofits to access a second floor. Again, there is no “required” affordable housing units due to the so-called in-fill status; the only hope for affordability is that some may wish to build second units on the second floor and rent the unit at affordable prices. The second (granny) units will not be handicap accessible without major retrofits or marketable for the elderly. The EIR should contain an objective discussion about the consistency of the City of Sacramento 2030 General Plan and policies and craft appropriate mitigation measures to address this housing mix and affordability deficiency.

As mentioned above, the pro-project EIR which concludes that there would be no significant impacts whatsoever after minimal mitigation measures, does not seem objective. Other paradoxes or oversights which support this include the following:

- The project is described as maximizing solar access (i.e., for generating electricity) and yet it has a “robust tree plan” of conifers and deciduous trees. It is unclear how solar energy production and the urban forest will both be achieved, but it sounds good if you don’t question the end result. Although it is hard to imagine robust tree plan with 3’ side yards, 7-8’ front yards and 5’ rear yards, it is easy to imagine problems with sidewalks and foundations being lifted, and water and/or sewer pipes being impacted by the future growth of the roots of a robust tree plan. The EIR should identify the potential significant impact of tree uprooting as a safety concern and include specific root barrier planting requirements.
- The EIR mentions having operable windows for energy efficient environmental control on one hand and also concludes that the significant noise impacts for lots 1-80 (due to the Capital Freeway require noise attenuation) require specialized windows which must remain closed, on the other hand.
- The project requires the construction of 13-18.5’ high walls for noise attention. The visual impact of the future residents viewing a walled neighborhood within a bowl should also be assessed. The project renderings did not show that perspective and should be provided in the document.

- The EIR dismisses the loss of Farmland of Local Importance status without seeking mitigation of any form. Since the City cannot limit the conversion of farmland outside of the City, which the EIR claims it is encouraging by approving this project, it can require mitigation in the form of purchasing open space easements or paying into a farmland trust. That is appropriate mitigation for loss of Farmland status.
- The EIR includes notifying future residents of odor and other landfill nuisances as mitigation. Notifying someone of a nuisance doesn't eliminate/mitigate the nuisance, it only provides a notice. Instead, the EIR should recognize this issue as a significant and unavoidable impact.
- The EIR doesn't describe the outcome if off-site improvements for water and waste water force mains aren't approved as currently proposed.
- The EIR includes Alternative 4 which has equal or higher impacts than the proposed project which serves no meaningful purpose.
- The EIR should have included another alternative recognizing the current zoning and General Plan designation. In addition, one alternative should have been developed that would only require a driveway from A Street.
- The EIR should contain a mitigation measure that phases project improvements so air quality impacts are occurring sequentially under the threshold (and not simultaneously exceeding the threshold) if that can be practically achieved. Otherwise, if No_x emissions with mitigation exceed 85 pounds a day, the impact should be considered significant and unavoidable as the impact is not truly mitigated by payment of an off-site mitigation fee.

I would like to add for the record that completion of this residential project as currently planned would NOT be an enhancement to Sacramento for the following reasons:

- Limited access dramatically changes the nature of the surrounding neighborhoods in terms of increasing local traffic.
- Project area is subject to flooding, and accordingly the project will put more people in risk. This additional risk adds more responsibility to City staff to address in an emergency.
- Locating future residents next to the railroad where they are exposed to vibrations reflects the poor quality of this project.
- Modifying A Street to provide access to the site will require City staff demands to secure the former land-fill facility. (The former land-fill facility is currently not assessable to the public.)
- The tunnel access is an attractive nuisance and is neither pedestrian, nor bicycle friendly.
- Students will not be within walking distance to their schools.
- The project area contains detectable methane from the former landfill.
- The project is directly adjacent to a railroad and there is always a risk of exposure of hazardous materials from a rail accident.
- The project opens another hole in a secondary flood control structure and puts East Sacramento residents at risk of flooding.

- Residents will essential live within a walled perimeter, be surrounded by two-story structures with minimal yards, and served by park acreage below Quimby standards of 5 acres/1000 persons.
- Relocated land fill monitoring wells and storm drainage areas are included within the park sites.
- Residents will be exposed to freeway related air quality impacts and risk future health problems.

I would like to reiterate the importance of addressing population underestimates, and utilizing independent peer review for important domains such as environmental and traffic impacts. Again, these findings should be available to the public and decision-makers before the EIR is considered for certification. Also, there are important areas of mitigation to address such as pedestrian and cyclist access at 28th street, traffic impacts and potential new access sites (or decreased density), and environmental concerns. Finally, the project should contribute to the surrounding community (e.g. a private park for McKinley Village residents only is not consistent with the "character" of the surrounding neighborhoods; small green spaces doubling as outlets for methane gas or storm mater detention certainly does not add to the community in any meaningful way). And without important mitigations as mentioned above, the project would only serve to detract from the current character of surrounding neighborhoods with increased traffic, decreased walkability and/or safety impacts, and increased in noise and air pollution, to name a few.

Finally, I would like to add that I am not altogether opposed to development of this property. However, there are a myriad of problems with this particular proposal as outlined above. If this project was a good candidate for residential development, the City should have zoned it for that use years ago. If it were to go forward without much more extensive mitigations, it would be a disservice to the community. Thank you for the opportunity to comment on the EIR and the merits of the project.

Sincerely,

Nicole Pardo

January 10, 2013

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
dallen@cityofsacramento.org

**RE: McKinley Village Project (P08-806) Draft Environmental Impact Report State Clearinghouse
Number: SCH 2008082049**

Dear Ms. Allen:

I am a resident of Sacramento at 621 28th St. While I generally favor responsible infill development over suburban sprawl, I have serious concerns about the proposed McKinley Village development. This "orphan" parcel is located "cheek by jowl" to the former City landfill which has experienced known and recurring methane gas migration issues. Currently the landfill gases present an acceptable risk since the parcel is vacant and it provides a buffer to adjacent developed area. The Draft EIR documents that as recently as 2008; a fire north of the American River (see p. 4.4.16 paragraph 3) jumped back across the American River and damaged the Methane Gas Extraction piping. Had this occurred at the site with 328 residential units occupied by more than 600 residents, the results could have impacted public safety.


Intensive urban development in the immediate proximity of a former landfill which requires a 24-7 landfill gas collection system to control gas migration presents an unacceptable risk. I believe the full extent of the potential landfill gas migration risk has been inadequately evaluated in the Draft EIR, as well as the supporting technical analyses and monitoring studies.

Further, one of the two access routes to the parcel requires crossing the heavily utilized at-grade Union Pacific railroad crossing at 28th St. It is clear that as proposed, the project does not provide adequate access to this site in the absence of a third access route along Alhambra Blvd. I believe that the consideration and analysis of an Alhambra Blvd. tunnel access was inadequate.

Unfortunately, this site is squeezed between a rock (the landfill to the north) and a hard place (UPRR railroad to the south) and isn't really an ideal location for a major residential infill project.

My detailed comments are attached.

Sincerely



Thomas F. Quasebarth
621 28th St
Sacramento, CA 95816

Chapter 2 Project Description

- p. 2-10. The draft EIR states that Caltrans performed a structural review of “A” Street Bridge in March 2011. The results of the structural review should be included as an Appendix. The Caltrans Maintenance and Investigations database indicates this bridge was built in 1954 and is therefore 60-years old. The bridge is rated as “structurally obsolete.” The reasons for this designation should be defined and evaluated. The Transportation for America report entitled “*The Fix We’re In The State of Our Nation’s Bridges 2013*” <http://t4america.org/docs/bridgereport/bridgereport-national.pdf> notes that the average service life of a bridge is 50 years and the structurally deficient bridges are 65 years old on average. The Draft EIR should consider likelihood of the “A” Street Bridge becoming structurally deficient in the next several years should be evaluated with estimated costs for repairs and resultant impacts on residents of McKinley Village. There is a high likelihood that major repairs (either routine or emergency) will result in shutdowns to this bridge which could eliminate adequate emergency access to the site for an extended period.
- p. 2-46. The draft EIR summarily dismisses a new bridge structure/roadway underpass at Alhambra Boulevard without adequate analysis. Alternatives for the Alhambra Blvd tunnel should be devised and evaluated and the results should be presented in the environmental documents for public review. In general the Alhambra Blvd tunnel access does not appear to have received serious consideration and there was no supporting technical study or documentation provided in the Draft EIR materials.

The McKinley Village website does provide a brief 2-page summary entitled “*The Facts about a Roadway Crossing of the Union Pacific Railroad Tracks at Alhambra Boulevard*” <http://mckinleyvillage.com/pdfs/AlhambraUPUnderpass.pdf>. This brief analysis, which was not included in the draft EIR, presents an estimated cost of \$28.4M for the Alhambra Blvd. tunnel without any backup or itemization. The Draft EIR should include feasibility and cost information with necessary supporting studies and analysis in order to credibly evaluate the Alhambra Blvd. tunnel alternative

The City of Dixon performed a similar alternative analysis of a grade separation of the existing Union Pacific Railroad (UPRR) tracks and existing Porter Road which passed through UPRR, Solano County, and City of Dixon rights-of-way (R/W). The Dixon evaluation is available on the following website: http://www.buethcommunications.com/project-websites/parkway-boulevard-railroad-grade/docs/ATT8-Tunnel%20Alternative%20Assessment_Final.pdf

The City of Dixon analysis estimated only a \$3-6M cost for the bore & jack roadway tunnel construction approach for a tunnel project with very similar attributes. This is far less than the \$28.4M cited by the McKinley Village project. The basis for the Alhambra Blvd. tunnel cost estimate should be provided and planning level itemized costs should be detailed. In addition,

incremental feasibility and costs for expanding the proposed bike/pedestrian tunnel at Alhambra Blvd. should be included for comparison.

- The draft EIR presents a brief (~1/2 page) summary of four (4) reasons why the Alhambra Tunnel option is considered infeasible. These reasons are copied verbatim in italics below. Detailed comments follow each reason:

1. *“First because the railroad line must be kept in operation, construction of such a structure would require building temporary tracks (“shooflys”) alongside the existing tracks for a distance dictated by railroad design criteria (e.g., acceptable radii). Because of the proximity of Alhambra Boulevard to the Capital City Freeway, this would require the building of a new bridge over the freeway and likely the relocation of the 28th Street crossing to accommodate the shooflys, assuming that Caltrans and UPRR would approve the building of the bridge, and UPRR would approve the crossing relocation.”*

- The use of ‘shooflys’ to construct an Alhambra Blvd roadway underpass is likely the most difficult and expensive construction approach. The analysis should look at the feasibility of other more innovative tunnel construction methods such as ‘bore and jack’ which are likely to be much more cost-effective.
- Alternatives to the “cut and cover”(i.e., shoofly) construction approach should be devised and evaluated. The Draft EIR proposes a *“pedestrian and bike underpass that would be constructed under the existing UPRR raised embankment at the northerly end of Alhambra Boulevard, if approved by UPRR. This underpass must provide a minimum width of 12 feet to accommodate City maintenance vehicles for maintenance activities.”* The Alhambra Blvd. tunnel alternatives analysis should consider the feasibility and incremental costs of expanding the underpass to accommodate traffic.

2. *“Second, due to the grade differentials, and depending on final project design, changes to B Street, the alley, and access to existing homes would result. The roadway underpass would eliminate access from Alhambra Boulevard to B Street (and potentially the B/C Street alley) and to parcels on the south side of the UPRR embankment, as well as likely cause significant utility relocation issues.”*

- These grade differentials should be quantified in detailed analyses of the Alhambra Blvd roadway underpass including schematic plans and profiles. The analysis should consider alternative approaches to the tunnel using either sloped faces or some form of retaining walls. Sloped faces are typically at 2H: 1V and will have a maximum impact on adjacent right-of-way. Retaining walls are typically vertical and could reduce impacts on the adjacent right-of-way.

- The UPRR railroad is at least 15 feet above the ground surface elevation which will limit the depth of excavation that will be required. Estimates of cut should be provided and approaches to minimize the grade differentials should be evaluated.
 - The west side of Alhambra Blvd. between B and C streets is primarily commercial (Extra Space Storage) and there is a vacant parcel between the UPRR embankment just north of Extra Space Storage. The analysis should consider the impact of closing the B/C Street Alley and use of retaining walls along the west side of Alhambra Blvd.
 - Utilities requiring relocation should be identified and their current alignment(s) should be shown on a map. Overhead utilities (power, telephone) can be temporarily supported. Alternatives for underground utility relocations should be analyzed and presented.
3. *Third, the proximity of Alhambra Boulevard to the A Street Bridge/access to the site poses two issues: (1) their proximity would mean that an underpass at Alhambra would not functionally provide a second access to the site for emergency purposes, and (2) their proximity and the grade differential between the Alhambra underpass roadway and A Street would require either construction of a new A Street Bridge over Alhambra Boulevard on the site or the closure of the A Street access.*
- There appears to be approximately 200 feet of separation between the A Street Bridge and the UPRR embankment. The tunnel and extension of Alhambra Blvd. could be curved to the right (east) as is now shown for the bike path alignment. Similarly the A Street extension is currently sharply curved to the left (north). The approximate alignments and separation between A Street and Alhambra Blvd extension should be quantified and shown in schematic maps.
 - Schematic roadway (re)alignments and cross sections should be prepared to demonstrate these alignments and grade differentials.
 - The potential impact of closing, replacing the A Street Bridge, or restricting its use to bicycle and pedestrian should be evaluated since this bridge is 60 years old and has been determined to be functionally obsolete. The remaining useful service life of the A Street Bridge should be evaluated and the impact of its replacement and/or relocation should be considered in the analysis of this site. It is likely that this bridge will need to be replaced or receive substantial structural repairs during the foreseeable future and this will have a significant impact on site access.
4. *Fourth, the extension of Alhambra Boulevard onto the site would be in conflict with the City's potential location of a surge tank to serve its combined sewer system*

- The draft EIR (p. 4.5-29) identifies this as *“one of several possible locations that are being considered by the City for a separate Combined Sewer Detention Project, which could be constructed to mitigate combined sewer surcharging in the CSS within East Sacramento by providing extra storage during peak wet weather flows.*
- The future location of these surge tanks has not been decided and there appears to be some flexibility in determining their location. These surge tanks could be located along the Alhambra Blvd ROW to provide maintenance access. This does not appear to be a major conflict or constraint the tunnel.

Chapter 4

Air Quality

- p. 4.1-24. The draft EIR states that *“The recommendations identified by CARB, including siting residential uses no closer than 500 feet from freeways or other high-traffic roadways, are consistent with those adopted by the State of California for location of new schools. Specifically, the CARB Handbook recommends, “Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day” (CARB 2005).* The proposed site is located between a major freeway (AADT 159,000) and a major railroad line (approximately 20 trains per day) and a rationale should be provided for ignoring the CARB recommendations.
- p. 4.1-6 The Air Quality impact analysis did not include fine particulate matter (PM_{2.5}) emissions even though the Sacramento Valley Basin is in nonattainment classification for state and Federal PM_{2.5} standards (see Table 4.1-6). Other toxic air contaminants are also excluded from the analysis (Ozone). These impacts should be included in the modeling analysis as they may impact public health.

Hazards and Public Safety

The Draft EIR does not adequately describe the post-project risks of methane gas migration from the former 28th Street Landfill. Currently the site serves as a buffer between the 28th landfill and surrounding development. Siting a highly populated urban development along the border of a former landfill with known and recurring methane migration issues presents a major public safety risk which is inadequately addressed in the Draft EIR. Attachment #1 is a checklist of *“Questions To Consider When Reviewing Soil Gas Monitoring Data From Landfills”* prepared by the Agency for Toxic Substances and Disease Registry – Landfill Gas Primer (<http://www.atsdr.cdc.gov/HAC/landfill/html/ch4.html>). This checklist should be completed for all monitoring studies used in evaluating landfill gas impacts to identify and subsequently address monitoring deficiencies.

- p. 4.4-16, paragraph 4. The draft EIR states that *“EKI notes that the lack of detections on the project site could be due to a lack of gas migration in the subsurface from the landfill to the project site or due to gas probe completion to a depth of 2 feet. Soil gas samples collected at less*

than 5 feet bgs are prone to breakthrough of ambient air into the sample, potentially diluting the sample concentration (DTSC 2012).” This suggests the consultants (EKI) had a high level of uncertainty with the adequacy of the monitoring results to properly characterize existing conditions. While this uncertainty may be acceptable under existing conditions since methane gas migration, if any, is being safely vented away since the site is currently vacant. The reliability, representativeness, and accuracy of the methane gas monitoring data collected for the analysis should be re-evaluated and additional monitoring should be conducted pending the results. The “stakes” are much higher relative to landfill gas migration with a planned 348 unit development than a vacant parcel.

The landfill gas monitoring results do not appear to include any QA/QC review or scrutiny. A thorough review of the existing monitoring plans and data collection should be conducted. Of serious concern is the spike of methane concentration which appeared at site E-3 during 2007 (see p. 4.4-13). While this spike was below the LEL, it clearly indicates the potential for methane gas migration into the site. This also clearly indicates that the six (6) gas monitoring locations located along I-80 are inadequate to provide an ‘early warning’ of methane gas migration into the site. Mitigation measures should include consideration of deployment of a tightly-spaced perimeter of gas monitoring “sentinel” sites to protect the residences from methane gas migration.

- The McKinley Village project would significantly impact existing conditions by essentially capping the parcel with high levels of impervious cover (e.g., foundations and streets). This impervious cover would remove any natural methane venting that is occurring from the parcel under existing conditions. The post-project impact of capping the site with impervious surfaces needs to be evaluated relative to methane gas migration from the 28th Landfill. The Agency for Toxic Substances and Disease Registry –Landfill Gas Primer notes that *“It is difficult to predict the distance that landfill gas will travel because so many factors affect its ability to migrate underground; however, travel distances greater than 1,500 feet have been observed. Computer models that use data about the landfill and surrounding soil conditions can predict the approximate migration patterns from existing landfills.”* The spacing of any gas monitoring probes should include both the perimeter of the site and the interior.
- p. 4.4-3 Figure 4.4-1 shows the locations of six (6) landfill gas probes along the northern portion of the site along I-80. While these probes may have been adequate to determine risk of methane migration from the landfill into a vacant parcel, they are inadequate to monitor potential methane migration into a highly developed urban/residential setting. Additional probes locations along I-80 especially in the vicinity of A Street are needed and additional depths need to be monitored. The interior of the site especially along the 28th St side requires additional monitoring locations as well. The monitoring should be conducted using EPA and California Integrated Waste Management Board (CIWMB) approved methods and should be supported by a rigorous Quality Assurance Project Plan (QAPP).

- p. 4.4-10 Sacramento County acting as the Local Enforcement Authority (LEA) inspected the Landfill in July 2013. The Draft EIR states that *“Areas of concern identified by the LEA that were located on the former 28th Street Landfill, which is not within the project site boundary, included several open landfill gas probes with unsecured housing lids and exposed tubing with damaged valves...”* This documented sloppy maintenance of the landfill gas probes is another serious concern especially since the environmental impact analysis relies on monitoring data collected under these poor conditions. The monitoring program may have been considered reasonable and prudent since the parcel was vacant and the risks of property damage or public safety were minimal. However, basing the conclusion of no significant impacts on this data is not acceptable since the methane gas migration would have serious consequences (e.g., 348 units and 600+ residents) under post-project conditions.
- p. 4.4-13 and Figure 4.4-4. The Draft EIR states that *“Methane was detected in only one sample which was at 6,400 ppmv. This sample was collected at location E-3, shown on Figure 4.4-4, Soil Gas Sampling Locations.”* This sample is located approximately 500 feet inside the southeast portion of the site indicating the potential extent of methane migration. RCRA requires that owners and operators of MSW landfills ensure that the concentration of methane gas generated by the facility does not exceed 25% of the lower explosive limit (LEL). This monitoring result presents a serious concern as it indicates that there already is a strong potential for landfill gas migration into the interior of the site. Additional monitoring and study is required especially since the existing network of monitoring sites was inadequate to characterize risk levels for an intensive urban development.
- p. 4.4.16, paragraph 3. The Draft EIR notes that *“Since 2007, one large-scale increase in methane concentrations on the landfill property occurred in September, 2008. This excursion was caused by a fire at the former 28th Street Landfill. The City of Sacramento reported that the fire started on the north side of the American River, jumped the river onto the landfill, and destroyed approximately 16,000 feet of landfill methane gas extraction piping. During this single event, eleven contiguous landfill gas probes located on the landfill site, across the freeway from the project site, registered methane concentration from 5.7% to 44.5%.”* These concentrations are well in excess of the LEL (and the UEL) and could have resulted in serious, if not catastrophic, results had the site been fully developed. While the Draft EIR notes these measurements were across the freeway, this would be only a couple of hundred feet from the proposed residence located along I-80. Moreover, the rapidity and degree (e.g., from non-detect to 44.5%) with which the methane concentrations increased indicates that perpetual, highly vigilant, monitoring and management of the landfill gas system will be required in order to protect public safety. The EIR must clearly document how this impact can be mitigated.
- Grading and excavation activities during construction could significantly alter the soil properties and potentially allow dangerous concentrations of methane to accumulate within the site. The impacts of grading and excavation should be evaluated. In addition, drains, trenches, and buried utility corridors (such as tunnels and pipelines) can act as conduits for methane gas

movement. The EIR must evaluate the impacts of site development (both construction and post construction) on the post-project risk of methane migration from the landfill.

- p. 4.4.24, The "A" St Bridge will provide one of two access routes to the site. The Draft EIR states that *"Based on the Caltrans Bridge Inspection Report, the bridge is structurally sound and has a weight limit of 90 tons (Caltrans 2011).* The Caltrans Structure Maintenance Investigation shows that the "A" St Bridge was constructed in 1954 and is 60 years old. The bridge is rated as *"functionally obsolete."* The Transportation for America report entitled *"The Fix We're In The State of Our Nation's Bridges 2013"* <http://t4america.org/docs/bridgereport/bridgereport-national.pdf> notes that the average service life of a bridge is 50 years and the structurally deficient bridges are 65 years old on average. The likelihood of the "A" Street Bridge becoming structurally deficient in the next several years should be evaluated with estimates costs for repairs. Further, the impact of a protracted bridge closure during construction periods should be evaluated.
- p. 4.4.29. Ammonia was also detected at the 28th landfill site according to the Central Valley RWQCB Waste Discharge Requirements Order #R5-2004-0039 (see Appendix H PDF p. 522). The Draft EIR notes that *"Ammonia is an example of an acutely hazardous material (AHM) that is regulated by the California Office of Emergency Services under the California Accidental Release Program (CalARP)"* The draft EIR needs to include ammonia and other gases (e.g., Hydrogen Sulfide, VOCs) in the analysis of potential Landfill Gas impacts.
- p. 4.4.40. The six gas probes and two monitoring wells are inadequate to provide sufficient protection for the proposed development from landfill gas migration. Furthermore the data previously collected by these probes has been identified as suspect due to the shallow monitoring depths (2.5 ft. bgs) and the potential breakthrough of ambient air thereby diluting the presence of landfill gases. The interior of the site has already seen elevated methane concentrations approaching 25% of the LEL. The conclusion that the impact of methane gas on future resident is less than significant has not been adequately analyzed and supported by sufficient monitoring data.
- p. 4.4.40. The Central Valley RWQCB detected ammonia and other gases at the landfill site. The conclusion that other odors, gases, or dust from the landfill to the site is less than significant impact has not been adequately analyzed and supported by monitoring data.
- p. 4.4.41. The "A" Street access to the site is serviced by a 60-year functionally obsolete bridge and an unimproved road crossing portions of the landfill. The draft EIR concludes that the "A" Street access impacts are potentially contingent on the Local Enforcement Authority (LEA) and the Central Valley RWQCB may be required to make modifications to the Landfill Postclosure Land Use Plan, the Closure/Postclosure Maintenance Plan and the Postclosure Maintenance and Corrective Action Order. While these plans and orders are clearly not the responsibility of the McKinley Village proposed project, an environmental review of must be conducted prior to

project approval. Therefore, it is pre-mature to state that these impacts are less than significant.

- p. 4.4.45. The draft EIR presents a simplistic and biased statistical analysis regarding the risk of railroad derailments based on the length of track (0.75) adjacent to the McKinley Village site. According to the Federal Railroad Administration, *“in an average year in the United States, more than 3,000 train accidents occur leading to death, injury and property damage. National statistics show that every two hours there is a train accident in the USA. Almost all of these accidents involve some type of property damage—and in some cases injury and death. Half of all railroad accidents occur at crossings...”* The draft EIR also ignores other types of train accidents including collisions, highway–rail grade crossing accidents, and other minor accidents that could have an impact by blocking access to the site for protracted periods.

The draft EIR only considers trains carrying “hazardous materials” in the ‘risk’ assessment. In reality, any train derailment would likely result in significant spillage of diesel fuel or other liquid non-hazardous cargo and would present a significant hazard and impact on public safety. The analysis should include assessment of post-accident recovery periods and address whether closure of one of the access routes for a protracted period (e.g. weeks, months) presents an unacceptable risk. The reported frequency of approximately 1 accident in 1,000 years is misleading and not based on standard risk analyses procedures and should be removed from the EIR

The draft EIR should include a standard risk analysis including a “worst case scenario” which might be a derailment of a train blocking both the 40th St access route and the “A” St access route.

Hydrology Water Quality and Drainage

- p. 4.5-3. The description of surface water quality needs to be revised to include discussion of Total Maximum Daily Loads (TMDLs) currently in effect or development including the American River TMDL for methylmercury and central valley TMDLs for organochlorines, pyrethroids and other pesticides. The impacts and mitigation measures for these pollutants need to be included in the project specific impacts and mitigation measures (e.g., controls on application of landscape chemicals, collection of CFL light bulbs [containing mercury]), and other Best Management Practices (BMPs).
- p. 4.5-38. The Low Impact Development (LID) design features are described as being under development and were not analyzed in the draft EIR. The environmental review should be extended to allow review of these project features since they are described as potentially significantly reducing water quality impacts from the site.
- p. 4.5-39. The draft EIR states that *“the proposed project would have a low potential to substantially degrade water quality due to the type of development being proposed, the existing*

drainage characteristics, and implementation the City's SQIP." This is not substantiated but any analysis. The site is located adjacent to a critical receiving water, the American River. Currently the site is vacant and generates very little, if any runoff. Under the post-project conditions, the site will have 60-70% impervious cover and will generate a large amount of stormwater runoff which will be pumped into the American River via Sump 99. Stormwater runoff has been demonstrated to contribute significant pollutant loading of metals, organics, and pesticides.

- p. 4.5-47. Drainage from the site during extreme storm events is dependent on proper operation of two pumping system; one onsite and the other at Sump 99. The impact of failure or upset conditions of the pumps at Sump 99 is described qualitatively in the draft EIR as follows *"rainfall rates in excess of this standard, or failure of the drainage system due to improper maintenance or an accident, could still result in localized flooding within the project site."* These upset conditions should be included in the modeling analysis and quantified rather than dismissed. The need for redundant pumps, or independent power generation systems, or additional detention pond capacity should be evaluated and included in the mitigation measures as necessary. Rainfall rates associated with the 200- and/or 500- year storm events should be analyzed because potential flooding impacts have been identified (due to potential drainage system failures) and the likelihood that climate change will alter the recurrence interval for extreme flooding events.

Appendix J. Master Stormwater Management Plan.

- p.3. The Plan states that *"Since McKinley Village drainage is contained on-site and connected to Sump 99, the pump system was designed to shut off when peak stages occur in Sump 99 in order to minimize any impact to the off-site drainage system. To mitigate the storm water runoff when the pumps are shut off, McKinley Village includes two detention basins to contain peak runoff volume when the pumps are turned off."* In effect, drainage from the site during extreme storm events is dependent on proper operation of two pumping systems; one located onsite and the other at Sump 99. Figures 9A, 9B, and 9C show the pump shut down periods. The plan should describe how this operating rule will be implemented since conditions at Sump 99 have to be communicated back to the site. Will this be done manually or with SCADA telemetry? The impact of failure or upset conditions of the pumps at Sump 99 should be included in the analysis. The need for redundant pumps or fail safe power generation systems should be evaluated.
- p. 5. No model calibration was performed, instead results from the existing City model from 1996 (SSWMM96) were compared to a more hydraulic modeling code (XPSWMM) in order to *"get an overall confidence in the XPSWMM model"*. The Master Drainage Plan should include hydrologic and hydraulic calibration and verification of the model used for the analysis (XPSWMM). As noted by the City of Sacramento SSWMM User's Manual *"calibration or verification of a model is an important step that leads to more trust in the model results."*

- p. 6. Total rainfall depths for the 10- and 100- year storms should be provided in addition to the 5-minute and hourly tabular summaries in Appendix D. Rainfall and runoff volumes should be reported in “inches” to facilitate checking.
- p. 12 and Figures 5.a and 5.b. The comparison of SWMM96 and XPSWMM modeling results show rapidly oscillating flows which range from 60 cfs to negative 20 cfs. The report notes that “*Flow oscillation due to low flows. Pumps turn on/off to discharge low flow.*” An explanation for the occurrence of “negative flows” should be provided. These results should be checked to make sure they are not actually the result of model instabilities or incorrect pump sizing.

Noise and Vibration

- The Draft EIR states that “*The project design includes connecting the residences located adjacent to the UPRR tracks through the creation of an outdoor room with a 16-foot tall wall adjacent to the UPRR right-of-way. These outdoor rooms, shown on Figure 4.6-5*”. Figure 4.6-5 does not depict a 16 –foot wall. How desirable will “outdoor rooms” with 16 foot walls be?
- p. 4.6-49. Not surprisingly the draft EIR does identify potentially significant interior noise impacts at elevated second-floor façades of those residences located adjacent to Capital City Freeway.

Appendix L. Hazardous Material Documentation

PDF pp. 11-70. A quick review of the well water quality data presented in Appendix L finds no QA/QC data (e.g., field duplicates, matrix spike) nor any laboratory data usability review.

Attachment #1

Source: The Agency for Toxic Substances and Disease Registry –Landfill Gas Primer

<http://www.atsdr.cdc.gov/HAC/landfill/html/ch4.html>

Questions To Consider When Reviewing Soil Gas Monitoring Data From Landfills

Gases Selected for Monitoring

- What gases are routinely monitored?
- Do these include the chemicals of concern identified by the community, regulators, and public health officials?
- Do routine reports include oxygen and carbon dioxide when methane levels are reported?
- Do the chemicals selected for monitoring include those expected to be present in the greatest quantities and/ or those that are the most toxic?
- Are there any data gaps in the chemicals selected for monitoring?

Pressure Monitoring

- Are atmospheric (barometric) and well/probe pressures included in routine reports?
- Do any of the soil gas wells/ probes have dedicated pressure gauges?

Sampling Methods

- Were EPA-approved sampling methods selected? If not, why?
- Are the sampling methods the same or comparable to methods recommended by the Solid Waste Association of North America and/ or state regulatory programs such as the one operated by the Missouri Department of Natural Resources (see Appendix E)?
- Are the selected methods recommended for measuring the chemicals selected for monitoring?
- Are water levels within the soil gas well/ probe measured after taking the gas samples?

Sampling Equipment

- Was the sampling equipment designed to operate under the conditions in which it was used?
- Were the manufacturer's limitations on the environments in which the equipment would give accurate readings followed?

Monitor Well Construction and Depth of Screened Intervals

- How far below land surface is the bottom of the boreholes for wells and probes?
- How far below land surface does the well/ probe screen begin and end (top and bottom of screen interval)?
- How does the well/ probe depth and screen interval compare to the top and bottom of buried waste and the top of the groundwater surface (water table)?
- Does the routine or periodic monitoring indicate if the well/probe is dry or partially filled with water?
- Is there a geologic report associated with the well construction report?
- Has there been a geologic analysis to predict and investigate possible subsurface pathways?

Monitoring Locations

- Is there a perimeter monitoring program with adequate spacing between permanent soil gas monitoring wells?
- Are there monitoring wells adjacent to on- site buildings?
- Are there monitoring wells between landfill boundaries and adjacent properties with occupied buildings?
- Are there passive vents on the landfill that are routinely monitored?
- Has a surface sweep survey with handheld instruments been performed to locate "hot spots" at the surface of the landfill that may be the best location for permanent monitoring wells/probes?

Other Sources

- Are there other possible sources of contaminated soil gases such as underground storage tanks, spilled petroleum products, or leaking natural gas pipes?

Monitoring Schedules

- How often are the monitoring wells/ probes sampled (daily, weekly, monthly, quarterly)?
- Are wells adjacent to occupied buildings on the landfill sampled at least monthly?
- How often is sampling performed on gas collection and venting systems?
- If significant levels of NMOCs have been historically reported, has monitoring continued frequently enough to determine historical trends of high and low concentration areas across the landfill or at property boundaries?
- Does the monitoring schedule include provisions for sampling during worst-case climatic periods (e.g., when the surface of the landfill is frozen or

saturated)?

Data Quality Parameters

- What percent of attempted sampling events were successful?
- How accurate were the reported sampling results?
- How precise were the reported sampling results?
- Do oxygen levels in samples approach atmospheric levels, indicating a leaking well casing or faulty sampling equipment?
- What percent of the monitoring wells/probes are either saturated with water or do not provide a consistent methane reading?
- Is there regulatory oversight of sampling team performance?

Dana Allen

From: Antonia Chapralis <paraskaki@sbcglobal.net>
Sent: Sunday, December 29, 2013 12:03 AM
To: Dana Allen
Subject: Proposed McKinley Village

Dear Mr. Allen,

I have some major problems with the proposed McKinley Village but I'd like to address two major issues that were erroneously covered in the draft EIR.

Number one would be TRAFFIC! The traffic study was partially done over the summer months when school traffic at Sutter Middle School and Theodore Judah School is non-existent. It did not cover holiday times when there is more activity and more car trips at the schools. It was also done during construction at Sutter Hospital. During that time, many people like me, I assume, avoided that general area and approached Alhambra Blvd. from Folsom Blvd. In addition, that traffic study was done before J Street and Folsom Blvd. were changed from 4 lanes to two. One only needs to drive on Alhambra, J Street, and Folsom Blvd. during peak hours, for example noon and 5:00, to experience the change in traffic. It has become very congested and slow and will only get much worse with all the extra traffic from the proposed McKinley Village spilling onto our small East Sacramento streets. The result of all of those people driving to work and/or schools from this auto-centric proposed development (with no mass transportation) will be awful.

Number two is the issue of schools! When we moved into the Theodore Judah area many years ago we were sent to Caleb Greenwood school because Judah was impacted. Guess what. . . It still is. Children come from all over the district to attend Sutter and it works. And it's full. That model situation should not be altered to satisfy a developer. Please note that his current EIR was done before Sac. City Unified closed seven schools!

This proposed development is NOT a good idea for many reasons but I've highlighted two major issues that will negatively affect the quality of life in our established Midtown and East Sacramento neighborhoods.

Sincerely,
Antonia D. Chapralis

Dana Allen

From: Antonia Chapralis <paraskaki@sbcglobal.net>
Sent: Monday, November 18, 2013 6:36 PM
To: Dana Allen
Subject: DEIR: proposed Mckinley Village

I'm responding to the DEIR for the proposed McKinley Village:

4.3 The Nisenan Indians should be honored and featured and showcased, not only protected, in this development as they are the core of our local history and heritage.

4.6 The noise study was not done during the State Fair. That's odd!

At the time it was done were any significant activities going on at Cal Expo like horse races, demolition derbies, or rock concerts? I live nearby and when there's an event at Cal Expo and the wind is just right, it sounds like everything is happening down the street!

4.7 The report failed to mention that the schools that the children in this proposed housing development could walk to, namely Theodore Judah and Sutter Middle School, are filled to capacity. It makes no sense whatsoever to make a territory transfer just so that there is less travel time to school when in fact these schools are impacted. SCUSD just closed 7 schools! I think that the numbers on Table 4.7-2 are simply incorrect.

4.9 I also doubt and question the timing of the traffic studies for two reasons:

1. It was done before the calming changes on J St. and Folsom Blvd. were completely implemented.
2. It was done from May through October which encompasses summer vacation. That's odd.

So many people are gone during that time that it skews the report! To really get a good count it should be done from September through December at least, and maybe even from January through Spring.

4.10 The proposed housing does not match nor correspond to East Sac or Midtown. No where

in those two areas are there 3-car garages nor such an onslaught of BIG houses!

With sincere concern,
Antonia Chapralis

Dana Allen

From: Tim Chapralis <tschapralis@sbcglobal.net>
Sent: Sunday, December 29, 2013 1:27 AM
To: Dana Allen
Subject: Proposed "village"

Dear D. Allen,

This is in regards to the proposed McKinley Village.

Why doesn't the developer put in entrances and exits off of the freeway? Because it's too expensive? Too bad! Do not spill all of those extra cars onto the streets of East Sacramento because they just can't handle more traffic. It's bad enough already.

The density of houses per acre does not match the nearby neighborhoods. That along with the proposed low building costs will hurt property values there and in surrounding neighborhoods. East Sacramento has been so great for so long. Please don't destroy it now. Make that parcel of land surrounded by the river, Cal Expo, the train tracks, the freeway, and the former dump, a continuation of the Sutter Landing Park.

Best regards,
Mr. Tim S. Chapralis

Terry Kastanis
1400 41st Street
Sacramento, CA 95819-4041
Phone: ((16) 455-5682, tkastanis@comcast.net).

November 18, 2013

Dana L. Allen, Associate Planner
Environmental Planning Services
Community Development Department
City of Sacramento
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Regarding: ***McKinley Village***

Dear Mr. Allen:

After reviewing the executive summary of the Draft Environmental Impact Report, there is no question in my mind that the CEQA guidelines have not been met and that there will be substantial negative impacts on the environment and these cannot be adequately mitigated if the project is approved. A **"No Project, No Development"** alternative should be adopted.

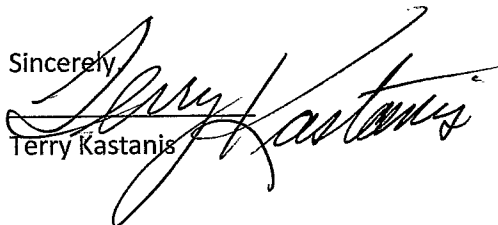
Significant negative impacts will result in poor air quality, noise and vibrations from automobile and train traffic, lack of public transportation, inadequate vehicular circulation and flooding from the combined sewer and storm water drainage if this project is built.

One merely needs to visit the site and observe the lack of access, the noise and air pollution from the automobile and train traffic, and the lack of connectivity to the surrounding neighborhood to realize that the DEIR was written in complete isolation of any physical observations or even a brief visit to the site. In other words, this DEIR is a textbook example of unsubstantiated plethora of technical jargon taken from any boilerplate CEQA document and applied to this project.

The thought of people living, children playing, and humans inhabiting this site as proposed by the developer is unacceptable. McKinley Village as proposed should be denied outright by the City of Sacramento.

Again, I urge the **"No Project, No Development"** alternative in this DEIR for reasons outlined above.

Sincerely,


Terry Kastanis

From: Jil Anderson <djsrdl5@comcast.net>

Date: Friday, December 13, 2013 10:38 AM

To: Bonnie Pannell <bpannell@cityofsacramento.org>, City of Sacramento <dfong@cityofsacramento.org>, "shansen@cityofsacramento.org" <shansen@cityofsacramento.org>, City of Sacramento <jschenirer@cityofsacramento.org>, Kevin McCarty <kmcCarty@cityofsacramento.org>, City of Sacramento <jschenirer@cityofsacramento.org>, Steve Cohn <scohn@cityofsacramento.org>, Allen Warren <AWarren@cityofsacramento.org>, "aashby@cityofsacramento.org" <aashby@cityofsacramento.org>

Subject: McKinley Village

Dear City Council:

We write today to once again address our concerns about the traffic through quiet neighborhoods, created by the McKinley Village project. No study was conducted to show the impact on F and G Streets. While we can appreciate the revenue stream from new property taxes and new residents who will spend money in Midtown, shouldn't the livability of Midtown as it currently exists be given weight in your decision. Because we live on F Street, we know what hazards exist in both parking and attempting to cross F Street during peak traffic hours. My wife has been nearly struck twice on F Street, pulling back as a speeding car did not appear to see her and our pets. There is also an increase in bicycle traffic in Midtown. God bless their initiative in biking to work, but understand more traffic will impact them as well.

We realize City Council is not in charge of how smoothly our Business Loop Freeways (Hwy 50 and 80 Business Loop) operate in terms of traffic flow. That you cannot control. What you can control is the traffic from new cars into Midtown. 1800 car trips per day is a pretty big number considering that the streets through the neighborhoods of Midtown are single lane roads.

We do not have all the answers, and it looks like already the owners are doing their site preparation work under the probable viewpoint their project has a total green light. Please carefully consider your options. . .diverting traffic onto 29 or 30 roads, fewer units, frankly we don't know how you solve this. But we do know this: This project is not like reversing the traffic considerations for K Street and allowing cars. Once those homes are built, you have locked in a traffic situation forever, and most importantly permanently altered the livability of Midtown.

Thank you for your careful consideration,

Sincerely,

Don and Jill Anderson
2619 F Street

Dana Allen

From: Amy <aadeliti@gmail.com>
Sent: Tuesday, December 17, 2013 11:05 AM
To: Dana Allen; Steve Cohn
Subject: letter of concern about the proposed McKinley Village project

To: Dana Allen

Associate Planner, City of Sacramento

dallen@cityofsacramento.org

To: Steve Cohn

Councilmember District 3, City of Sacramento

scohn@cityofsacramento.org

From: Amy Anderson

1321 40th Street, Sacramento

aadeliti@gmail.com

Ms. Allen & Mr. Cohn:

I'm writing to express my opposition to the proposed McKinley Village housing development as designed.

The project is a car-oriented -- not a pedestrian-oriented -- development, and it will bring increased and harmful vehicle traffic to the supporting streets around it. The budding pedestrian nature of existing Midtown and East Sacramento neighborhoods should be valued, not threatened. Any sensible urban planner or architecture student should be well versed in the preciousness of walkable communities, even more so considering how very difficult they are to produce. Long before Jane Jacobs wrote her treatises that inspired New Urbanism, common sense taught people that walkable communities with a mix of commercial, artistic, and residential structures are livable, compelling communities. Adding more cars and requiring residents to drive even further to reach

amenities will severely and irrevocably harm the area. Sacramento should be protecting one of its most valuable resources and expanding upon its recent successes, not endangering it and them.

The streets that would shuttle cars into the McKinley Village development are already over-taxed by cars; additional traffic would make them unpleasant and inhospitable to the types of new businesses and culture that have started to take root in our area. While I love riding my bike instead of driving my car, recent traffic increases have made many nearby roads congested, intimidating, and dangerous, making even simple errands a hassle unless done during the few non-congested times of day. I regularly hear people from tract-house communities in Natomas and West Sacramento express that they wished they lived in an area where they would walk to amenities. I've never heard anyone mention they wanted to live in an area where they could drive more, where they could sit in traffic more, where they could dodge more vehicles, inhale more exhaust, or navigate more parking lots. Your decision on McKinley Village can make the difference between encouraging a budding community and creating yet another block of houses besieged by traffic, isolation, and sterility.

Sacramento is long overdue to shine as the state capitol. It should look to cities that have succeeded in urban transformation -- like Portland, OR and Boulder, CO -- for how to do this. Strategies like reducing car-fed projects, supporting walkable communities with a mix of commercial and residential amenities, funding safe, clean, convenient public transportation -- all of these the items are well known and well proved recipes for urban success, and McKinley Village does absolutely none of them. Instead, it compounds the problem that so often, and so-unnecessarily makes Sacramento lackluster. Our city is blessed with a great climate, easy access to San Francisco, Lake Tahoe, the riches of Napa & Sonoma valleys, and proximity to world-class education in both Davis and Berkeley. We should be doing far better as a city. And we are not, in good part, because tract housing suppresses vitality.

Please help protect our community. Please help Sacramento grow into something that we -- and California -- can be proud of. Please help stop McKinley Village and set the precedent that new development must be quality development.

Amy Anderson

1321 40th Street, Sacramento

Dana Allen

From: KB <quebeen@ymail.com>
Sent: Tuesday, December 17, 2013 9:56 AM
To: Dana Allen
Subject: McKinley Village EIR project question

Hello Dana ~

I understand you are the person to whom I should direct comments on the draft EIR regarding the proposed McKinley Village project.

I would like to know how the project may potentially affect the need/demand for a proposed Richards Boulevard Connector road between the I-5 and Business 80 highways, as I believe is envisioned by the City's General Plan, and how the McKinley Village Project may affect the potential technical or financial feasibility of constructing the connector road.

Thank you.

Kevin Baker
2225 C Street
Sacramento, CA 95816

Dana Allen

From: Tom M <gr8jibe@yahoo.com>
Sent: Tuesday, December 17, 2013 12:08 PM
To: Dana Allen
Cc: Steve Hansen; Tom Buford
Subject: Re: McKinley village - Alhambra tunnel

Hello Dana - Yes , this is my comment on the McKinley Village draft EIR.
I will do a little more research on the cheaper tunnel construction alternative - so I will be prepared for the developers response.
Thanks , Tom Meagher Sacramento

SEE: CITY OF DIXON, DEPARTMENT OF PUBLIC WORKS
PARKWAY BLVD GRADE SEPARATION PROJECT

City Project No. 2003-12
TUNNEL(UNDERPASS) ALTERNATIVE ASSESSMENT
Executive Summary

The extension of Parkway Blvd includes a grade separation of the existing Union Pacific Railroad (UPRR) tracks and of existing Porter Road, passing through UPRR, Solano County, and City of Dixon rights-of-way (R/W). Structure types considered for use at this project location are an overhead and an underpass (tunnel alternative). Based on preliminary investigations, the overhead was selected as the most feasible alternative. However, as a result of comments received during public outreach meetings, the feasibility of a tunnel crossing was further investigated.

Two tunnel construction methods were investigated:

1. Cut-and-cover construction: Cut-and-cover construction consists of building the entire tunnel in place in an open pit while UPRR traffic is detoured along temporary tracks (shooflies) and existing utilities are relocated or temporarily supported.
2. Bore-and-jack construction: Bore-and-jack construction consists of building the tunnel in segments in a pit adjacent the crossing location and jacking the segments into the final configuration under the live UPRR tracks and existing utilities

Tunnel Alternative Assessment
Parkway Boulevard Grade Separation Project
City Project No. 2003-12
PRINTED 11/7/2006 14

PAGE 14:

Jacking beneath the UPRR tracks requires extensive coordination with UPRR, including several plan review periods, which can delay the beginning of construction by ten to eighteen months. However, once construction begins and a reserve of segments is cured, tunnel bore-and-jack operations should proceed at a moderate pace.

Based on discussions with contractors, review of the site conditions, and comparative costs from similar type construction, it is estimated that the tunnel will cost anywhere from \$3,000,000 to \$6,000,000.

From: Dana Allen <DAllen@cityofsacramento.org>
To: Tom M <gr8jibe@yahoo.com>
Cc: Steve Hansen <SHansen@cityofsacramento.org>; Tom Buford <TBuford@cityofsacramento.org>

Sent: Tuesday, December 17, 2013 9:40 AM
Subject: RE: McKinley village - Alhambra tunnel

Hello Tom,

I received your email. We are currently taking comments in writing on the analysis in the Draft EIR for the project. Is this your comment on the EIR? All of the comments are reviewed by the city staff team, consultants, and the applicant team. They will be inserted into the Final EIR with responses to each comment. Please let me know if this is your comment and I will process the comments in accordance with our standard procedures.

Thank you,
Dana

From: Tom M [<mailto:gr8jibe@yahoo.com>]
Sent: Saturday, December 14, 2013 6:29 PM
To: Dana Allen
Cc: Steve Hansen
Subject: Fw: McKinley village - Alhambra tunnel

Please let me know via email if you received this email and exactly how you will follow up with the developers.

Thank you Tom Meagher Sacramento

----- Forwarded Message -----

From: Tom M <gr8jibe@yahoo.com>
To: "SHansen@cityofsacramento.org" <SHansen@cityofsacramento.org>
Sent: Thursday, December 12, 2013 11:35 AM
Subject: McKinley village - Alhambra tunnel

Hello Steve - I attended the Dec 11 meeting but did not get a chance to speak.
As an engineer, I am concerned about the lack of information available to the public.

I heard from many meeting attendees that an Alhambra tunnel would solve a lot of problems.
But the developers say its infeasible and would cost about \$30 million.
City staff believe this number, but I question if this is an honest cost estimate.

The developer claims a cut and cover approach is needed and that a temporary bridge over I-80 is needed to build the tunnel.
A tunnel boring approach would be much cheaper and less disruptive. A similar project in Dixon using boring is estimated at 6 million.

The CSUS pedestrian underpass at Elvas was constructed with out disturbing tracks..in spite of initial protest by UPRR.
If the 40th st tunnel is feasible, why not Alhambra?

Please ask the developer for a study of alternatives of the Alhambra tunnel including a bore and jack approach to the Alhambra tunnel.

Thank you Tom Meagher Sacramento

Hi Ms. Alagozian -

AS PER THE REQUEST BY CITY STAFF @ THE MEETING OF 12/12/13 RE THE MCKINLEY VILLAGE EIR, I AM SUBMITTING MY ^{mitigation proposal} COMMENT IN WRITINGS - SEE THE ATTACHED MAP AND SUGGESTED REALIGNMENT OF ALHAMBRA BLVD AT 'B' STREET.

AT AN EARLIER MEETING RE THE PROPOSED DEVELOPMENT - I POSED THE ~~REALIGNMENT~~ BORING OF A TUNNEL AT ALHAMBRA AS THE MOST PRACTICAL SOLUTION TO PROVIDE A SECOND MEANS OF ACCESS TO THE DEVELOPMENT RATHER THAN THE 'A' STREET BRIDGE. AT THAT TIME MR ANGELIDES (SP) SAID A TUNNEL @ ALHAMBRA WAS PROHIBITIVELY EXPENSE SINCE ALHAMBRA BLVD. WAS TOO CLOSE TO BUSINESS 80 FOR THE PROPER SHORING & SAFETY MEASURES TO BE PUT IN PLACE.

I FEEL THAT A REASONABLE REALIGNMENT OF ALHAMBRA BLVD @ 'B' STREET COULD/WOULD REDUCE THE PROHIBITIVE EXPENSE TO A "REASONABLE EXPENSE" AND ALLOW A TUNNEL TO BE BORED AT ALHAMBRA.

ALHAMBRA IS AN 80' STREET; THE REALIGNED ϕ OF ALHAMBRA WOULD BE MOVED A MINIMUM OF 70' EASTWARD. THIS $\approx 70 \pm$ FEET MIGHT JUST BE ENOUGH TO ALLOW ^a ~~the~~ REASONABLE COST FOR ~~the~~ ^{AN} ALHAMBRA TUNNEL BORE. NOTE THAT THE TWO SINGLE FAMILY HOMES MOST EFFECTED BY THE REALIGNMENT ~~WOULD~~ NOT HAVE TO BE DEMOLISHED. BOTH COULD BE "MOVED" TO GENEROUSLY SIZED LOTS CREATED FROM WHAT WILL PROBABLY BE AN ABANDON PORTION OF ALHAMBRA BLVD.

✓ CC: STEVE HANSEN

gardengirl@att.net

John Hickey
2508 'E' Street, 95816
(916) 446-1768

William E. Reany

432 Lovella Way / Sacramento, CA 95819-2410 / [916] 452-7252 / <werlin@macnexus.org>

December 18, 2013

Statement to Community Development Department, City of Sacramento, in regards to the McKinley Village proposal DEIR Traffic Study. Specific Area discussion: 40th Street between McKinley Blvd. and "H" Street.

Specific issue: Cumulative traffic load effects of *McKinley Village* proposal upon the portions of 40th Street directly to the North of "H" Street and Mercy Hospital.

Personal introduction: Retired from career as a regional economic analyst. Resident of 566 - 40th for 33 years [between 1979 and 2011], and former representative of record for the East Sacramento Improvement Association on traffic matters relating to the then-proposed *Centrage* project during the early '90's.

I write today as a long-standing resident of 40th Street, and to register my contention that the proposed DEIR traffic study for the McKinley Village project has skirted an area which deserves a mitigation plan for the *Village's* cumulative traffic effects. In large part, this has occurred simply because the Traffic Study staff initially chose a restrictively small traffic study area to the South of "C" St., despite the well known and long-standing traffic problems of "H" Street to the East of its intersection with Alhambra Blvd. {This is touched on briefly in DEIR Table 4.9.10] and the residential streets to the North of Mercy Hospital which end there.

The need for special attention to the segments of 40th Street to the South of McKinley Blvd. and north of "H" St. is not an issue for conjecture but instead a long-standing fact of history. Parking demands relating to Mercy Hospital fill the neighborhood, both from hospital staff and individuals visiting patients in the Mercy Hospital's convalescent center [which is directly across the street from the local end of 40th St. This in turn causes peak-hour congestion around the intersection of 40th and "H", particularly before 10 AM and after 4 PM, when off-day shift Mercy parkers have no fear of two-hour parking zone violations and park more closely to "H" than the existing parking regulation allows during business hours. Although 40th Street -- as shown in the DEIR -- is a two-lane road by design, the location of two parked cars directly opposed to each other on the street effectively reduces the width of the road to only one lane. This requires motorists to stop-and-go -- on a first-come, first-served basis -- in order to pass each other while driving in the opposite direction. In addition, 40th Street is located roughly half-way between the traffic signal @ 39th Street and the sharp "S" turn on "H" Street between 42nd and 43rd Streets. This allows speeds higher than the 30 MPH limit on "H" St., making left-hand turns from 40th and pedestrian traffic across "H" both difficult and even hazardous. Similar problems of lesser but nonetheless demonstrable degrees are experienced during peak hours on both San Antonio and San Miguel Ways and 41st St. as well.

Recommendations:

I don't see changes in parking policy to be a substantial help in the peak hour traffic problems here, since there isn't justification for parking enforcement for would-be parkers arriving before 8 AM or after 4 PM: It would surely prove to be wasteful and expensive to patrol such a limited area around the hospital. Nor do I think that anyone who lives in the affected part of 40th would wish to punish visitors to the Mercy Rehabilitation Center for their desire to find parking close to the beds of their friends and loved ones.

Accordingly, I would like to suggest the addition of a single traffic diverter designed to prevent entry of southbound traffic onto 40th Street at its intersection with "D" Street [which serves as a parallel arterial to "H" St. between McKinley Blvd. and ultimately over "C" St. to Elvas Ave. to the West]. Similar diverters would not be required for either San Antonio or San Miguel Ways, since both already have disconnections between "C" Street and "H" Streets and neither directly flows from the entry roadway of *McKinley Village* from the "C" Street side. And residents of 40th south of the diverter can return home reasonably easily via the short "E" St. connection between San Antonio Way and 41st St.

Such a diverter with the appropriate signage would be a one-time expenditure, and one of relatively modest cost at that.

Thank you for your consideration of my thoughts on this matter. I would be quite interested in discussing my ideas further with you, and request that you keep me apprised of any actions taken on the issue as events unfold.

Yours truly,

// [Signature]

William E. Reany

From: Alan Parker [<mailto:enggraphx@comcast.net>]

Sent: Thursday, December 19, 2013 2:42 AM

To: Jerry Way

Subject: Alhambra/UPRR Undercrossing/Bus I-80 Onramp and McKinley Village West Access

Dear Mr. Way,

Please find attached:

1. One (1) text file – P1-Will McKinley Village Obstruct Essential State Highway and Rail Projects.pdf – Questions future highway and rail easement expansion requirements.
2. One (1) text file – McKinley Village West Access-6.pdf – Introduces the Alhambra option as a viable access alternative for McKinley Village.
3. One (1) drawing file – Caltrans Ramps 11-19-RV5.pdf - The drawing file demonstrates the proposed partial and full Caltrans Bus I-80 widening projects that incorporates the Alhambra option and is the electronic version of the drawing you received during our meeting with Steve Cohn in his office.
4. One (1) text file – Proposed Extension of Alhambra Boulevard-5JW.pdf – A support document that briefly describes the Caltrans Ramps drawing and comments on a few general Alhambra related issues.

We understand this is a very hectic time for your department and do not wish to distract you from your other tasks at hand. We appreciate your consideration and interest in reviewing the Alhambra option as a viable alternative. We are well aware that there several cards under the table, but also understand that their implementation may be 15 to 20 years out due to the land fill cap.

Wishing you and your family all the best this holiday season,

Alan Parker
East Sacramento
916-452-0186
enggraphx@comcast.net

I do not believe what follows requires any explanation, as you have been in the business long enough to recognize it immediately.

This is a profound quote from a state agency official during an informal interview:

"It is a known fact that once a perfect idea passes into the body of the political dialectic, it will reemerge unrecognizable,... if it reemerges at all."

McKinley Village West Access:

The 28th Street Surface Crossing of UPRR via the 'A' Street Bridge Overpass of Bus I-80 vs. an Alhambra Connection Undercrossing of UPRR

Introduction

The comments, recommendations and scenarios presented herein are the result of a collaboration of likeminded impartial to pro-infill development professionals. All participants have dedicated their time and expertise in analyzing a multitude of factors associated with the McKinley Village project, with a specific focus on improving site access. Our objective was to take a fresh nonbiased approach in developing a realistic scenario that would drastically improve the overall traffic ingress/egress balance expected from the McKinley Village development.

All participants concur that the primary flaw in the current McKinley Village proposal is its failure to adequately address alternate access options that would substantially improve the development's access and drastically reduce its anticipated East Sacramento/Midtown impacts. The access modification(s) that we are recommending vastly improve traffic flow by promoting balanced traffic dispersion through the opening of access locations that are destination specific. In other words, our recommendations indicate a method by which McKinley Village ingress/egress will be kept to the periphery of East Sacramento and thereby drastically reduce the use of residential streets, as is anticipated with the currently proposed access configuration using 40th Street and 28th Street.

What follows addresses what we have found to be the most critical unresolved McKinley Village issue. The issue under scrutiny is improved connectivity that would be realized with an Alhambra Blvd connection to McKinley Village and Bus I-80. We respectfully request that you consider our argument and proposal in full.

Identifying McKinley Village's Access Imbalance

As currently proposed, McKinley Village designates two site access locations, a 28th Street surface crossing of the UPRR via the 'A' Street Bridge overcrossing of Bus I-80 and a newly created 40th Street/'C' Street false intersection via a newly constructed UPRR undercrossing structure.

Based on an impartial independent analysis of these two proposed access points, it is estimated that 35% of future McKinley Village residents would initially use the 28th Street access, with 65% opting to use the 40th Street access. In the event of repetitive delays, injuries or fatalities occurring at the 28th Street/UPRR access, use of that location would decrease with a corresponding increase of use occurring at the 40th Street/'C' Street access.

We propose the elimination of the unsafe 28th Street/UPRR access option in favor of an Alhambra access option that would also serve as the new Bus I-80 onramp, when Caltrans removes East Sacramento's existing 'E' Street onramp with their current (partial) or future (full)

plan to widen Bus I-80. If the onramp issue is not addressed and resolved at this juncture, the land required for an Alhambra onramp easement will be lost with the construction of the McKinley Village development.

Alhambra Undercrossing Access and Bus I-80 Onramp – Serves a Dual Purpose

Riverwest (the McKinley Village developer), has stated that the construction of an Alhambra undercrossing of the UPRR is cost prohibitive and technically infeasible. This would be an accurate statement only if an Alhambra access connection to McKinley Village were to remain its only stated purpose.

An Alhambra undercrossing is the only viable option that would jointly function as a McKinley Village access point and serve as a replacement for the Bus I-80/'E' Street onramp. As stated previously, the Bus I-80/'E' Street onramp is scheduled for Caltrans' removal with both the 'partial' or 'full' Bus I-80 widening projects. It is an obvious fact that the removal of the existing 'E' Street onramp without providing a replacement onramp at an alternate location would result in serious traffic problems for all of East Sacramento. What we urgently suggest is that the City of Sacramento formally designate the Alhambra Blvd extension undercrossing of the UPRR as the location for the replacement Bus I-80 onramp. With that declaration of intent, additional funding options would become available in sharing the construction costs. Riverwest would then be responsible for only a negotiated percentage of the total Alhambra undercrossing costs, which could easily be recouped by a small increase of their development's density.

A future Alhambra onramp connection to Bus I-80 must be given the highest priority by the City of Sacramento. We advise that the City recognize and declare the need for a future Alhambra/Bus I-80 onramp and that it be represented in the current McKinley Village proposal. We recommend that it be incorporated within the McKinley Village proposal prior to any serious consideration of the project's approval.

Direct Benefits of an Alhambra / Bus I-80 Onramp Connection

Please consider the many advantages associated with the construction of an Alhambra/Bus I-80 onramp occurring in conjunction with the McKinley Village development:

1. An Alhambra access would facilitate balanced traffic dispersion via destination specific access points:

a. McKinley Village ingress/egress using Alhambra south to destinations: Bus-I-80 south to Hwy 99, Hwy 50, US I-5, Midtown, Downtown and all points south & west. Est. use: 40%

b. McKinley Village egress using Alhambra/Bus I-80 north onramp to destination: Bus I-80 north & east, US I-80, Cal Expo, Arden Fair and points north and east. Est. use: 30%

c. McKinley Village ingress/egress using 40th Street/'C' Street east to destination: 'C' Street, Elvas Ave, McKinley Boulevard, 65th Street, 'H' Street, 'J' Street, CSUS, Hwy 50 and points south and east. Est. use: 30%

With access at 28th Street and at 40th Street, as currently proposed, traffic dispersion is not destination specific and, rather than promoting access at the periphery of East Sacramento, it promotes the use of residential streets in both Midtown and East Sacramento as a means of migrating to the easiest route to gain access to a specific destination.

2. East Sacramento and Midtown will be guaranteed a convenient future east-bound Bus I-80 access when the existing 'E' Street onramp is eliminated by Caltrans.

3. The UPRR surface crossing at 28th Street/'A' Street bridge overcrossing of Bus I-80 would not be used for McKinley Village vehicular access, therefore Midtown would not experience any traffic increase from the new residential development. The dangers and potential inconvenience posed by the UPRR surface crossing at 28th Street for McKinley Village residents would be eliminated. If the UPRR surface crossing at 28th Street remains a point of access for McKinley Village, several rail representatives have commented frankly that it would be a matter of time before an injury or fatal incident occurs at that rail crossing.

4. With the elimination of motorized vehicle use of the 'A' Street bridge overcrossing of Bus I-80, its use would be restricted to pedestrians and bicycles only. The existing east approach ramp embankment to the 'A' Street Bridge would be removed and reconfigured in such a manner so as to provide safe pedestrian and bicycle access to Sutter's Landing Park and 28th Street via the 'A' Street Bridge. Funding expenditures currently earmarked by the developer for the 'A' Street Bridge/28th Street improvements and the proposed Alhambra pedestrian and bicycle undercrossing of the UPRR can be redirected to the construction of the Alhambra vehicular, pedestrian and bicycle undercrossing of the UPRR.

5. An Alhambra connection will facilitate improved fire, police and ambulance access/response to the McKinley Village site.

6. The western end of 'A' Street located within McKinley Village would connect directly to Alhambra extension. Its connection with the Alhambra extension would offer future McKinley Village residents two options of egress (Alhambra south, to Bus I-80 south to Hwy 50/Hwy 99, Midtown, Downtown and, via the onramp, to east-bound Bus I-80 and destinations to the north and east).

7. With the construction of an Alhambra connection and the elimination of the 28th Street surface crossing of the UPRR, mass transit would be provided safe access and an incentive to provide future service to the residents of McKinley Village.

8. When the expected traffic increase from the McKinley Village development is considered in combination with the impending loss of the Bus I-80/'E' Street onramp, East Sacramento / Midtown residents, neighborhood groups, businesses and political representatives should immediately recognize the importance of an Alhambra option and strongly support the inclusion of an Alhambra/McKinley Village/Bus I-80 connection within the framework of the McKinley Village proposal.

9. By adopting an Alhambra Boulevard/Bus I-80 onramp connection and the elimination of the 28th Street/UPRR surface crossing, we conclude that a strong majority of Midtown and East Sacramento residents would be more receptive to the McKinley Village development concept.

Site access, which has historically been the Achilles-heel of the McKinley Village parcel, remains inadequate and reflects substandard planning. The question remains, is the City of Sacramento prepared to approve a highly desirable project with inferior access in order to accommodate the project developer's bottom-line? This is the scenario that the City must evaluate carefully. The development is not the issue, achieving safe access with balanced connectivity is.

Thank you for your close consideration of this proposal. We believe it represents a vastly improved method by which a desirable McKinley Village project can be seamlessly integrated into the northern portion of East Sacramento.

If you have any questions, concerns or suggestions regarding the information presented in this document please contact:

Alan L. Parker
East Sacramento, CA 95819
(916) 452-0186
eMail: enggraphx@comcast.net

File: McKinley Village West Access-6
Rev. Date: 11-04-2013, 12:259 AM

Drawing Summarization with General Comments

McKinley Village: Alhambra Boulevard / 40th Street Access Based on a Proposed Unconventional Bus I-80 Interchange

Introduction

What follows is a summarization of several project parameters associated with the extension of Alhambra Boulevard. The extension of Alhambra would serve the dual purpose of providing an improved western access point for the proposed McKinley Village development and also function as a future onramp to Bus I-80 (to northeast), based on a proposed unconventional Bus I-80 Interchange. **The full concept is schematically illustrated on the drawing entitled: McKinley Village – Alhambra Blvd/40th Street Access Based on Proposed Unconventional Bus I-80 Interchange, File ID: Caltrans Ramps 11-19-RV5.cdr, Dated: December 07, 2013. (See Attached)**

The Drawing

The background used in the drawing is based on a Google aerial photograph from 2010. Also shown is the proposed configuration of the Sutter's Landing Park, as it is envisioned to develop within a 2015 – 2030 timeframe.

Overlaid on the background are two conceptual scenarios that illustrate the two phases of construction that would be required to fully implement an unconventional Business I-80 interchange adjacent to the existing Bus I-80/ 'A' Street Bridge.

Phase 1 - to be constructed in 2014-2015, is represented in yellow. This phase would coincide with the Caltrans partial expansion project of Bus I-80 and include an Alhambra Bus I-80 onramp.

Phase 2 - to be constructed in 2025-2030, is represented in orange. This phase would coincide with the Caltrans full expansion project of Bus I-80 and include a 29th Street offramp.

Line segments shown in white indicate the McKinley Village eastern access at 40th/ 'C' Streets and east to west internal circulation. Construction of the McKinley Village elements would occur within the Phase 1 2014-2015 timeframe.

Phase 1 Description

The proposed Phase 1 improvements would occur exclusively on the south and east side of Bus I-80 during the currently proposed Caltrans partial widening project, anticipated for 2014-2015. Construction of the extension Alhambra Boulevard would occur during this phase and start at the alleyway between 'B' and 'C' Streets. It would proceed north, pass under the existing UPRR alignment via an undercrossing structure and connect to the western terminus of McKinley Village's 'A' Street. From this new intersection of 'A' Street/Alhambra Blvd., the alignment would arc to the north/east and connect to Bus I-80 via a new merge lane that would parallel Bus I-80 along the northern boundary of McKinley Village.

This new alignment, between the new 'A' Street/Alhambra intersection and the freeway, would become the new one-way Alhambra onramp and replace the existing Bus I-80/'E' Street onramp.

With the implementation of Phase 1, all vehicular access to the 'A' Street Overcrossing of Bus I-80 would be eliminated. The extended Alhambra Boulevard would then provide two points of egress and one point of ingress and would eliminate 28th Street/UPRR at grade crossing as a McKinley Village's west access point. From the McKinley Village side of Bus I-80, the existing earth ramp, currently used to access the 'A' Street Bridge Overcrossing of Bus I-80, would be removed and reconfigured to provide a paved trail for pedestrian and bicycle access only.

It must be emphasized that the Alhambra / Bus I-80 onramp cannot coexist with an 'A' Street/Bus I-80 Bridge vehicle overcrossing; Elevation differences and space constraints render such a concept infeasible.

With the completion of the Alhambra Bus/I-80 onramp during the Caltrans partial widening project, the existing 'E' Street/Bus I-80 onramp would then be abandoned and removed. Prior to the removal of the existing 'E' Street Bus I-80 onramp, Caltrans would have to complete construction of the Alhambra onramp alternative. The extension of Alhambra appears to be the least expensive and most viable option to provide McKinley Village with an improved western access location and facilitate a future Bus I-80 onramp.

As stated in a previous document, **"An Alhambra Connection will vastly improve traffic flow by promoting balanced traffic dispersion through the opening of access locations that are destination specific. McKinley Village ingress/egress would be kept to the periphery of East Sacramento and thereby drastically reduce the migratory traffic use of residential streets to access primary destination arterials, which is anticipated to occur with the current proposed access configuration of 40th Street and 28th Street."**

Phase 2 Description

The proposed Phase 2 improvements would occur exclusively on the north and west side of Bus I-80 during the Caltrans full widening project, anticipated to begin in 2025-2030. Construction of this phase would be contingent on the degassing/stabilization status of the Sutter's Landing Park landfill.

Construction would be initiated with a new Bus I-80 offramp that would be located directly opposite of the Alhambra onramp. An offramp transition alignment from Bus I-80 would arc to the southwest and then arc to the west to intersect the existing 'A' Street right-of-way easement. The one-way offramp would terminate to create a new intersection with the extension of 29th Street. From this intersection going south, the alignment would pass under the existing UPRR rail easement and connect to the existing 29th Street, with new construction terminating at the existing intersection of 29th and 'C' Streets. From the new intersection of 29th Street and the Bus I-80 offramp, the existing 'A' Street alignment would continue to the west until it intersects the existing 28th Street/Sutter's Landing Park access road.

With the completion of the 29th Street/ Bus I-80 offramp during the Caltrans full widening project, the existing 'E' Street/Bus I-80 offramp could then be abandoned and removed.

Due to the existing ground surface grades, extensive excavation would be required to facilitate the construction of the 29th Street/UPRR undercrossing and the 29th Street/I-80 Offramp/'A' Street intersection. The excavation would require the construction of substantial retaining wall structures adjacent to the landfill cap and the UPRR embankment. From the new sub-grade 29th Street/I-80 Offramp intersection, the 'A' Street alignment would meet existing grade at the 28th Street/'A' Street intersection to access Sutter's Landing Park.

Upon completion of the Bus I-80 offramp, 29th Street undercrossing of the UPRR and the connection of 'A' Street to the Sutter's Landing Park access at 28th Street, the existing 28th Street at grade (surface) crossing of the UPRR would be abandoned and removed.

The Caltrans full Bus I-80 widening project (2025-2030) would afford an opportunity to abandon and remove the existing substandard 'A' Street Bridge structure. Pedestrian and bicycle access over Bus I-80 could be provided with a dedicated independent structure or as an added attachment to the UPRR rail alignment expansion/ Bus I-80 overcrossing anticipated to occur within the same time frame as the full Bus I-80 expansion.

Potential Intersections Requiring Traffic Signal Installation

Phase 1- 40th Street / 'C' Street, Alhambra Blvd / 'A' Street / Alhambra Blvd Onramp and Alhambra Blvd / 'C' Street.

Phase 2 – 29th Street / 'A' Street / 29th Street Offramp.

General Comments:

It must be reiterated that we are not opposed to McKinley Village or any other Sacramento infill/single family residential development. There is opposition when viable alternatives that would benefit the project and existing neighborhoods are shunned or misrepresented with an active public relations campaign. The City of Sacramento must take the lead and the responsibility to insure that this or any project will be compatible with the adjacent established neighborhoods and make every effort to adequately evaluate all viable options that could potentially reduce or redirect any anticipated project impacts.

Future Railroad and Highway Easement Requirements

As covered in an article posted to the Sacramento Press over four months ago, the McKinley Village parcel is surrounded by several proposed State and City infrastructure projects. In order to avoid a major lapse of civic judgment, it is imperative that future easement requirements are clearly defined and specific planning/design documents are drawn up and recorded prior to moving forward with the McKinley Village approval process. With the McKinley Village parcel being located adjacent to critical highway and rail alignments vital to the future of Sacramento transportation, a rush to approve McKinley Village may ultimately return to haunt the City for years to come. While the project is still at the paper and DEIR

stage, City and State agencies are afforded the opportunity to thoroughly vet the future plans for highway and rail projects, in and adjacent to the McKinley Village/Sutter's Landing Park area.

Who Would Pay for an Alhambra Undercrossing

The Alhambra undercrossing is a prime example of a viable solution that has been spun by public relations to appear infeasible due to technological and/or financial limits. The claim of being technologically infeasible is ludicrous and the financial infeasibility would be true only if the developer were held responsible for the entire cost of the construction of an Alhambra extension.

We have never inferred that the funding of an Alhambra extension and Bus I-80 onramp would be the sole responsibility of the developer. With a declaration of intent, by the City of Sacramento, that the future extension of Alhambra Boulevard would be required to serve as a replacement onramp for Business I-80, project funding sources would then be accessible from many diverse public/private sources. With active public relations and negotiation efforts the number of participating cosponsors is unlimited. Riverwest would ultimately be responsible for only a percentage of the total Alhambra costs, with that percentage directly dependant on the efforts expended by participating interests in securing cosponsors.

Potential participating cosponsors may initially include the developer (Riverwest), Caltrans, Union Pacific Railroad, the City of Sacramento, environmental groups, business interests, etc. This presents an opportunity for the City, the developer and East Sacramento/Midtown residents to participate in identifying and securing Alhambra project cosponsor funding.

If it becomes evident that the construction of McKinley Village and the construction of the Caltrans/Bus I-80 partial widening project will not coincide, Caltrans, in conjunction with Riverwest should determine and design the easement that would be required for the construction of an Alhambra undercrossing and onramp. With the easement defined and established, the Alhambra undercrossing and onramp could then be constructed in conjunction with the Caltrans partial Bus I-80 widening project (2014-2015), with Riverwest responsible for only a negotiated cosponsor percentage of the estimated Alhambra construction cost total.

A Shoofly (Temporary Rail Bypass)

A railroad shoofly facilitates the temporary rerouting of rail traffic where major construction projects may prove disruptive to the primary railroads service/schedules. A shoofly insures uninterrupted rail service operation and can be a costly method that Union Pacific normally requires. Again, the temporary construction and then removal of a rail shoofly can be a costly procedure, especially when required to pass directly over an existing highway, such as Bus I-80.

Video that shows a shoofly in operation while a rail undercrossing is being constructed:
http://www.youtube.com/watch?v=5YsxMwuw_W8 .

There are substantial contractor costs involved in getting equipment, materials and personnel on site to begin the construction of a rail undercrossing(s). With the proximity of Alhambra to the proposed 40th Street access tunnel, the costs to construct two undercrossings at the same time would be considerably less than constructing each independently and at different times. Should the McKinley Village development be approved and built prior to the construction of the Alhambra undercrossing, the shoofly that is currently required by Union Pacific may be render the Alhambra tunnel impossible.

Alternative Tunneling Methods Not Requiring a Shoofly

There are currently three rail tunneling methods being used extensively in Europe, the Midwest and Eastern United States that require no shoofly. One method used is known as the New Austrian Tunneling method (NATM), which is also known as Sequential Excavation Method (SEM) <http://www.youtube.com/watch?v=HCyz5xMp9gQ> . The use of this method within Union Pacific easements is strictly forbidden.

Another method, known as 'Top-Down' method of tunnel construction, has been used on rail alignments throughout the World and U.S... This method has been permitted for pedestrian and bicycle undercrossings of Union Pacific alignments, but has not yet been permitted for vehicle undercrossings within rail easements that are under the exclusive jurisdiction of Union Pacific. Anyone of these alternative methods can reduce rail tunnel construction costs from 25 to 50%. The Alhambra undercrossing would be an ideal application for the Top-Down method, but currently not permitted by Union Pacific.

Surface/at grade railroad alignment crossings are rapidly becoming obsolete. Surface/at grade railroad crossings will not be permitted to exist on any California High Speed Rail alignment. The Union Pacific Railroad alignment/easement that exists along the southern boundary of McKinley Village will be shared with high speed rail. There is a growing incentive and demand among most railroad interests that Union Pacific may be forced to adopt one or more of the undercrossing techniques, in order to cut costs and reduce construction time. It may prove worthwhile to intensively lobby Union Pacific to permit the use of the 'Top-Down' method in the construction of an Alhambra/UPRR vehicle undercrossing.

Addressing the Unknowns:

If it is determined that one of the primary reasons an Alhambra / Bus I-80 onramp cannot be constructed is because the resulting Caltrans easement expansion would require additional acreage from the McKinley Village parcel to make room for a Bus I-80 merge lane; the City, Caltrans and the developer should evaluate and deal with this conflict now, at the DEIR stage, rather than ignoring the conflict and pushing the problem forward.

If another primary reason an Alhambra / Bus I-80 onramp cannot be constructed is because it would conflict with future City/Caltrans plans to construct a Sutter's Landing Parkway and an associated Bus I-80 Interchange; the City should publically reveal what those plans are so that the overall concept can be fully evaluated by all interested parties at the DEIR stage, rather than ignoring potential future conflicts and delegating the problems forward for the next generation to resolve.

If you should have any questions, criticisms or suggestions, please contact me. Thank you Mr. Way for your consideration and interest.

Alan Parker
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enggraphx@comcast.net

Will McKinley Village Obstruct Essential State Highway and Rail Projects?

By: Alan Parker - Civil Engineering Design/Municipal Planning/Mapping Consultant (Retired - 2008)

Opinion: Originally Published to The Sacramento Press on August 8, 2013

Development of the proposed McKinley Village on a 48 acre parcel of land located in East Sacramento may ultimately prove to be an obstruction for several of our region's future highway and rail system improvement projects. Any permanent development permitted on this parcel prior to a full understanding of the future easement requirements for each of these proposed projects could result in severely limiting or obstructing their implementation.

There are currently three known State level transportation improvement projects being proposed that are directly adjacent to the McKinley Village parcel. Each project will be dependent on critical easement adjustments that would require additional land from the McKinley Village site which could substantially reduce the parcels developable acreage.

The Proposed State Highway and Rail Projects

1. Future Business I-80 (or Caltrans Hwy SR-51) / American River Bridge Widening (from Arden Interchange to E Street)



STATE ROUTE 51 PRELIMINARY INVESTIGATION



The future widening of Business I-80 (Hwy SR-51) from Arden Way to E Street will require a corresponding expansion of the highway right-of-way easements. Due to the sensitivity of the Sutter's Landing landfill (earth-encapsulation) cap located to the north along the southern boundary of Sutter's Landing Park, a majority of the easement expansion would have to be acquired from the McKinley Village parcel to the south.

The expansion of Bus I-80 (Hwy SR-51) has been urgently needed for many years. Its construction would help to alleviate the traffic bottlenecks and pollution currently associated with this problematic section of Highway Bus I-80 (Hwy SR-51).

Options for future Highway SR-51 (Bus I-80) improvements are currently under study by Caltrans: See "State Route 51 Preliminary Investigation – Dated 01-08-2013":

<http://www.dot.ca.gov/dist3/departments/planning/csmpr/2012%20SOTC%20Reports/SR%2051%20P1%20Final.%20Signed.%2001-08-13.pdf>

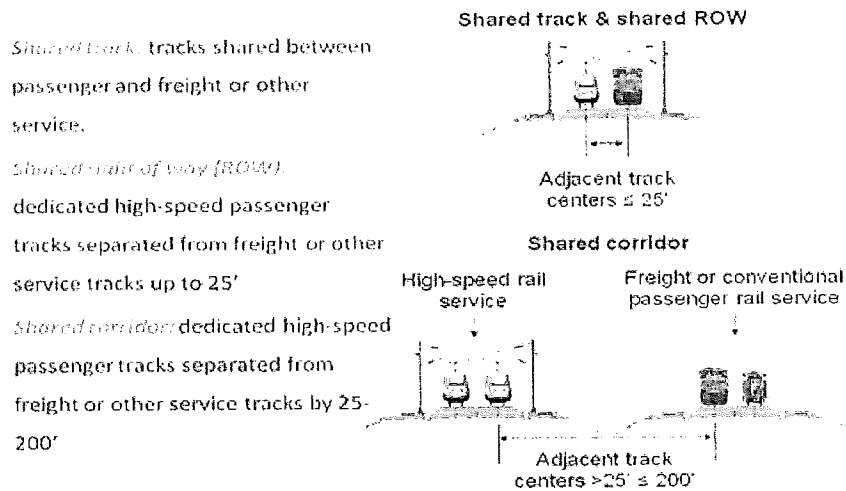
2. Future Capital City commuter ‘Third Rail Project’

There are pending plans for the construction of a new dedicated track alignment for exclusive use by the Capital City commuter train and would extend from the Sacramento Station east to Roseville/Auburn. It would run parallel to the existing Union Pacific Railroad (UPRR) tracks and would require a minimum track separation of 25 feet from the existing UPRR freight track alignments. The new commuter track alignment is proposed to be constructed to the north and west of the existing UPRR track alignments along the southern and eastern boundary of the McKinley Village site. Any potential expansion of the elevated rail bed would have to occur toward the McKinley Village’s southern boundary.

Declarations of intent and design criteria for the Future Capital City commuter ‘Third Rail Project’:
http://www.dot.ca.gov/hq/transprog/ctcbooks/2011/0611/045_2.1a8_Sac-Roseville_Track.pdf
http://www.capitolcorridor.org/included/docs/business_plans/13_15_Business_Plan.pdf
http://www.uprr.com/aboutup/operations/specs/attachments/grade_separation.pdf

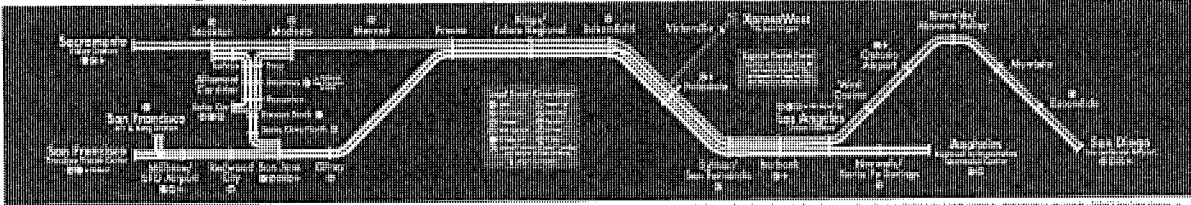
3. Future California High Speed Rail Project – Phase 2 Merced Station to Sacramento Station

Shared-Use Corridor Operating Configuration



One major easement consideration that appears to have been overlooked or completely ignored by all parties is that of the future alignment for the proposed California High Speed Rail (CHSR). This alignment has been slated to occupy the same elevated rail bed that is currently being used and maintained by Union Pacific Railroad (UPRR) and parallels Elvas Avenue, continues around the Lanatt curve adjacent to the McKinley Village site and terminates at the proposed Sacramento Station to be located downtown. California High Speed Rail (CHSR) would require two track alignments for unobstructed travel from south to north and north to south. The CHSR/UPRR operating configuration will be that of a ‘Shared Corridor’ thereby insuring adequate alignment separation and intrusion protection of freight rail from high speed rail. As an example: The CHSR/UPRR alignment separation that would be required at the Lanatt curve could vary from 50 feet to 200 feet, depending on the final design requirements.

CALIFORNIA High-Speed Rail



The two proposed CHSR track alignments would be located to the far south side (East Sacramento and Midtown side) of the existing UPRR rail bed. Most if not all of the CHSR easement expansion would have to be acquired from parcels located to the north of the existing UPRR. The immediate proximity of existing homes, businesses, backyards and other fixed structures to the south of the CHSR/UPRR shared corridor dictates the necessity to meet any additional easement requirements from parcels located to the north. In other words, any easement expansion would have to be acquired from the southern portion of McKinley Village and the southern portion of the proposed western expansion of Sutter's Landing Park. With the addition of the CHSR alignments to the existing elevated UPRR rail bed, the rail-bed width would essentially double, with the width potentially tripling along the southern boundary of McKinley Village adjacent to the Lanatt curve. With the CHSR alignments occupying the most southern portion of the existing UPRR rail-bed, the UPRR freight and the proposed Capital City commuter rail alignments would correspondingly have to be relocated to the north and occupy the newly expanded easement and rail bed.

California High Speed Rail Intrusion Protection Technical Memorandum:

<http://www.calhsr.com/wp-content/uploads/2011/01/TM-2.1.7-Intrusion-Protection-081025.pdf>

Brennan M. Caughron, M. Rapik Saat, Christopher P.L. Barkan, Rail Transportation and Engineering Center (RailTEC), University of Illinois

<http://ict.illinois.edu/railroad/CEE/pdf/Conference%20Proceedings/2012/Caughron%20et%20al%202012.pdf>

Conclusion:

These three State projects are currently in preliminary or proposed status and to my knowledge no design documents have been drafted or formally submitted. Prior to any official deliberations regarding the development viability of the McKinley Village site, responsible City and State agencies must fully address the following issues:

1. By allowing the development of McKinley Village to proceed, will the construction of any pending State highway or State rail projects be jeopardized or obstructed?
2. If the development of McKinley Village is permitted by the City and in the immediate future it is determined that one or all of these State transportation projects must be implemented, will taxpayers be responsible for paying the costs associated with the condemnation and acquisition of private property for expanded easements via eminent domain?

It is my sincere hope that City officials will fully address these project requirement issues in order to insure that each future project can be successfully implemented without costly obstructions or hindrances. By failing to do so, the City of Sacramento will demonstrate a lack of foresight and misguided priorities that would result in the delay or obstruction of essential regional and state-wide transportation improvement projects.



LEGEND:

- 2014-2015 Phase 1 Construction
Alhambra Extension/Bus I-80 Onramp
- 2014-2015 Construction
Existing Phase 1 Support Arterials
- 2025-2030 Phase 2 Construction
29th Street Extension/Bus I-80 Offramp
- 2025-2030 Construction
Existing Phase 2 Support Arterials
- 2014-2015 McKinley Village Construction
Traffic Access and Internal Circulation
- 2014-2015 McKinley Village 'A' Street Bridge
Pedestrian / Bicycle Access Trail
- Arterial Traffic Flow Direction
One-Way or Two-Way
- Street Intersection Requiring Traffic Light
Three (3) in Phase One and One (1) in Phase 2
- Southernmost Construction Limit
For Alhambra & 29th Street Improvements
- 2014-2015 Phase 1 - Abandon and Remove
Bus I-80/'E' St. Onramp Once Bus I-80/
Alhambra Onramp is Completed and In Service.
- 2025-2030 Phase 2 - Abandon and Remove
28th Street Vehicle Crossing of UPRR.
Abandon and Remove Bus I-80/ 29th St./'E' St.
Offramp Once Bus I-80/ 29th St./Sutter's Landin
Parkway Offramp is Completed and In Service.

Caltrans Ramps 11-19 RVS.cdl, December 07, 2013

McKinley Village Site

PROPOSED
DEVELOPMENT
(NOT IN STUDY)

Sutter's Landing Parkway
Richards Boulevard

Bus I-80/29th Street/
Sutter's Landing Parkway Off-Ramp
Sutter's Landing
Park Access

INTERSTATE 80

C St Alley
27th St Alley
Street-D St Alley

29th Street/
UPRR Undercrossing

'A' St. Bicycle
Pedestrian Trail

Alhambra/Bus I-80
Onramp

Alhambra Boulevard
McKinley Village West Access

40th Street/UPRR Undercrossing
McKinley Village East Access

Lanatt St
Elvas Ave

Alhambra Boulevard
UPRR Undercrossing

EXISTING
PARKING LOTS

EXISTING
BASKETBALL
COURTS

EXISTING
DOG PARK

B St

33rd St

34th St

39th St

San Miguel

San Antonio W

40th St

Meister Way

Lupine Way

20th Way

21st Way

Google

McKinley Village: Alhambra Blvd/40th Street Access



- LEGEND:**
- 2014-2015 Phase 1 Construction
Alhambra Extension/Bus I-80 Onramp
 - - - - - 2014-2015 Construction
Existing Phase 1 Support Arterials
 - 2025-2030 Phase 2 Construction
29th Street Extension/Bus I-80 Offramp
 - - - - - 2025-2030 Construction
Existing Phase 2 Support Arterials
 - 2014-2015 McKinley Village Construction
Traffic Access and Internal Circulation
 - - - - - 2014-2015 McKinley Village 'A' Street Bridge
Pedestrian / Bicycle Access Trail
 - <<< Arterial Traffic Flow Direction
One-Way or Two-Way
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Bus I-80/ 'E' St. Onramp Once Bus I-80/
Alhambra Onramp is Completed and In Service
 - ⊗ 2025-2030 Phase 2 - Abandon and Remove
28th Street Vehicle Crossing of UPRR.
Abandon and Remove Bus I-80/ 29th St./ 'E' St.
Offramp Once Bus I-80/ 29th St./ Sutter's Landin
Parkway Offramp is Completed and In Service.

Caltrans Ramps 11-15-RVS.cdr, December 07, 2011

McKinley Village Site

PROPOSED
DEVELOPMENT
(NOT IN STUDY)

Sutter's Landing Parkway
Richards Boulevard

Bus I-80/29th Street/
Sutter's Landing Parkway Off-Ramp

Sutter's Landing
Park Access

INTERSTATE 80

Alhambra/Bus I-80
Onramp

Alhambra Boulevard
McKinley Village West Access

40th Street/UPRR Undercrossing
McKinley Village East Access

Alhambra Boulevard
UPRR Undercrossing

EXISTING
PARKING LOTS

EXISTING
BASKET BALL
COURTS

EXISTING
DOG PARK

29th Street/
UPRR Undercrossing

'A' St. Bicycle -
Pedestrian Trail

27th St Alley
Street-D St Alley
27th St
30th St
31st St
32nd St
33rd St
34th St
35th St
36th St
37th St
38th St
39th St
40th St

B St
C St
D St
E St
F St
G St
H St
I St
J St
K St
L St
M St
N St
O St
P St
Q St
R St
S St
T St
U St
V St
W St
X St
Y St
Z St

Lanatt St
Elvas Ave
Lupitre Way
Meister Way
Tivoli Way
San Miguel
San Antonio W
40th St

McKinley Village: Alhambra Blvd/40th Street Access



Physicians for Social Responsibility/Sacramento
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916 955-6333

December 19, 2013

Dana Allen, Associate Planner, City of Sacramento
Community Development Department
300 Richards Blvd, 3rd Floor
Sacramento, California 95811
By e-mail: dallen@cityofsacramento.org

Re: Draft Environmental Impact Report (DEIR) for the McKinley Village project

Dear Ms. Allen:

The DEIR for the McKinley Village project does not adequately address the health impacts for the residents of the proposed project. As stated on page 4.1-5 in Section 4.1 (Air Quality and Climate Change), Sacramento County's levels of ozone and particulate matter are above attainment levels. Regional air pollution already places our entire community at risk for adverse health effects.

It is well established that proximity to highways is associated with adverse health impacts. According to an August 23, 2012 report by the California Air Resources Board (CARB)¹, these include: exacerbation of asthma, impaired lung function, increased heart disease, new-onset chronic obstructive pulmonary disease, a faster progression of atherosclerosis, increased risk of premature death from circulatory disease, and increased incidence of new heart disease. Other effects include increased risk of low birth weight and increased risk of preterm delivery for mothers.

Numerous peer-reviewed studies have documented the additional health risks for children living in close proximity to highways. These health impacts include an increase in asthma in children who live within 417 meters (1/4 mile) of a major roadway (as evidenced by higher incidents of wheezing requiring inhaler use and increased hospitalizations).² Studies also show that exposure to near-roadway pollutants (independent of regional air pollution levels) add additional risk as evidenced by lowered childhood lung function.³

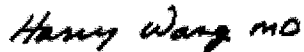
Recent research has also shown that living within 309 meters (0.2 miles) of a freeway during the third trimester, after adjusting for other variables, is associated with an increased risk of having an autistic child.⁴

It is our understanding that the entire project will be located within 417 meters of the freeway and it is anticipated that the closest residence will be 58 feet from the freeway (Appendix C,

page 1). CARB recommends avoiding "siting new sensitive land uses within 500 feet of a freeway."⁵ This recommendation is acknowledged in the DEIR in Appendix C, p. 10-11.

The best available scientific research indicates that significant health impacts for children can be lessened if they live at least 1370 feet (417 meters) from a major roadway. This information should be considered as this project is being reviewed.

Sincerely,



Harry Wang, MD
President, Physicians for Social Responsibility/Sacramento

¹ California Environmental Protection Air Resources Board. Status of research on potential mitigation concepts to reduce exposure to nearby traffic pollution, August 23, 2012, p. 2-3.

² Brown MS, Sarnat SE, DeMuth KA, Brown LA, Whitlock DR, Brown SW, Tolbert PE, Fitzpatrick AM. Residential proximity to a major roadway is associated with features of asthma control in children. PLoS One. 2012;7(5):e37044. doi: 10.1371/journal.pone.0037044. Epub 2012 May 17.

³ Urman R, McConnell R, Islam T, Avol EL, Lurmann FW, Vora H, Linn WS, Rappaport EB, Gilliland FD, Gauderman WJ. Associations of children's lung function with ambient air pollution: joint effects of regional and near-roadway pollutants. Thorax. 2013 Nov 19. doi: 10.1136/thoraxjnl-2012-203159.

⁴ Volk HE, Hertz-Picciotto I, Delwiche L, Lurmann F, McConnell R. Residential proximity to freeways and autism in the CHARGE study. Environ Health Perspect. 2011 Jun;119(6):873-7. doi: 10.1289/ehp.1002835. Epub 2010 Dec 13.

⁵ California Environmental Protection Agency California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005, p. 10.

Dear Councilmember Hansen:

At the December 11 Town Hall Meeting you had asked that additional comments be submitted in writing. Please forward this to the EIR committee.

I was the individual who asked about the access being along 30th street, since there is talk of Caltrans eliminating that onramp. Two objections were brought up: The first was that it was unknown if Caltrans would actually remove the onramp. I have worked in the field of development, and I am aware that projects can be held up for years waiting for Caltrans to decide what kind of right-of-way they want at a highway intersection. This land has always been undeveloped, and it would be in the interest of the community if development were postponed until Caltrans commits to its freeway design. The second argument had to do with multiple track crossings. I propose the entire Sutter's Landing Park be accessed along the same 30th street route. Because of the one-way configuration that currently exists on 30th street, not to mention the overhead freeway in the front yards of the buildings located on 30th street, the area has little residential charm. The current access, 28th street, is still a residential street that is already heavily impacted due to the traffic calming project that was initiated about 15 years ago. Both impacted neighborhoods would benefit by having the access along a recognized thoroughfare.

I would like to say that I was disappointed at the tone of the Town Hall meeting, and I can understand why some residents are frustrated. Many serious ideas were floated at this meeting, and every one of them was shot down. At no point was it mentioned that the way to mitigate the traffic is to have less of it by reducing the number of proposed units in the development. I understand I am now getting into planning issues, but I think it is time to bring them up.

This development would not be feasible if it had not been designed with multiple variances. Furthermore, the density appears to be much higher in this area than in the surrounding neighborhoods. I propose the city establish an average density of the neighborhoods being impacted by this project and request the developer to resubmit the design using that same average density, and the same zoning code the rest of the city must adhere to.

As Sean Ward said at the meeting, the city wins, the developer wins, even the new residents win-but without a doubt there is absolutely nothing in this development that will benefit those of us who should have been able to reasonable assume a development on the other side of the freeway would not be dumping traffic in our front yards.

Thank You,
Shelly Lusk,
2502 D Street

Shelly.lusk@sbcglobal.net.

Dana Allen

From: Bruno Barreyra <barreyra@gmail.com>
Sent: Thursday, December 26, 2013 10:32 PM
To: Dana Allen; Steve Cohn
Subject: About the McKinley Village project

Dear Ms. Allen and Mr. Cohn,

I am writing you to protest against the construction of the so-called "McKinley Village" in the outskirts of East Sac. This project not only does not follow the character of the region, but it would also harm the existing community. It is but a cheap attempt to try to cash in on one of Sacramento premier neighborhoods.

Before I go on, I feel it's important to make it clear that I grew up in a very high density city (Rio de Janeiro) and I'm a great proponent of urban density and, especially, of walkable communities. I have recently moved from the suburbs in Folsom to East Sac precisely to escape the homogenous, characterless and car-centric developments that plate so much of the modern American landscape. I believe that McKinley Village follows this model of development.

My major concerns with the project are related to transportation: it is absolutely unfeasible to add that number of houses in that space, have no commerce, and add only two access points to boot. East Sacramento already has a traffic problem. If you don't believe me, I suggest you try driving on Folsom Boulevard during early evening rush hour traffic. Or, try to navigate around the business 80 and 50 corridor highway junctions. The area is already saturated with cars. Having no commerce there requires for all residents to jump into their cars if they so much as run out of toilet paper. Having two access points (and no direct highway access into the already busy business 80) will add even more traffic to the region. I live on 40th street, and we already see more through traffic on this street than one would deem appropriate for a residential neighborhood. As the main thoroughfares (Elvas, Folsom, J, Alhambra), start choking up due to excess of traffic, it is the smaller streets that will pay the price.

And pay the price we will, as not only the added traffic will further undermine our peace here (I can hear the highway traffic at all hours of the day from my house, silence is not a commodity I enjoy), but also the value of our houses. The flooding of cheap housing into the area will also have a similar effect, and I haven't touched upon the impact on the local schools.

I would love to see that area developed. But please let's do it responsibly. This is the wrong project for our city. If the city takes a stand and says no to careless development, the right development will happen. Sacramento can and should be a lot nicer than it is right now, please help us make this small step to make it so.

Cordially,

Bruno R. Barreyra

From: Greg deGiere <greg.degiere@gmail.com>

Date: Thursday, December 26, 2013 9:41 PM

To: "shansen@cityofsacramento.org" <shansen@cityofsacramento.org>

Subject: McKinley Village - please submit for EIR

Steve

Here is another alternative

Totally close 28th Street at B Street, routing all traffic to 29th Street, an almost entirely commercial street. This would avoid putting large numbers of vehicles onto 28th, an entirely residential street, as either a half- or full-closure of 28th would do. It also would relieve C Street between 28th and 29th of some of the existing traffic, including trucks. It also would avoid putting more traffic onto C, as a closure of 28th at C would do.

A half closure of 28th, on the other hand, would still put much more traffic onto 28th and also onto C. A half-closure also would create a safety hazard as some drivers drive around the half barrier.

Greg deGiere
PO Box 163192
Sacramento, CA 95816

Dana Allen

From: Douglas Thompson <olivebranch2@gmail.com>
Sent: Friday, December 27, 2013 11:54 AM
To: Dana Allen
Cc: Doug Thompson
Subject: Draft EIR for the McKinley Village Project (P08-086) Section 4.9, Transportation and Circulation

27 December 2013

Dana Allen, Associate Planner
City of Sacramento Community Development Department
Environmental Planning Services
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Re: Draft EIR for the McKinley Village Project (P08-086)
Section 4.9, Transportation and Circulation

Caltrans is in preliminary planning for a permanent closure of the E Street on-ramp to Business 80. It is unclear how the traffic studies for the McKinley Village project (project) account for this scenario. The Draft EIR includes the statement, "Section 4.9.5 considers the cumulative impacts of the proposed project as well as planned transportation projects (and land use development) within the study area, including the closure of the E Street on-ramp to the Capital City Freeway (Business 80), improvements to the Capital City Freeway, and the construction of Sutter's Landing Parkway." At the same time, SACMET output is provided for E Street on-ramp volumes and delay times with and without the project. Seventeen percent of outbound trips are projected to access the on-ramp (Figure 4.9-8), while none are shown for the J Street on-ramp.

Please clarify whether, how, and at what point in time the E Street on-ramp closure has been incorporated into the project traffic studies. At what point in the future is the on-ramp assumed closed? What are the specific impacts of the project on traffic circulation and access to the J Street on-ramp under a closed E Street on-ramp scenario? Have these impacts also been included in the study of localized air quality effects?

If a scenario that includes E Street ramp closure as early as 2015 has not been fully analyzed, an analysis that includes traffic and localized air quality impacts should be completed and released for public review prior to project approval.

Thank you for the opportunity to comment.

Douglas Thompson
529 40th Street
Sacramento, CA 95819
olivebranch2@gmail.com
dth@olivebranch2.com

Sacramento December 27th 2013.

Re: Proposed McKinley Village,

M.Dana Allen,

When I think of the proposed McKinley village I see an ugraded compound surrounded by two 20 or 25 feet tall walls : one on the freeway side and one on the railroad side with few exits on the railroad side only.

To tell you the truth what it reminds me of is a Prison.

I don't like it and don't think that it enhances my neighborhood.

Sincerely,

Monique Melvin

Moniquemelvin @ Comcast.net

*Monique Melvin
4177 C St.
Sacramento, CA 95819*

Dana Allen

From: miller396@comcast.net
Sent: Saturday, December 28, 2013 4:32 PM
To: Dana Allen
Subject: McKinley Village

My wife and I retired to East Sacramento nearly 10 years ago because of its ambiance, which is being menaced by the latest developer menace. While the previous failed attempts were derailed by the facts, this one worries us because of the clout of Phil Angelides. As a former opinion writer for two major metro dailies, I am acutely aware of the juice that politically connected individuals can have on dubious projects.

We have attended the dog and pony shows wherein Riverview Capital Investments and the developer have blithely avoided answering specific concerns raised by residents and are reflected in the draft report. We've also received slick mailers from the company suggesting that this proposed village will have no adverse effects whatsoever.

The salient question is whether the city has the spine to reject this latest bad idea to negatively impact a very special community.

Alan & Rosemary Miller
396 36th Way
Sacramento, CA 95816

12/29/13

Dana Allen, Associate Planner
City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, California 95811
dallen@cityofsacramento.org

Re: Public comments regarding Mckinley Village

I am a homeowner living on the north side of Mckinley park and feel I have the potential to be directly impacted by the proposed development of Mckinley Village. I am in support of the project and feel that the city of Sacramento needs to move forward doing what is best for the city at large.

In coming to this conclusion, I recognize that there may be immediate negative impacts to the surrounding area. But these are speculative at the moment and the recent traffic study seems to indicate that at least the traffic component would not be a major impact. Simply put, the city needs to decide where to put additional housing. We can choose to move housing farther away from the city (suburbs), but using the areas that are in the immediate vicinity is probably a better long term solution. Here are some of my current thoughts:

Pedestrian friendly: although the plan is not ideal, it does provide for at least one pedestrian walkway to Mckinley Park. There is also the potential for access and increased use of Sutter's landing. The plan also includes a new park and pool that could be used by the adjacent neighbors, not just the residents of Mckinley Village.

Traffic: the recent traffic study indicates that the traffic to the surrounding community would be minimal. It is no secret that the people living in the village would have to contend with railroad and freeway noise. But there are many residences around Sacramento, the state, and other cities that have similar designs and people manage just fine. I don't see this as a major negative.

Density: personally, I like thriving and active communities. I walk Mckinley park regularly and I enjoy seeing the residents use the park and its many amenities. When I travel to other cities, it's those dense areas that have the potential to thrive and bring in new energy. That's a benefit to the neighborhood and the city. I think Mckinley Village has the potential to help this vision.

Property values: I've saved this one for last. There are many who believe that property values may be negatively affected. That could certainly be the case and given where I live, I would definitely feel that. But I didn't buy my house to make sure my property appreciates. I bought it because I enjoy the park, the neighborhood, the city, etc. Additionally, as I alluded to before, the City of Sacramento needs to do what's in the best interest of the city, not just East Sacramento or a subset of its residents.

Thank you for allowing me to address some of my thoughts regarding this project. I hope that the project moves forward.



Rafael Rodriguez
3165 Mckinley Blvd.
getrodiguez@gmail.com
916-440-6097

Dana Allen

From: Susan Norris <sunorris@ziprealty.com>
Sent: Friday, January 03, 2014 10:24 AM
To: Dana Allen
Subject: You R so far up Phil's Butt

Dear Mr. Allen,

Is the city so desperate for money that they will build a new neighborhood that they will destroy an older, established neighborhood? One of the best Sacramento has.

The new neighborhood is crammed with 358 homes. No yards. Windows that open in the back of the house. Right up to a freeway, which is stalled all the time, and a train track with (we counted in one day) 65 trains.

Is this really a good place to build houses? All you have to do is look at the site./Common sense.
This is an Elk Grove/Natomas project.

Why is the freeway not in the traffic report? Does the city take in consideration the hospital is going to have 150 new homes? Tastefully done, I might add.

With the new Arena coming, this is going to add alot of new traffic to East Sac on game nights.

You think this new neighborhood will add revenue, but did you stop to think with all the traffic to East Sac, this will drop property values and property tax?

The streets surrounding the opening of McKinley Village will be doomed, and their streets will become flooded with cars, and their values right off will go down.

You people are so far up Phil's butt!!!!

Susan Norris, Realtor, Lic #01328937
Zip Realty Lic#01441810
Cell: (916) 849-6421
Toll Free: 1-800-CALL ZIP x 5969
Fax: 888.262.5996
sunorris@ziprealty.com

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, California 95811

January 3, 2014

Re: McKinley Village DEIR Response

Dear Ms, Allen

My concerns with this project are the traffic it will generate on narrow residential streets that were not designed for thoroughfare traffic and the impact this increased traffic will have on safe routes to schools. I do not see that the DEIR adequately or objectively addresses these issues as explained below.

Section 4.6 Existing Railroad Noise Environment

The railroad noise study commissioned by the developer, via Dudek, was performed by Bollard Acoustical Consultants for six days in 2013 (Sect. 4.6). The conclusions from this study significantly differs from the numbers provided to the City by Union Pacific Railroad and the Department of Transportation as to the of the number of trains passing the 28th street at grade crossing on a 24 hour basis.

All trains crossing at points 4, 5 and 6 per Fig 4.6-1 will stop traffic at the at grade 28th Street. According to the Bollard Noise Study (Table 4.6-5) that would be 23-27 trains per day. Section 4.6 of the study states "according to UPRR, homeland security reasons prevent UPRR from releasing any specific information pertaining to train schedules or frequency of train travel (pers comm. Jim Smith)." However, "UPRR verbally indicated that freight trains run on a 24 hour basis and that up to 40 total trains pass by the project site." Section 4.6 also cites information posted on July 10, 2013 on the Federal Railroad Administration (FRA) website indicating that an average of 41 total trains pass through the 28th Street crossing per day.

Both UPRR and the FRA state that 40-41 trains per day cross at 28th Street, twice as many as the Bollard Study claims. Yet the Bollard Noise Study, the statistical outlier by almost 50%, is used as the basis to determine noise within the project and traffic impact at the 28th Street crossing. Using only the outlier statistics rather than those provided by both the FRA and UPRR create an unrealistic projection of noise and traffic patterns and provides an unreliable and skewed determination of traffic patterns and noise impact.

A fair statistical analysis would not rely on a study that used primarily outlier information as the basis of a report. To create a fair and accurate projection the information obtained from UPRR and the FRA should at the very least be factored in.

If the FRA numbers and the UPRR numbers are accurate, the 28th Street crossing will be blocked twice as often as the traffic study suggests thus creating heavier use of the 40th street access.

The traffic and noise models should be rerun to include the UPRR and FRA numbers.

Chapter 2, Project Description- -Site Access Overview

This section of the DEIR concludes that a vehicle underpass at Alhambra is infeasible due to several reasons. All of the potential obstacles cited, (need for a shoofly, utility relocation, eliminating B Street access to Alhambra, need for a surge tank for water runoff, are all similar issues encountered by the City of Merced when building a railway underpass two years ago. (Information on the Merced project has been provided to Greg Bitter for distribution to City staff.) The DEIR does not provide any substantiating evidence as to why these obstacles cannot be overcome. The City and the developer need to substantiate why these obstacles cannot be overcome.

An Access at Alhambra is the logical connection from the project to commercial services. It would best serve the City to revitalize the north end of Alhambra Blvd and would address the traffic issues that will be created by creating a vehicle access at 40th Street.

The City and the developer need to show why the methods used in Merced cannot be used at the Alhambra site.

Sources Cited at the end of Chapter 2 include Federal Railroad Administration (FRA) 2013 "U.S. DOT Crossing Inventory Information as of 8/14/2013: Crossing No. 753497W.

How and where is this crossing reference used?

Chapter 5 Alternatives

The alternative for an underpass at Alhambra was not included or considered in Chapter 5 Alternatives. This alternative would significantly reduce the impact on the existing neighborhood around 40th Street where the proposed access is to be placed, it could be done without the costly, time consuming, disruptive construction of a shoofly. Information on this alternative has been provided to the City as noted above.

The Alhambra access alternative should be reviewed and thoroughly evaluated as were other alternatives contained in Chapter 5.

Appendix O Sub-appendix F School Traffic Analysis

The school traffic analysis was done prior to the 2013-2014 school year. In September of 2013 Theodore Judah absorbed the students from the recently closed Washington School in midtown. The addition of these additional 40+ students, whom we welcome, has had a very visible impact on the traffic around the school which is not reflected in the traffic report since it was conducted prior to that time.

The study needs to reflect this increase in traffic, it's direction and duration, particularly during the morning drop off period at Theodore Judah, to ensure that all students have a safe route to school.

Maps

- Figure 2-23 shows the aerial map with the access between Meister and Tivoli while Figure 2-24 shows the access between Tivoli and 40th. This is confusing. Is the access at 40th and Tivoli or Meister and Tivoli?
- All of the maps in Appendix O, Sub Appendix F, School Traffic Analysis have the number of cars exiting the project obscured by the street name having been printed directly over it. It is impossible to see how many vehicles will come out of the project during the morning peak hour for schools.

This needs to be clarified and more time allowed for public review once the traffic information at the proposed 40th Street extension is clearly provided.

Building of a Shoofly

The DEIR contains detailed information about the tunneling, trenching, estimated numbers of trucks per day, and approximate time for building the tunnel at 40th street. Nowhere could I find any information that addressed the construction of a shoofly. To build an elevated shoofly, which is what will be needed, would require either extensive earth moving to construct an elevated support similar to the embankment that currently exists or an trestle.

Any method of constructing the shoofly will have significant noise, dirt and traffic impacts which I do not see addressed.

I look forward to the City's response to my concerns,

Sincerely,

Tina Cerruti

440 San Miguel Way

Sacramento, CA 95819

From: [Ellen Hoffmann](#)

Sent: Saturday, January 04, 2014 11:27 AM

To: SHansen@cityofacramento.org

Subject: McKinley Village

Dear sir,

First, I would thank you for holding a forum at the B Street Theater. I am a 14+ years resident of New Era Park and have specific concerns about the proposed McKinley Village project.

1. Traffic increases on the west side, on 28th Street, will be tremendous. Walking to the dog park at Sutter's Landing requires walking up 28th Street to the RR crossing where there is no sidewalk, very little shoulder and a steep drop to the B Street Theater building. Increasing the traffic flow here would make this a dangerous place to walk with grandchildren and dogs.
2. Caltrans has announced plans to close the E Street on ramp to east-bound Business 80. This closure will require traveling through more of the neighborhood along the 29-30th Streets corridors in order to get access for crossing the American River. Adding thousands more to the already heavily impacted freeway will only add to the gridlock.

Sincerely,

Ellen Hoffmann

215 25th Street Apt A

Sacramento, CA 95816

*Carolina Sanchez Esparza
28 16 C Street
Sacramento, CA 95816*

January 6, 2014

Dana Allen, Associate Planner
City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Dana Allen:

This letter is to voice my concern regarding the McKinley Village Project. I was born and raised in Mid-town and have lived on C Street since 1993. My parents have lived in their home on 28th and E streets since 1967. Currently, when we pick up our children after work from our parents' home (between 4:30-5:30pm), it can on occasions take us several minutes to back out of their driveway due to the amount of traffic turning north to 28th Street. The McKinley Village Project will only add to our frustration, due to the additional 1800 cars that will use A Street to access McKinley Village. Also, our children walk to my parents' home after school. We have witnessed many cars carelessly running through stop signs and ignoring pedestrian crossings in our neighborhood. The additional traffic the McKinley Village Project will add to the neighborhood will cause additional safety issues for pedestrians, bicyclists & skateboarders.

Keeping the A Street Bridge as a pedestrian/bicycle access and adding car access via Alhambra Boulevard will help cut down on the amount of traffic on 28th Street and C Street.

I am also concerned about the impact to Sutter's Landing Park and the effect on wildlife. I enjoy being in my yard or house and being able to hear the hawks call out. The McKinley Village site currently offers foraging habitat for Swainson Hawks and other raptors, which would no longer be available. It does not explain adequately how the project will compensate for the loss of habitat for the Swainson Hawks and other raptors.

Perhaps lowering the amount of homes to be built, adding a "green belt" area, keeping the A Street Bridge as a pedestrian/bicycle access, and providing car access via Alhambra Boulevard for the McKinley Village access may help with my concerns and those of other Mid-Town/East Sac residents.

Thank you,


Carolina S. Esparza

cc: shansen@cityofsacramento.org

H-7-14

I oppose ideas for a resident development in the McKinley Village area. This area has no access, and now you state that there can be only one access point, sending all traffic into one area. This area is better suited for industrial or office use during the weekdays and not on weekends. Who would want to buy property located next to a freeway, then surrounded by a rail line? Go look somewhere else. I point out an accident with photos from Nov 13, 2013....showing cars speeding through neighborhood which happens too much, now you want to introduce more people who will want to take short cuts through our quiet area.

Tell me how does a car roll over in photo at a blind intersection when speed should be zero---10 mph? that is because people are rushing through the neighborhood and not caring about anyone but themselves! Have you seen the traffic stalls at Alhambra Blvd/McKinley Blvd, 28th street, etc. at 3—5 pm in eve?

Have you been held up with Elvis Blvd/St. Francis Girls school traffic? Is there no public transport or better ideas to solve these problems, now you want to introduce more cars? Need housing? That is what the world in sacramento needs, try downtown, that nice piece of property at 3/L street, how about a high rise condo units? Surely something marketable could be built there for small family housing.

Back here in McKinley Park area, the Canteen Corp is a nice neighbor, you never see or hear about them, they come and go from 6am---3pm, then they close up. A car storage lot(self storage, campers, boats) park, business park would be great in this old farm land, but you need 2 entries, and cut it in half, so people can not cut through. Again who would want to live circled in by rail and car pollution? Would Pope, Pane or Miller want to live there? Can you imagine all the daily visits by babysitters, handymen, window washers, UPS trucks, gardeners.....etc, all using one entry point?

If you can not make 2 openings as you first said there would be, I would move to the idea of a park there, with no car entrance, people park outside and walk in and bike, take their pets.

FIRST you said 2 ACCESS DRIVES, ...
NOW ONE, NOT ACCEPTABLE
ARE YOU GOING TO KEEP CHANGING
THE RULES ... ?

ride my bike downtown, stroll the streets recalling better times in 1960's---80's. hoping things will return downtown. I use to go by bus from River park and shop K street and go to movies as a teen. I would like to see a program set up to get people to go downtown, and give them a reason to do so! A basketball arena is not answer. Surely some city planners in Europe or elsewhere can design some ideas that will bring people downtown. I shop downtown as much as possible and still go there to see a movie. Maybe some housing, parks, shopping and events can bring people there....why not some housing instead of McKinley village. Give those who work downtown some housing so they can live near work and keep cars off street during the weekdays.

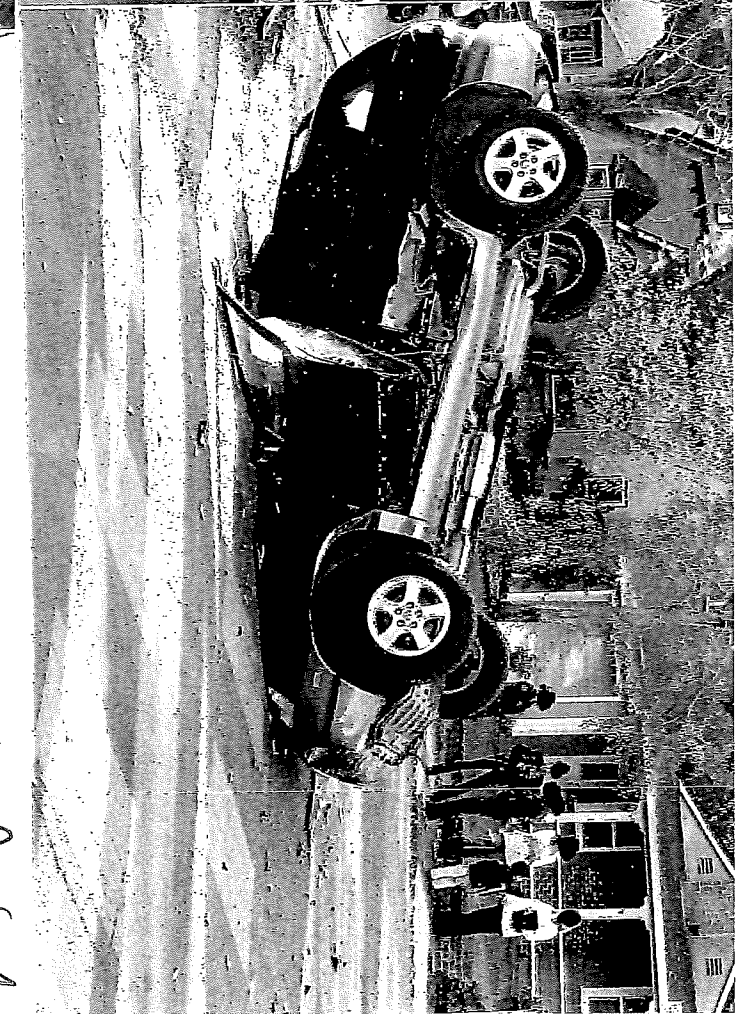
I realize my vote is worthless but I am expressing my view...I do not see a successful housing dev in McKinley Village....I would not live there. I would much rather live downtown, and there is surely many buildings and land needing restoration down there. I walked home from Amtrak one Sunday night Nov 2? Too late 11 pm to get a bus,so did the city walk down J street to my house on San Antonio way....it was cold and no one was out, only street people and cops....oh a few people coming out of the bars, just a couple. I never realized this town just shuts down and is so quiet at 11 pm. Just an observation. I grew up in River Park, went to college in Bay area, and now live around the corner from my grandfather's house, which I use to visit on my bike as a teen. It is a nice neighborhood and care should be given so as not to ruin things. Bringing I-5 right through downtown Sacramento was a mistake, it should have been put west of West Sacramento...I hope more mistakes are not made.

The McKinley Village parcel is good for something, it should not just sit idle...agreed; but housing would be a mistake. Doug Pope made his living working for a developer, so naturally he would like to see things go upward in this area.

If a vote takes place and somebody is really interested in what Sacramento natives feel, then call me up! Sincerely, Michael Ragusa PO Box 19151, Sac, Ca. 95819 tel 731-8090

Mike

close executive Airport... And Build housing there, make A new private small Airport somewhere else. How many people use EXECUTIVE Airport?



How can you turn a
car upside down?

2 cars w/ bodies in
cars most likely
pushing to school
8 AM

36th way / 5th Avenue
way

NOV 13 2013

We get speeding state
workers heading to
convey + parents
to Theo. Jvd. school,
great! ?

Ms. Allen, Mr. Cohn--

I'm writing with a follow-up comment to my earlier letter of objection about McKinley Village. During our drive home from work yesterday at 6:30 p.m. (we carpooled), I was reminded yet again by how badly we need relief from car traffic in East Sacramento.

For over 30 minutes, I watched car traffic nearly bring Folsom Blvd between 65th Street and 45th Street to a stop. Cars stood in line in the roadway trying to turn in and out of parking lots. Cars backed up in the roadway to swerve around them. People honked their horns, made rude gestures at each other. Then, saddest of all, I watched a line of cars turn right out of Trader Joe's to detour to pedestrian-friendly M street for their highway, because Folsom Blvd was too congested to drive on.

Please, we don't need more cars in East Sac. They are already eating away at our quality of life.

Amy Anderson
1321 40th Street, Sacramento

Ms. Allen & Mr. Cohn:

I'm writing to express my opposition to the proposed McKinley Village housing development as designed.

The project is a car-oriented -- not a pedestrian-oriented -- development, and it will bring increased and harmful vehicle traffic to the supporting streets around it. The budding pedestrian nature of existing Midtown and East Sacramento neighborhoods should be valued, not threatened. Any sensible urban planner or architecture student should be well versed in the preciousness of walkable communities, even more so considering how very difficult they are to produce. Long before Jane Jacobs wrote her treatises that inspired New Urbanism, common sense taught people that walkable communities with a mix of commercial, artistic, and residential structures are livable, compelling communities. Adding more cars and requiring residents to drive even further to reach amenities will severely and irrevocably harm the area. Sacramento should be protecting one of its most valuable resources and expanding upon its recent successes, not endangering it and them.

The streets that would shuttle cars into the McKinley Village development are already over-taxed by cars; additional traffic would make them unpleasant and inhospitable to the types of new businesses and culture that have started to take root in our area. While I love riding my bike instead of driving my car, recent traffic increases have made many nearby roads congested, intimidating, and dangerous, making even simple errands a hassle unless done during the few non-congested times of day. I regularly hear people from tract-house communities in Natomas and West Sacramento express that they wished they lived in an area where they would walk to amenities. I've never heard anyone mention they wanted to live in an area where they could drive more, where they could sit in traffic more, where they could dodge more vehicles, inhale more exhaust, or navigate more parking lots. Your decision on McKinley Village can make the difference between encouraging a budding community and creating yet another block of houses besieged by traffic, isolation, and sterility.

Sacramento is long overdue to shine as the state capitol. It should look to cities that have succeeded in urban transformation -- like Portland, OR and Boulder, CO -- for how to do this. Strategies like reducing car-fed projects, supporting walkable communities with a mix of commercial and residential amenities, funding safe, clean, convenient public transportation -- all of these the items are well known and well proved recipes for urban success, and McKinley Village does absolutely none of them. Instead, it compounds the problem that so often, and so-unnecessarily makes Sacramento lackluster. Our city is blessed with a great climate, easy access to San Francisco, Lake Tahoe, the riches of Napa & Sonoma valleys, and proximity to world-class education in both Davis and Berkeley. We should be doing far better as a city. And we are not, in good part, because tract housing suppresses vitality.

Please help protect our community. Please help Sacramento grow into something that we -- and California -- can be proud of. Please help stop McKinley Village and set the precedent that new development must be quality development.

Amy Anderson

1321 40th Street, Sacramento

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

From: cozes53027@mypacks.net [mailto:cozes53027@mypacks.net]

Sent: Tuesday, January 07, 2014 10:32 AM

To: Planning

Subject: McKinley Village EIR Comments

January 7, 2014

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

Re: McKinley Village

Dear Mr. Buford,

I have the following comments on the McKinley Village Project Environmental Impact Report.

1) The health risk analysis for this project shows that the residences located closest to Business 80 will face an increased risk of 120 cancer cases per million. Typically, the health risk threshold used by air districts throughout California equals an increased health risk of 10 in 1 million, not 276 in 1 million as used in the EIR. Accordingly, an increased risk of 120 per million should be considered a significant and unavoidable health risk impact.

2) Even assuming that 276 in 1 million were an appropriate threshold for the carcinogenic health risk threshold (which it is not as described in comment 1 above), the project's actual carcinogenic health risks would exceed that level. This is because the calculations used in the health risk assessment are estimated using an old, outdated procedure. The McKinley Village EIR uses calculations from 2003 guidance that was updated by the California Office of Environmental Health Hazard Assessment in 2012. The McKinley Village EIR health risk calculations do not account for child risk factors and associated differences in daily breathing rates that vary by age. When these factors are accounted for in the calculations, the carcinogenic health risks at the closest receptors would increase substantially, resulting in health risks well above the 276 per million and the 10 per million thresholds. The McKinley Village Project would clearly expose the closest residences to health risks that are significant and unavoidable.

Sincerely,

Fred Glickstein
2957 "C" Street
Sacramento, CA

Dana Allen

From: Kathy Kayner <kathy.kayner@gmail.com>
Sent: Tuesday, January 07, 2014 4:03 PM
To: Dana Allen
Cc: Marshall New Era
Subject: DEIR (McKinley Village Project)

Good afternoon.

I am a resident of 24th and C Street and an admirer and user of Sutter's Landing Park. I wish to address my personal concerns about the traffic issues on C Street as well as the ingress and egress of Sutter's Landing Park.

Yesterday, I took a walk from my home to SLP. As I was walking eastbound on C Street, I noticed several vehicles exceeding the 30 mile per hour speed limit. I also noticed City trucks, Southern Pacific Railroad trucks and private vehicles exceeding the 15 mile per hour limit as they were entering and leaving SLP.

With the current traffic the way it is, I am concerned that vehicles coming out or going in on A Street would be a hazard to pedestrians and bicyclists. Please be aware, because there is a dog park, not every dog owner drives their dogs to it. They walk their dogs there as well. I am also concerned about the increased traffic on C Street from the vehicles of McKinley Village. There is a private school (Courtyard School) right off 24th and C Street. Parents do not just drop their children off right at the school. They sometimes have to park to the south of 24th Street and walk their children to the school. Additional traffic coupled with speeding, is very hazardous in this area.

If there must be an ingress/egress from McKinley Village, I respectfully ask that the City reconsider not having traffic coming out or going in via 28th Street...period. It was mentioned in the last meeting that drivers are ignoring the DO NOT ENTER signs for westbound traffic at D and E Street. That is another concern that should be addressed.

From a safety standpoint, it makes better sense to have traffic coming out via Alhambra Blvd.

If McKinley Village is approved, I am very concerned about the impacts to the wildlife at Sutter's Landing Park and the area where the MVP is being considered. I noticed several references to "Threatened Species" mentioned in the DEIR. Shouldn't the City be concerned that these "Threatened Species" will eventually become "Endangered Species" if we take away their habitat and foraging areas? Is revenue for the City that important that it could harm not only the wildlife but the plant life that support the wildlife?

If and when construction begins, where will the construction equipment enter and exit the area? Is the developer considering using 28th Street to A to bring heavy equipment into the area? Where will storage of construction materials, equipment etc be stored? At Sutter's Landing Park? At what area of the park will these items be stored? Will the developer be prepared to pay for mitigation of any toxic spills or waste from stored materials?

Thank you in advance for taking the time to read this email and for kindly considering my concerns and questions.

Kathy Kayner

Dana Allen

From: Wehr, Kevin <kwehr@csus.edu>
Sent: Tuesday, January 07, 2014 5:45 PM
To: Wehr, Kevin
Cc: Dana Allen; Steve Hansen; Steve Cohn
Subject: Re: comments on draft EIR for McKinley Village Project

Forgive my follow-up email, but another point arises from today's Sac Bee, <http://www.sacbee.com/2014/01/07/6050449/drought-prompts-deep-cuts-in-american.html>.

The San Juan water district plans will this week decide whether to declare " "Stage 5" drought restrictions would ban all outdoor watering, prohibit water from being used for construction activities, **ban new connections to the water system**, and call on customers to reduce indoor water use by 50 percent." article goes on to state "The city of Sacramento is expected to consider similar measures later this month."

One has to wonder, given this third year of scarce water and lowest precipitation year in history, whether there even be enough water to feed this new development, if the area's governance boards are considering banning new connections to local water systems.

Cheers,
Kevin

Kevin Wehr
2014 C Street
Assoc. Prof. of Sociology
CSU Sacramento

On Jan 7, 2014, at 4:28 PM, Kevin Wehr wrote:

Dear Dana Allen, Steve Hansen, and Steve Cohn,

I am writing to you to express my serious concerns regarding the draft Environmental Impact Report on the McKinley Village Project.

Let me begin by saying that I oppose this project on a number of grounds, not limited to my comments on the draft EIR. I believe that this is an ill-conceived project that will have severe impacts on the quality of life in my neighborhood and nearby neighborhoods. First, I do not believe that the project can be economically feasible. I doubt very much that people will be willing to pay the asking prices for homes that do not have adequate access to public transportation and which are sandwiched between a major Interstate highway and a major freight rail line. Additionally, I believe that there are environmental risks involved as there is inadequate drainage in the area, which is essentially a bathtub without a drain. I know pumps will be installed--that they are willing to do this demonstrates to me how misguided the project is. Lastly, I am a believer in in-fill development, but that is not really what this is. This is a brand new development that will require large commitments to building or re-building infrastructure, will impact our local schools (one of which was just closed), effect the efficiency of our already-strained emergency responders, and increase traffic and noise. All of these costs are disproportionately focussed on two neighborhoods--midtown and east sacramento. To my mind, true in-fill development is distributed across open lots sprinkled around the city. If the equivalent number of homes were built on open

lots around midtown and elsewhere, the costs and impacts would also be distributed and such a project would have my full support (indeed, two such projects have been built within a block of my residence). Instead, the developer is asking two neighborhoods to bare the burden of this new development. The point has been made that it is better to do this than to pave over farm fields, but I guarantee you that this is not a zero-sum game. The farm fields will be paved over in due course, regardless of whether this project moves forward. These are the reasons I vehemently oppose this project.

With that said, I would like to discuss the impacts on the neighborhood and the proposed mitigations offered in the draft EIR. The traffic impacts on C street and 28th street will be extreme. C street is already a "sacrifice street" for the neighborhood, with a level of service C as compared to A for all other streets. We carry truck traffic to the Bell Marine recyclers, Blue Diamond, and random other tractor-trailer traffic as the street was designated a "truck route" in the middle 1980s. It is the only street in north midtown (between B street and J street) where traffic can proceed unhindered by diversions, circles, or other calming measures. Traffic during rush hour is barely tolerable, and the addition of some 1800 vehicle trips with some large percentage headed to downtown would make life and work here very difficult indeed, and move C street to level of service F--the highest possible. I work from home at least three days a week, and I chose to live on C street, not J street. The two parks on C street (Grant and Stanford) get a great deal of use, both by organized and informal sports groups as well as Courtyard School physical education. I see several balls bounce across the street in front of cars every day. Adding increased traffic vastly increases the likelihood of an accident--to me it would become not a matter of "if" but "when." All of these concerns are amplified for the several parks at Sutter's Landing. In short, Regardless of CEQA, the City General Plan Goal M 4.3 is that "wherever possible" the City shall "improve development applications in such a manner as to reduce high traffic flows within residential neighborhoods." The City has a responsibility to achieve this goal by either rejecting this proposed development or at minimum addressing the impact of the McKinley Village project on traffic flows along C Street.

If the project must move forward, the only mitigation that I can imagine working would be to abandon the proposed exit from McKinley Village at 28th and to route traffic onto 30th or Alhambra under the railroad tracks. The existing bridge over Business 80 could be used nearly as-is for bicycle and pedestrian traffic, which is a much more friendly fit for entry into midtown, parks, and etc as compared to the proposed bike tunnel at Alhambra. I understand that such a change depends on the good will of Union Pacific, and is more costly to the developer. But the costs to the developer must not trump the costs to the neighborhood, your constituents.

Barring such a change, the mitigation for C street and 28th street needs to be seriously reconsidered. At minimum there must be undulations and traffic circles added at regular intervals (and especially near the bike path entry) to C street in order to slow traffic down. Stops signs would need to be installed at a minimum for the intersections at C and 22nd and C and 27th near the parks--even better would to add them also at 24th and 26th--to slow traffic and encourage the use of alternate routes and public transit. The speed limit needs to be reduced to 25mph and strictly enforced. This would need to be in conjunction with re-routing traffic leaving the development and coming south down the railroad berm by installing a no-right-turn partial closure of C street. This would at least force traffic to disperse through the neighborhood rather than having C street bare the brunt of the traffic leaving the development.

These are my initial thoughts. Thank you for your time and attention to this matter of great importance to my community.

Regards,

Kevin Wehr
2014 C Street
Assoc. Prof. of Sociology
CSU Sacramento

Ellen Trescott
2014 C Street
Sacramento, CA 95811
eltrescott@hotmail.com
(916) 873-2020

VIA E-MAIL

January 7, 2013

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
dallen@cityofsacramento.org

Re: Comments on the Draft EIR for the McKinley Village Project (P08-086)

Dear Dana,

Please accept these comments on the Draft Environmental Impact Report (DEIR) for the McKinley Village Project (Project). I am a resident of the Boulevard Park neighborhood in midtown Sacramento, and I have a background in land use and environmental law. With due respect, the City's planning process for this Project has been very frustrating for the residents of my neighborhood, who would receive no benefit from the Project but would shoulder most of the Project's traffic burden. The willingness of the City and the Applicant to attend community meetings has not translated into any meaningful attempt to address the concerns of our community, and this is reflected in the DEIR.

The majority of Project traffic would empty onto 28th and C Streets, the *only* two streets near the Project that currently operate at an impaired level of traffic service.¹ To address the Project's disproportionate effect on these already-impaired local streets, we asked that the EIR, and the City, conduct a thorough analysis on the following two subjects, desired by a majority of residents in our community: (1) a detailed financial and engineering assessment of the feasibility of routing Project traffic onto 30th Street or Alhambra Boulevard in East Sacramento, where the Project would be located, rather than onto 28th and C Streets in midtown; and (2) the feasibility of implementing specifically requested traffic mitigation measures: (a) routing Project traffic onto B and 29th Streets rather than onto C and 28th Streets; and (b) installing traffic calming devices on C and 28th Streets.

¹ DEIR p. 4.9-24 (28th Street between C and E Streets, and C Street west of 28th Street, are the only two street segments affected by the Project that operate at LOS "C" rather than LOS "A").

The EIR gives short shrift to these request.² It misrepresents the traffic patterns in our neighborhood, and it underestimates the Project's impacts on local traffic and on pedestrian and bicyclist safety. The Applicant has so far refused to offer to install or pay for *any* traffic controls to address the Project's impacts on C and 28th Streets, and has instead deferred those improvements (and their funding) to the City.³ Our community deserves better.

The DEIR grossly underestimates Project traffic on C Street. It predicts that only 4 to 5 percent of vehicles coming and going from the Project would use C Street, while over 40 percent would use 28th Street.⁴ There is absolutely no basis for this assumption. Currently, both C Street and 28th Street carry similar amounts of traffic.⁵ Both are impaired in their level of traffic service, as the only local streets with a current LOS "C" classification rather than LOS "A." The DEIR makes broad characterizations about all "east-west local streets between C Street and I Street," suggesting that all such streets are similar.⁶ The DEIR concludes that traffic is limited on these streets, not only due to half-street closures on some streets but also due to "the lack of one-way streets, presence of multiple stop controlled intersections, and the presence of traffic circles," which help maintain "relatively low travel speeds on these roadways."⁷

As noted in the DEIR, C Street has no half street closure. Moreover, it has very few stop signs, and no traffic circles or other traffic control devices. It is common for vehicles to travel at high speeds on C Street because there are fairly few impediments to control traffic. In fact, the DEIR shows that *twice as many commuters* use 28th Street to get to C Street than to get to H Street in order to travel to job centers downtown.⁸ There is no reason to believe that Project traffic will behave any differently. The DEIR's conclusion that the Project will create minimal traffic on C Street is unsupportable.

² The DEIR does not even consider a Project alternative that would involve site access from 30th or Alhambra, nor does it provide any concrete analysis of why such an alternative is infeasible.

³ See DEIR p. 4.9-94 ("The City should monitor 28th Street traffic volumes after construction of the project to determine if a half street closure is necessary at the C/28th Street intersection,... diverting traffic onto C Street (eastbound), where drivers would then continue southbound on 29th Street. ... B Street provides a connection between 28th and 29th Street, [but] is a less suitable location for a half street closure... [and] currently lacks standard improvements...")

⁴ DEIR Figures 4.9-7 and 4.9-8.

⁵ DEIR pp. 4.9-24, Table 4.9-4 (28th Street between C and E Street current sees 3,850 vehicles per day, while C Street west of 28th Street sees 3,640 vehicles per day); DEIR Figure 4.9-6 (traffic data for the intersection of C and 28th show similar levels of total traffic on both streets)

⁶ DEIR p. 4.9-40.

⁷ *Ibid.*

⁸ DEIR Figure 4.9-6, (traffic data for intersection of E Street at 28th, westbound turns and north- and southbound traffic).

The City's General Plan contains Goal M 4.3 and Policy M 4.3.1,
Neighborhood Traffic:

"The City shall continue wherever possible to design streets and improve development applications in such a manner as to reduce high traffic flows and parking problems within residential neighborhoods."

The City Planning Commission and City Council should adopt Project conditions that will ensure compliance with this goal and policy, and avoid adverse impacts on local midtown residents who live on already-impaired streets in residential neighborhoods. The City should ideally require a detailed study and proof that 30th Street or Alhambra Boulevard cannot be accessed by the Project. If A Street is used for Project access, the following conditions should be required:

- For outbound Project traffic: The Applicant should construct and/or fund two half-street closures, one on 28th at B (southbound), and one on C at 29th (westbound), to direct Project traffic east onto B Street then south on 29th Street. This would prevent Project traffic from travelling westbound on C or southbound on 28th, the two neighborhood street segments that currently suffer from LOS "C" traffic conditions;

Alternatively, two half-street closures should be required at the intersection of C and 28th Streets, to prevent Project traffic from travelling westbound on C or southbound on 28th Street. The first alternative is preferable because it would only affect Project traffic, and would not adversely affect the residences on C Street between 28th and 29th.

- For inbound Project traffic: The Applicant should construct and/or fund traffic controls on C Street and 28th Street, including additional stop signs, undulations, traffic circles, and bike lanes;

Additionally, 29th Street should be converted to a 2-way street between B and D Streets (and possibly between D and E streets, with a median to separate it from the E-Street off ramp), to allow for inbound vehicular Project access on streets other than C and 28th.

Thank you for giving your sincere consideration to the concerns of midtown neighborhoods.

Sincerely,


Ellen Trescott

Dana Allen

From: Dale Kooyman <kooyman801@gmail.com>
Sent: Tuesday, January 07, 2014 7:45 PM
To: Dana Allen
Cc: Steve Hansen; Consuelo Hernandez
Subject: McKinley Village EIR comments
Attachments: O_McKinley Village Project Title Table.pdf; 049Transportation and Circulation.pdf; Kings' arena DEIR excerpt.doc

Various individuals asked me to edit, proof and organize their comments into a single composite document and submit to city staff for the subject EIR. By this email I am forwarding a summary of all their and my comments to you. Some comments may reflect duplicate concerns. (There may also be typos I made or missed and other errors---please call me--443-5543--if clarification is needed. These concerns and comments result from commenters having attended Councilman Hansen's Community meeting of December 11, 2013 meeting at the B Street theater.

Please confirm by return mail that you received these comments. Your IT staff have instituted a system where lengthy emails with attachments and numerous cc's to the city are sometimes considered spam. Thanks.

1. Please refer to attachments, Alhambra Charette McKinley, Transportation and Kings Arena DEIR excerpt.
2. The Alhambra Transportation Charette is the only multi-stakeholder visioning exercise ever done for the Alhambra Corridor. It has withstood the test of time, and must be considered the foundation of the current EIR for any further planning efforts, including this version of McKinley Village.
3. **In view of the fact former Planning Director Gary Stonehouse was there presiding at one of the large round-tables, the Planning and Development Department should not only have copies of the Charette but should be following its guidelines for the corridor, including the McKinley Village as it did previously. The same applies to the Transportation Department as it followed such guidelines previously. (both see #9)**
A few short years ago Walgreens representatives submitted a proposal to build a drugstore within the same block as the Mayflower restaurant. Yet, in the **Hansen meeting**, there was **no reference** to that **future development** and its possible traffic and other impacts. **Evaluating and applying the charette contents and guidelines are major omissions. Those omissions must be corrected as well as projected traffic impacts resulting from the McKinley Village project and included in the final EIR.**
4. Developer Sotiri Kolokotronis, Brian Holloway and Bruce Starkwether members **Development Oversight Commission (DOC)**, Consultant **Wendy Hoyt, Max Fernandez and Ed Cox** were also Charette participants. Absent a copy of the sign in sheet, we do not have the names of transportation employees. **All supported and agreed with the results** as well as contributed ideas and suggestions for adoption--one of which is a mini-street car line down Alhambra.
5. The charette reflects a lot of concern, even then, about the **cumulative** impacts associated with the possible relocation of the Greek Orthodox church to Centrage and redevelopment of that property along with the large development project bounded by C & D being proposed for Alhambra--30th St. There was no reference to this project at the meeting also. Under consideration was the possible dense residential project at Eppie's site and Vagabond Inn at N st.

The charrette also resulted from recognition that the history of city Planning and Transportation staff's planning new suburban neighborhoods treated Central City streets far differently. For the former, staff meticulously created a street hierarchy classification of a. **local** (residential with very low traffic volumes and speed limits), b. **collector** (somewhat higher volumes and speed limits) and c. **expressways** (highest volumes and speed limits).

Hard fought as it was to achieve, only by installation of traffic calming measures commonly accepted in other inner cities and conversion of one-way streets to two-way did the city modify its long standing practice of lumping all Central City streets together to promote expressway speeds and volume. The single purpose was to move commuter traffic out-of and into the Central City with maximum efficiency.

With no regard for land use along those streets such as schools, churches and residential, the practice resulted in PD ticketing speeders at an average of 62 mph. Such speeds not only claimed adult, child and animals' lives but resulting vehicle accidents severely damaged residents' homes, cars and personal property--not to mention costs to PD, Fire, Ambulance.

In the absence of constructing the Sutter Landing Parkway as a primary driver access route, if that is the case as Hansen said, neither Planning nor Transportation staffs' presentations and answers to questions at the community meeting were adequate. They did not clearly show how they specifically and meticulously plan to protect pedestrian street safety and quality of life for impacted residents, their children and their visitors. Instead, it appeared that staff were planning to allow future McKinley residents **and** future added commuter traffic from points east unimpeded access. Only treatments for C and D streets were mentioned as "possible" and impacts to the rest omitted, if not ignored---i.e. **cumulative** impacts to all streets in the coming years! Answers to problems participants posed and proposed protections must be included in the final EIR.

6. The contents of the Alhambra Charette should be taken into consideration when completing the EIR for the McKinley Village Project. It was a joint city staff, East Sacramento and Midtown effort done to lay out a future path for the Angelo Tskopoulos's Greek Church Centrage project. (See #9 below.) In terms of the transportation circulation needed to facilitate the McKinley Village, these projects are identical.

7. The city has actually accelerated infill development while still ignoring the inadequacy of the existing infrastructure and negative impacts that a project may have on adjacent business and residential neighborhoods. The Arena is an example of how flawed the city's development philosophy has become. If the existing storm drainage system can't handle the added volume of waste, then build a huge concrete retention basin under a building to temporarily store excess. And if the existing sewage system can't handle 500 Arena toilets flushing in unison, build a massive concrete sump under the building and then gradually pump it out so as not to overload the city's inadequate system.

8. This is also the approach the City has taken with McKinley Village, so that the anticipated sewage waste load increases do not overwhelm the antiquated sewer and storm drainage systems they would be connected to. The City simply required the developer to provide a sub-grade storm drain retention basin and a sub-grade sewage sump. What is particularly offensive is that the McKinley Village developer then promoted the basin and sump as their special gift to the City at great expense to themselves.

9. One accomplishment from the Charrette was the **2-way conversion of J Street between Alhambra and 30th Street**. It relieved congestion and provided access to the Northbound Fwy Business 80 onramp. That **would not have happened without including this Alhambra Charrette results in the Central City Two-Way Conversion Study process**. This shows that visioning exercises like this Charrette, provide considerable value over time. **Traffic should have record of this**. This change also shows the Charette was not an idle effort--it did and still does have project development and traffic circulation meaning.

10. The consultant that arena developers commissioned to prepare its DEIR gave reasons why its construction and operation would have no negative traffic impacts on surrounding business and residential streets. One important given that supported the consultant's findings was the completed **construction of the**

Sutter Landing Parkway stretching from the Capital City Freeway on the east to 16th Street on the west with on and off ramps as needed. It is known that in the very near future Caltrans plans to close the E Street freeway ramps for merging and other safety reasons.

"McKinley Village Project November 2013 049 Transportation and Circulation pdf page 2

- *The traffic analysis should consider Caltrans' proposed closure of the E Street on-ramp to the Capital City Freeway (Business 80).*

- *The traffic analysis should consider the construction of Sutter's Landing Parkway."*

This SLP connection was heralded for years as being the **"new gateway to Downtown"** to provide drivers a badly needed alternative to **stop-and-go Central City residential streets and entrance and exit from congested #160**. The SLP would provide quicker vehicular access to retail stores, other businesses, restaurants, various entertainment and performance venues, visitors, tourists, conventioners, jurors, private and government employees driving from the east to arrive at their destinations. **Quicker access would spur additional office development and encourage new businesses to locate in and adjacent to the CBD and in the Railroad Yards area**. From an **air quality** perspective, the end result would be **less vehicular exhaust emissions into Central City's air**--long one of the most heavily concentrated polluted areas in the entire city.

The business owners to the adjacent west of 16th across from Downtown Ford told its customers (many of whom lived in the Central City that the city was forcing them to move and property owners to destroy the buildings they were in to make way for construction of the *Sutter Landing Parkway*--SLP (called last phase of the *Richards Connector* at that time.) The land lies in wait, vacant to this day.

11. The Kings' arena DEIR excerpt in the third attachment shows the consultant relied on information in the city's *General Plan* and *Sacramento Area Council of Governments Plan - SACOG*) "to support the Technical Analysis." Both plans contain the *Sutter Landing Parkway*. **Reference to these was also omitted in the community meeting and must contained in the city's EIR.**

The SLP has also been in the Traffic Department's *Transportation Programming Guide's* Table A-1 *Major Street Projects* for over 12 years with varying ranks of priority. The city's 2012/13 TMG guide and ranking has not been finalized however. Yet, CM Hansen at the community meeting said that constructing the SLP was not practical. Transportation staff did not correct him. Is CM Hansen correct?

If so, the failure to timely build this major artery would then invalidate the DEIR's findings as well as eliminate long standing plans for vehicular access to CBD and RRY. It would also **discourage building** offices and businesses locating in the RRY. This is deceptive and conflicting information. These conflicts in prior findings and current conclusions must be resolved in the city's EIR. The EIR must reveal what happened that the SLP, which was once promoted as needed for CBD and RRY to develop and prosper, is now, per CM Hansen's statement, considered unnecessary. If it is simply concluding the five fold cost increase makes it impracticable, then that is not acceptable and consistent reasoning. It is also inconsistent with the reasoning for

constructing past and future transportation artery costs elsewhere because expenditures for such construction have always been and will in the future be justified with "public's greater good" and "the city's long term economic benefits will pay for the construction." Current costly examples are the proposed bridges across the river from/to Sacramento and from/to West Sacramento---very costly but we are told those will be done for the "greater public's good" and "added economic benefits to the city of Sacramento." Fifth and Sixth Street bridges over the rail tracks have also been costly and they only serve connecting I-5, already heavily impacted with more traffic expected. The new developer of rail-yards is quoted in recent BEE article as saying he does not expect the previously approved "**12,000 residential units will ever be built.**" This means more employees of that development area will be commuters who live outside the Central City--with no major access from the huge residential areas east of the city and county unless the SLP is constructed.

12. Traffic impacts on C and 28th were referenced in the group discussion and some talk about mitigating those impacts. However, drivers are known to switch or take differing streets after a "trial and error" period once an infill project is built out. These driver behavioral changes are often related to perceived or actual volumes of fellow vehicles encountered en-route to various destinations. Consequently those streets are not the only streets that will be seriously impacted. In fact, **E, F, G, H and I** Streets will also become through routes both directions for many drivers, depending on days, nights and time of day or night. In addition, traffic largely unrelated to the project (Midtown retail customers, other business customers, theater goers, bar/club customers, etc.) will also increase as it has been annually, year after year as population density elsewhere increases and the number of jobs increase in the Central City.

Therefore, in order for the EIR to be complete and equitable for all residents, it must include a comprehensive analysis of traffic circulation and patterns of those drivers' movement related to days and time. All are necessary to determine **cumulative** impacts also. This information will make it possible to create needed mitigation measures to address such impacts on those streets, like more stop signs, traffic circles, speed reducing techniques and/or methods to divert traffic to the thru streets. such as Alhambra, 29th Street and J Street.

Dale Kooyman, 801 21st Street Sacramento, CA 95811

McKinley Village Project (P08-806)

Draft Environmental Impact Report

State Clearinghouse Number: SCH 2008082049



PREPARED BY:

DUDEK

980 9th Street, Suite 1750
Sacramento, CA 95814

Date Completed: November 2013

PREPARED FOR:

City of
SACRAMENTO

Community Development Department
Environmental Planning Services
300 Richards Boulevard, 3rd Floor
Sacramento, CA 95811

Kings' arena DEIR excerpt which shows the consultant relied on information in the city's General Plan and Sacramento Area Council of Governments (SACOG) "to support the Technical Analysis." Both contain the Sutter Landing Parkway

Introduction

The City received a variety of transportation-related comments on the NOP. Many of these comments pertained to potential project effects on various intersections, freeways, and neighborhood streets. Comments also related to the potential impacts to bicycle and pedestrian facilities, parking, and overall circulation. Other comments related to transit system issues including ridership and station loading capacity (both light rail and bus service). Comments were made regarding effects of simultaneous special events occurring in downtown Sacramento and West Sacramento. To the extent these comments related to the project's potential effects on transportation, they are evaluated in this chapter.

This chapter relies on a variety of data sources and/or publicly available information to support the technical analysis. This information includes, but is not limited, to:

- Data from the 2030 City of Sacramento General Plan;
- Data from the Sacramento Area Council of Governments (SACOG) including travel model data from its 2035 MTP/SCS travel demand model;
- Data from The Sacramento Kings Organization on characteristics of the Entertainment and Sports Center (ESC) and Non-ESC land uses that comprise the project;
- Data from JMA Ventures on existing uses and occupancy levels at the Downtown Plaza uses;
- Travel behavior data collected in 2012 at Sacramento Kings games played at Sleep Train Arena in Natomas; and
- Data provided by public agencies including City of Sacramento, Caltrans, Sacramento Regional Transit (RT), and the Yolo County Transportation District (YCTD).

Donna Pozzi & Henrik Jul Hansen
2509 E Street
Sacramento, CA 95816
916-443-3359
donnapozzi@gmail.com
December 7, 2013

Council Member Hansen
915 I Street
Sacramento, CA 95814

Dear Council Member Hansen:

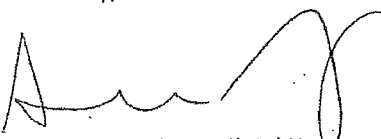
We are long-time residents and homeowners in mid-town and are writing to express our concern about the McKinley Village project. Our specific concern is about the increased traffic that will negatively impact our neighborhood. We own a house on C Street and live on E Street. Both of these streets will experience significant increases in traffic due to this project as currently planned.

Moving to C Street more than 30 years ago, the traffic was terrible due to the garbage trucks going to the landfill. We were promised that the landfill would soon close and while it took much longer and many fights to get it actually closed and turned into a park, it was worth it because the traffic decreased and the neighborhood became more livable and stable. When C Street was closed at the Blue Diamond plant, it got even better. Likewise, E Street was an extremely busy street with cars speeding by especially during commute times. We bought this house because of a promised traffic plan that again took years and fighting to implement. The traffic calming plan finally made E Street peaceful. So we know about traffic!

The proposed McKinley Village project has not adequately addressed traffic in the EIR. It was tortuous but I read it! The traffic studies that have been done don't examine impacts such as westbound on F and G Streets. Undoubtedly there will be more traffic on E Street as well. And the increase in C Street traffic will severely degrade the quality of life for people living there. This is not an affluent area. Most people are like we were when we bought our first house on C Street, which had been redlined by lending institutions for years. The addition of an access to McKinley Village via Alhambra could help mitigate the C Street impacts.

We are unable to attend your upcoming public meeting but look forward to your response. Please protect our neighborhood by ensuring that the McKinley Village project is amended to address these traffic issues. Thank you.

Sincerely,



Donna Pozzi & Henrik Jul Hansen

Terry Reed, 2810 I Street

Marshall School/New Era Park Neighborhood

Comments regarding Draft Environmental Impact Report for McKinley Village

- As currently proposed, there will be only two access points to the development. It has been determined that approximately 1800 cars will exit the project at A Street and use Sutter's Landing Park. This will increase noise, pollution, usage, and other impacts to the Park and the wild life, in addition to affecting the livability for people living on 28th street and in the surrounding areas of midtown.
- A half-street closure at B Street, diverting traffic to B Street and down 29th Street will help relieve some of the traffic for 28th Street and C Street.
- There are no sidewalks and a steep grade into and leaving the park. This will cause safety issues for park users (pedestrians, bicyclists & skateboarders). Also, the park is not ADA compliant. Stanford Park is not ADA compliant either.
- There is no study of westbound traffic using F Street and G Street. With over 150,000 jobs downtown, some of the McKinley Village residents will likely work downtown and will use our neighborhood to get downtown. F and G Streets provide the westbound access to the Central City. No traffic studies were performed so there is no real understanding of the impacts.
- There is no transit access to McKinley Village.
- There is no commercial development within McKinley Village.
- Traffic impacts to C Street have not been thoroughly studied.

Dana Allen

From: BarbaraThalacker <bthalacker@comcast.net>
Sent: Wednesday, January 08, 2014 10:09 AM
To: Dana Allen
Subject: RE: Response to Draft EIR McKinley Village

Oh sorry Dana

Barbara Thalacker
2810 I Street
Sacramento, CA 95815
(916)813-0142

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: Dana Allen
Date: 01/08/2014 8:46 AM (GMT-08:00)
To: bthalacker@comcast.net
Subject: RE: Response to Draft EIR McKinley Village

Thank you. What is your name please?

Dana

From: bthalacker@comcast.net [<mailto:bthalacker@comcast.net>]
Sent: Tuesday, January 07, 2014 11:31 PM
To: Dana Allen
Cc: Marshall New Era; bthalacker7@gmail.com
Subject: Response to Draft EIR McKinley Village

Remarks in response to Draft EIR McKinley Village

1800 cars will exit the project at A Street and use Sutter's Landing Park.

There are no sidewalks and a steep grade into and leaving the park. This will cause safety issues for park users (pedestrians, bicyclists & skateboarders). Also, the park is not ADA compliant. Stanford Park is not ADA compliant either.

There is no study of westbound traffic using F Street and G Street.

Many of the McKinley Village residents will likely work downtown and will use Midtown Streets for movement in and out of the Village. F and G Streets provide the westbound access to the Central City. No traffic studies were performed so there is no real understanding of the impacts.

There is no public transportation immediately accessible to McKinley Village.

McKinley Village does not include any commerce, not even a coffee shop or grocery store. Thus for every daily need for food, entertainment, health, etc., residents will have to leave their neighborhood via streets of Midtown or East Sacramento.

We are also concerned about the impacts to Sutter's Landing Park. The additional car trips will impact easy access to the park, There will be an increase of noise, pollution and impact on the Swainson's Hawks and other raptors, and a heavier use of the beach areas of the American River. While there is some planned mitigation, it needs to be immediately adjacent to the park to restore the natural value of the current land.

One of the changes that could be made which would lessen the impact of some of the car trips thru Midtown and direct access to coffee shops, a grocery store and the 80 Freeway would be a partial closure of 28th Street at B Street and diversion to 29th Street.

While this property on the face of it is not a desirable place to build homes, there could be some changes which would lessen the impacts and increase the quality of life for current Midtown and East Sacramento residents.

Dana Allen

From: Susan French <sufrench11@gmail.com>
Sent: Wednesday, January 08, 2014 8:15 AM
To: Dana Allen
Cc: Ellen Cochrane
Subject: McKinley Village

Citizens who reside near Elvas Ave. oppose the proposed Village because of the traffic and pollution that would result from a new development. Theodore Judah elementary school is already full and children would have to cross Elvas to attend, along with people traveling to shop or work. Elderly residents, children, cyclists, and pedestrians will not be safe, not to mention motorists along Elvas. Toxic elements already dangerous from increased train schedules and freeway congestion will elevate, causing a shameful legacy to the city planners if they allow McKinley Village to be built. The levees will weaken and compromise flood protection for which our taxes were recently increased. Residents are angry and fearful, but even long after we are gone this project will have scarred the Sacramento community.

Susan and Richard French
65 Primrose Way

→

Dana Allen

From: rm yoshihara <rmyosx@sbcglobal.net>
Sent: Wednesday, January 08, 2014 3:06 PM
To: Dana Allen
Subject: McKinley Village EIR

Various neighborhood organizations have already expressed concerns I share with this project and I will try not to repeat what's already on the record. I am a resident in the McKinley Park neighborhood and have been so since the 1980s. In looking over the environmental documents I have two areas of concern 4.1 Air Quality and Climate Change and 4.8 Public Utilities.

4.1 Air Quality and Climate Change and Appendix C – Health Risk Assessment

The health risk analysis of project proximity to the SPRR tracks is not rigorous. It ignores the nearby rail line junction and the common occurrence of parked trains idling near the project site. It correlates DPM emissions with train speed assuming the diesel engines drive the wheels directly versus generating electricity for electric drive motors. Trains slow down and accelerate routinely through the adjacent curves and switches which is less efficient than the constant speed assumed. The HRA ignores the potential for particulate matter accumulating near the rail lines and being re-introduced into the air.

I can't imagine what overriding local concerns exist to ignore CARB guidelines for freeway setbacks. Air quality should be monitored at the project boundaries before the site is allowed to be developed for residential uses

4.8 Public Utilities

When the neighborhoods near McKinley Park have sewer issues (City Utility trucks are a common sight working at manholes), additional CSS inflow should not be allowed until infrastructural improvements are made. On-site detention capacities should be increased significantly above current requirements for any near term new development as a mitigation for the existing CSS being at or near capacity. The storm detention basin and sanitary storage tank locations should be shown on the project plans so there is no confusion that they are required as part of the project approval and that land has been set aside for them

Attaching a photograph taken in November 2008 illustrating the project location's potential for ponding with such a high water table. Could be mistaken for a wetland

Thank you,
Mike Yoshihara 417 33rd Street



Dana Allen

From: Davy Baumgartner <guycomet@gmail.com>
Sent: Wednesday, January 08, 2014 2:43 PM
To: Dana Allen
Subject: Re: Sorry I could not bring the land survey info on McKinley Village Project.. 1 idea for you..

Hi there Allen:

Just a suggestion for anyone you know who might like the info. I used to work in some of the top 100 nurseries in the USA and worked with home and land developers to maximize the value of the lot as far as future resale goes.

Example . A Home Depot Ficus Nitida on a Hollywood lot or new construction is not worth much 10 years later when the home is resold. A better choice might be a Lebanese cedar (Cedrus Libanum) or heat tolerant Apple such as ein Shemer or an Anna's, or a rare Plumeria variety. better increase in property resale worth.

cheers, David Baumgartner.

On Wed, Jan 8, 2014 at 1:11 PM, Dana Allen <DAllen@cityofsacramento.org> wrote:

Hi David

Was this meant as a comment on the DEIR? I am just confirming, or was this for the development team?

Thanks

Dana

From: Davy Baumgartner [mailto:guycomet@gmail.com]
Sent: Wednesday, January 08, 2014 1:09 PM
To: Dana Allen
Subject: Sorry I could not bring the land survey info on McKinley Village Project.. 1 idea for you..

Hi There!

Just to let you know that you might wish to call the California Native Plant society re the development project. They may be able to rescue usable plants for use in displays or relocate some.

Sorry I could not get to the Council meeting with my findings. I had an untoward attack one evening not too far from there. Fine now though.

Developers should choose new trees, plantings that dramatically increase the parcel values. the usual "top 100" plantings frequently are not worth as much 10. 20 years later when lot is resold.

David Baumgartner, wishing you a good January and Super Bowl weekend.

Dana Allen

From: Coral Henning <coralhenning@gmail.com>
Sent: Wednesday, January 08, 2014 3:07 PM
To: Dana Allen
Subject: McKinley Village EIR comments

I live at 20th and C Streets and am concerned about increased traffic from this project into our neighborhood without any mitigation. Perhaps a half street closure at 28th would help direct traffic over to 29th.

Sutter Landing Park is an up and coming jewel in the City. I use that park numerous times a week to walk my dog, visit the parkway and play bocce. I have safety concerns for pedestrians using the park with the increase in automobile traffic. Currently there are no sidewalks and a steep hill which is not ADA compliant. I hope safety will be a priority with the City.

Thank you.

Coral Henning
221 20th St. Suite A

January 8, 2013

Dana Allen, Associate Planner, City of Sacramento Community Development
300 Richards Blvd, 3rd Floor
Sacramento, California 95811

Michael Saeltzer
524 San Antonio Way
Sacramento, CA 95819

By e-mail: dallen@cityofsacramento.org

Re: Draft Environmental Impact Report (DEIR) for the McKinley Village project

Dear Ms. Allen,

The City has provided an opportunity for public input regarding the scope of the analysis of the Draft Environmental Impact Report (DEIR) for the McKinley Village project. This letter constitutes my formal input.

In my and others opinion we definitely need to include how the toxins (not just diesel) from I-80 will impact the proposed residents' of McKinley Village health outcomes.

I believe significant public opinion is indicating that there should be a more inclusive and accurate mechanism for analyzing how those who would be living in a proposed development would be affected by the environment in which they would be living.

To me it is simply common sense that we, as well as the City's leadership, would want to include a more thorough analysis of health in this as well as any other analysis of a proposed development.

I, and others (as evidenced by their letters), say this in full awareness that the DEIR makes it a point to explain that the law is set up in favor of the City not needing to do what many in the public are asking our City leadership to do. Yet, we continue to provide formal input regarding this issue of scope because we have faith that our City leaders, and this review process, are not there to simply check to ensure legal and bureaucratic "i's are dotted and t's are crossed" – though we recognize this must be also be done.

We have faith that our leadership will also question and change themselves, and their processes, when they are held up against public opinion and research such as that being generated and presented in this "forum". After all, as I understand it, this is one of the most important reasons that the DEIR is submitted to the public for comment.

Put in a slightly different way, based on many of our letters, the public wants the DEIR to do what the law states the City does not legally have to do. This I admit is a predicament of sorts.

Why does this predicament exist? What is driving it? Is it valid? If so, how much merit should it be given? These questions deserve good answers.

Many in the public think that regardless of a legal finding that states a DEIR need not consider the health of the people who will live in the houses of a proposed development, it is still the right thing to do.

Why?

Because of the quality, and the weight of the substance, of the evidence presented to us by our communities' best scientists, researchers, experts and doctors - particularly in matters regarding the health and safety of our citizens as it relates to one's living proximity to busy interstates such as I-80.

Also important to recognize is that one of our City's leadership's most fundamental responsibilities is to preserve the health and safety of our communities.

Our legal system is also set up very much in a way that continues to incorporate health research into its structure so that the health of our people is protected from things such as profit motive, or greed, or negligence that could distort our ability to act responsibly.

Perhaps this is why so many of us were disappointed when the DEIR went to such lengths to say that it does not need to consider this critical health issue based on a prior court ruling. The issue being an analysis which is broad enough in scope to consider worthy research regarding how the toxins in the environment in which the development is being proposed to be built will affect the health outcomes of the resident who would be living there.

The DEIR goes on to explain that it would respond to our concerns regarding this, but then unfortunately completely misses the mark. It did not at all adequately address our concerns in this matter. Essentially it didn't include anything except to provide research regarding cancer and diesel. Research tells us that cancer is not the central issue we face when dealing with freeway toxins. This presents significant flaws and omissions, particularly when held up against our society's current research and what we are saying to you collectively as the public.

I believe the flaws and omissions in the scope of the DEIR analysis were so serious and valid that many others in the public immediately picked up on them, and felt so strongly, that they are now signing petitions against this proposed development and writing DEIR responses such as this one.

For example, Dr. Harry Wang, the President of Physicians for Social Responsibility, a group which includes over 700 local doctors, also wrote to you and emphasizes these same flaws and omissions to which I am referring.

I, and many others in the public I am sure, will redirect you to his perspective and the research he and the other 700 local doctors bring to your attention. Please see their letter dated December 19th, 2013 and delivered via e-mail to you.

This most respected research continues to indicate the health outcomes of the fetuses, infants, children, adults, and elderly will be so poor that developments such as McKinley Village have gained the spotlight in science because they are particularly toxic and unhealthy to live in. They are also being written about in many established media reports that you may find by simply "Googling" "health issues proximity to freeways".

It is worth noting that as our research continues to reveal more things about these toxic developments, the law is becoming even stricter in regards to what can be safely built and where. The research cited by Dr. Wang and his associates, as well as other research, indicates trees and filtering systems do not provide adequate protection from these ultrafine toxic particles. Also, the research regarding safe distance from freeways continues to indicate more distance is needed than we have thought before.

This research confines safe development to areas that will be far more distant from I-80 than the proposed McKinley Village development. We need to include such research, especially the most recent findings out of Tufts School of Medicine in

our examination and base our decisions about “McKinley Village” with this research very much in mind, and very much as a top priority to consider. See for example the information in the following Tufts article found here:
<http://now.tufts.edu/articles/big-road-blues-pollution-highways>

This letter along with the research cited here and by Dr. Wang and the other 700 local doctors I hope makes for compelling evidence that the DIER contains critical flaws and omissions.

If this particular environment, unique to McKinley Village, is one such that our most qualified scientists, researchers and doctors have determined is particularly dangerous to human health and human development across the entire life span, and is of the type that laws are becoming more stringent against, of course we should not be building houses there.

What is unfortunate is that the developer will not make any money at all. And, this of course implies many political issues, ones that unfortunately some in our community have considered insurmountable. To this, I say rubbish. We are here to do the right thing, not the thing that fits in best with a political or short term profit based agenda. In addition, not building the development is not an economic opportunity lost. It is quite the opposite. I say this because the value of scratching the development brings to the City comes in the form of long term health as well as everything that a community may offer when its health is protected.

A community with poorer health outcomes is proven to present a critical long-term drag on our economy and overall social well-being.

Indeed then it seems quite evident that sometimes land left “undeveloped” within our City is a good idea because the environment you would be placing the residents in is known to be particularly harmful to their health.

This leads us to the Master EIR (MEIR) prepared for the 2030 General Plan which states “As an urban jurisdiction, the City of Sacramento intends to develop all land within its boundaries.” I, and others as evidenced by their research and their letters to you, hope that this does not mean the City intends to place houses on all land inside the City boundaries regardless of the health of the inhabitants because “we have to put them somewhere”. I agree we do have to put them somewhere, just NOT there.

If the MEIR does in essence mean we are going to be developing houses on all open land, then I would also formally request that the MEIR also similarly be adjusted in scope to include the omissions outlined in this letter.

We need to immediately remedy these critical flaws by expanding the scope of the analysis as outlined in our letters.

In matters of health and wellness, it is our duty to do so.

Sincerely,
Michael Saeltzer

Dana Allen

City of Sacramento, Community Development Department

300 Richards Blvd, 3rd Floor

Sacramento, California 95811

dallen@cityofsacramento.org

Dr. Mr. Allen:

My name is Kristin Thompson-Higgins, and I have been a lifelong resident of East Sacramento.

I have a number of concerns that need to be addressed before the McKinley Village Project is to be taken under serious consideration.

First, this development does not have a transportation plan and there is no access to light rail, bus or any other form of mass transportation. The developer plans on building 2 car garages yet does not plan to build the pedestrian/bicycle tunnel at Alhambra Blvd. until his final phase of development. This is too little too late, as residents of this proposed project's driving habits are already established.

This lack of mass transportation planning will force thousands of daily trips from this proposed area onto small residential streets that were simply not built to accommodate many hundreds of cars. These are the streets that our children have used for decades to go to school, to play in and walk and/or bike to recreation clubs, pools, and Sutter Lawn Tennis Club, where my family had a membership for over 30 years.

According to the developer, houses in McKinley Village will cost \$70 per square foot to build, far below the California average of \$125 per square foot and scores below the cost to replicate even the most basic of homes in the McKinley Park, let alone in the surrounding East Sacramento neighborhoods. We don't need low income housing in this congested neck of the woods. There are already severely overcrowded neighborhood schools. What would happen in this proposed McKinley Village Project if there would be a catastrophe? How would the residents escape a train derailment, a flood or a fire? There would be mayhem, but the result would be a total disaster.

Another thing to consider is the lousy air quality of the small tightly depressed bowl of air in that region. Many studies have been done showing the multitude of health problems related to living too close to a railway or a freeway. This inappropriate site is close to both! Also, there is methane gas wafting over this area from the closed landfill across the freeway. Yum, I would love to smell that first thing in the

morning when I throw my windows open!

I have been told that CalTrans is requiring a portion of the site that McKinley Village wants to occupy, for a very necessary widening of the CapCity Freeway, between E Street and Exposition Blvd. This area is seriously congested, adding 20+ minutes to anyones commute, easily. California Department of Transportation will also require some of this property to accomodate commuter trains, high speed rail and increased passenger and freight traffic. How will these mandatory, necessary widenings occur if there is McKinley Village in this cramped space? We cannot afford to let these sorely needed regional transportation projects delayed or postponed, for crying out loud.

This McKinley project is a no-go from the start. The proposed number of houses per acre far exceeds that of McKinley Park and our surrounding East Sac neighborhoods. The devolpers need to find an appropriate parcel of land where this "Village" would be properly thought-out and planned, not a wily-nily "oh, let's fit this in here" mentality. Get a grip. East Sacramento and particularly that parcel is not for sale to the highest bidder when it doesn't make economical sense, and the residdents DON'T want it!

s/Kristin Thompson-Higgins

irishfreckles11@gmail.com

phone number as requested

Heather Phillips
3241 C St
Sacramento, CA 95816

January 9, 2014

Dana Allen
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Blvd., Third Floor
Sacramento, California 95811

Subject: Comments on McKinley Village Draft EIR

Dear Ms. Allen:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed McKinley Village Project. I am a resident of the McKinley Park neighborhood in East Sacramento, and my property is located to the south of the proposed project site.

I support the City's efforts to pursue infill development on underutilized properties near downtown. However, I have concerns that the proposed residential project is incompatible with the proposed site that is currently designated as heavy-industrial land use under current zoning. The City should take a hard look at whether predominantly-residential land use is the best use for the site. Specifically, the City should carefully consider whether feasible alternatives exist that allow for some level of development on the proposed site without creating land use incompatibilities that may harm the public health and welfare.

I recognize that the current zoning of the site is heavy-industrial, and could currently be developed for industrial purposes if not re-zoned to residential under the proposed project. However, I do not believe this site is appropriate for or compatible with residential land uses. It is a noxious site, and, for this reason, I believe is appropriately zoned under current zoning. Knowingly placing residents (many of which may be first-time-homebuyers that include families with young children) next to a freeway that is a source of pollution known to result in cancer, asthma, and other developmental problems is irresponsible land use planning.

I urge the City to reconsider the impact conclusion under Air Quality Impact 4.1-6 of the DEIR. The Health Risk Assessment (HRA) prepared to support the analysis estimates that the first tier of homes constructed nearest Capitol City Freeway would be exposed to excess cancer risk of 80-120 cases in one million associated with diesel particulate matter (DPM) alone (pg 4.1-49). The results of the HRA do not include the contribution(s) from other California Air Resources Board (ARB)-identified toxic air contaminant (TAC) chemical constituents of diesel exhaust (e.g., acetaldehyde, formaldehyde, toluene, benzene). The proposed receptors would also be exposed to these TACs associated with mobile sources from the freeway. The HRA evaluates the cancer-related health risks to proposed sensitive receptors, but does not attempt to quantitatively or qualitatively characterize other types of health risk (e.g., chronic non-cancer, or acute health effects). Importantly, the City has not presented substantial evidence that proposed sensitive receptors nearest the freeway would not be exposed to substantial pollutant concentrations that may result in chronic or acute health impacts. Nor has

the City evaluated the expected cumulative health risks of all the known TACs present in diesel exhaust. If no methodology is available to evaluate the combined health effects of all pollutants present, this does not relieve the City of the duty to complete this analysis or reach a conservative conclusion in the absence of data.

The methodology employed on page 4.1-48 to characterize risk to proposed residents averages the DPM cancer risk over the entire project site. This “cancer burden” methodology dilutes the exposure of the receptors sited along the perimeter of the project site with the exposure of the receptors in the interior of the project site. This is an unconventional methodology that has not been employed by the City or recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD) in prior environmental analyses. I urge the City to reconsider the impact conclusion of “less than significant” for the proposed residents along the northern portion of the project site. The probability of cancer risk to receptors of 80-120 excess cases in one million from DPM would not be influenced by receptors elsewhere on the project site. The exposure of the receptors on the northern-project-boundary should be characterized independently of the exposure of the proposed residents within the interior portion of the project site. This will provide better information and disclosure about the expected cancer risk of the families that would occupy the freeway-adjacent homes. The City should substantiate with evidence that cancer risk would be “less than significant” for all receptors in a manner that is specific to their location on the project site, or characterize Impact 4.1-6 as “significant”.

A minimum 300-foot setback of residential land uses from Capital City Freeway would be consistent with the distance-related findings of ARB¹, rather than the current 30-foot proposed setback. This would protect the public from known health risks, as particle concentration is substantially reduced after 300 feet from a freeway¹. If the City will not require a setback greater than 30 feet, the City should provide an analysis of why it deems this widely-recognized setback distance infeasible. If the City will not require a 300-foot setback, the City should analyze the setback distance (greater than 30 feet) that would be economically feasible and also avoid significant TAC exposure. For example, the project could feasibly accommodate a non-sensitive land use type (e.g., commercial, light industrial, public, quasi-public, or open space) within the 300-foot setback from the freeway. This suggested alternative should be evaluated for achievement of project objectives. The City should exercise the greatest level of care to avoid knowingly-placing residents in an area of either unknown health risks or unacceptable cancer risk.

Finally, the City should require construction of the Alhambra Blvd bike-pedestrian undercrossing during the first phase of project construction as a condition of approval. As written, DEIR leaves the undercrossing subject to Union Pacific Rail Road (UPRR) approval, and does not specify subsequent action should UPRR deny the undercrossing. The City should require the approval of the undercrossing by UPRR prior to issuing any grading or building permits for the project site. The undercrossing is necessary to validate the assumptions in the DEIR regarding non-vehicle trip mode (e.g., non-motorized shopping trips), and Climate Action Plan consistency (e.g., connection to public transportation bus route 34). If the undercrossing is delayed, future residents of the proposed project would use the existing informal, unguarded path over the UPRR tracks (see Exhibit 1 below) at the terminus of Alhambra Blvd, which would create a public safety hazard not addressed in the DEIR.

¹ Zhu, Y et al. *Study of Ultra-Fine Particles Near A Major Highway With Heavy-Duty Diesel Traffic*. Atmospheric Environment. 2002; 36:4323-4335 as cited in California Air Resources Board. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*.

January 9, 2014

Page 3



Exhibit 1: Un-guarded Railway Crossing at Alhambra Blvd and B Street

Thank you for your consideration of my comments during preparation of the Final EIR for the proposed McKinley Village project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heather Phillips".

Heather Phillips

Dana Allen

From: Vickie Valine <vhvaline@cwo.com>
Sent: Thursday, January 09, 2014 10:24 AM
To: Dana Allen
Cc: Terry Reed; Suzie Johnston; Julie Murphy; Margaret Buss; George Raya; Bill Burg; Steve Cohn; Consuelo Hernandez; Jameson Parker; Scott Maldonado; Steve Hansen
Subject: Comments on DEIR for McKinley Village Development
Importance: High

From: Vickie Valine
2801 G Street
Sacramento, CA 95816

January 9, 2014

To: Dana Allen, Associate Planner
City of Sacramento, Community Development Dept.
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

RE: Comments on DEIR for McKinley Village Development

Dear Ms. Allen:

I have been a Midtown Sacramento resident for over 30 years, and have resided with my husband Matt on 28th Street in midtown for the past 14 years. For 12 years before that (1988-2000) we resided on 27th Street between G and H Streets .

For the first few years when we lived on 27th Street, G Street was a three-lane, one-way street that, for all intents and purposes, was a freeway by the way automobile drivers would drive at high speeds with no consideration for pedestrians or bicyclists.

Around 1998, after 21 years of NPTP (Neighborhood Preservation Transportation Plan)'s hard work, G Street was converted to a two-way street, a pedestrian island was added as a "rest stop" (and planter) for people crossing the street, and a half-street closure was added to G and 29th Streets. The load of car traffic on G Street was decreased ten-fold, and our streets became more livable and safe.

A higher volume of cars impacts emergency response time and increases the likelihood of accidents. The NPTP follow-up studies showed that the accident rate dropped on streets dramatically (about 60%) where the volume and speed were reduced.

Because of the decrease in traffic on G Street, my husband and I then felt comfortable enough in 2000 to buy our current house on G and 28th Streets. Over the years we have seen an increase in development downtown, and there has been an increase, in the last 14 years, of traffic on 28th Street. I now have trouble pulling out of my driveway, the few times I drive my car now, because of the increase in traffic on 28th Street.

The City of Sacramento must address the impacts to neighbors on the increased traffic flow that McKinley Village will bring to the surrounding neighborhoods. Studies have shown that increased traffic is a detriment to neighborhoods, and people then move away. The City will then lose the mix of household income and the diversity of the neighborhoods. The City needs to preserve and restore the residential nature of the City streets.

To bring the point home, we are now considering whether we want to live on a street that may soon have (conservatively) an ADDITIONAL 1,800 + car trips a day traveling by our house.

If the McKinley Village development goes through, the City must implement mitigation measures to prevent traffic impacts on the livability of our City streets and preserve the residential nature of our streets. Older residential neighborhoods should not be sacrificed for a potential new neighborhood that is poorly designed.

Sincerely,

Vickie Valine
2801 G Street
Sacramento, CA 95816

cc: City Councilmember Steve Hansen
City Councilmember Steve Cohn

Pamela Milchrist

680 40th Street

Sacramento, Ca.

95819

916-731-5199

milchrist@surewest.net

To: Dana Allen

From: Pamela Milchrist (Resident East Sacramento)



Subject: Written Comments Regarding the Draft EIR for McKinley Village

I have one question and a comment in regard to the EIR report finding that there will be no significant impact on traffic in East Sacramento resulting from the proposed McKinley village project.

Question:

Was there consideration given to future projections for train traffic on the Union Pacific rail line in determining the traffic impact the proposed McKinley Village site would have on East Sacramento neighborhoods? Specifically, was there any research done on the projected increase of imported goods from the Pacific Rim countries and the use of rail traffic through Sacramento corridor for delivery of imported goods to the rest of the country?

Concern:

With one of the two of the proposed exits of the project going over the Union Pacific rail lines (UPRR), it is highly likely (because of increased train traffic and perhaps longer freight trains) that individuals will find it easier to use cross streets within the East Sacramento community rather than wait for trains. If there is less automobile traffic at the proposed exit at A and 28th than projected by the EIR, will that significantly impact the flow of traffic into East Sacramento from the 40th Street exit site?

I would suggest that the EIR re-examine its baseline for impact analysis of traffic patterns to include future projections for train traffic in the proposed area of development.

Dana Allen

From: J Yoshihara <jkyosh@sbcglobal.net>
Sent: Thursday, January 09, 2014 2:52 PM
To: Dana Allen
Subject: McKinley Village

I am responding to the environmental impact report, November 2013.

The applicant is requesting a zoning change from heavy industrial to residential. The site is surrounded on one side by a heavily trafficked freeway and the other three sides by equally well used freight line. Even though it is referred to as an infill project, there are no utilities, public transit or adequate vehicular access currently serving this site. In addition, it is a landlocked site surrounded by polluting elements with no existing amenities natural or built.

The current designation as heavy industrial is appropriate given major toxic polluting sources adjacent to the property. The study addressed particles less than 2.5 microns (PM2.5) from motor vehicles, but failed to adequately address the other source from freight trains. According to dot.gov publication, 21% of PM2.5 is from motor vehicles and 10% from freight trains. The future residents would be exposed to 31% of PM2.5 just by living in McKinley Village on a daily cumulative basis. Also the report did not mention the site is down wind from the sources that exacerbates the exposure to PM2.5. The report addressed cancer development rates in a population, but neglected to mention asthma and cardiovascular disease development rates as a result of exposure to PM2.5. There are many studies correlating diesel dust to asthma and cardiovascular disease. These are particles that lodge deep into the lungs. The proposed 100ft. buffer between the freeway and freight line is not sufficient to filter the particles. It would take many years for the trees to have adequate canopy to filter some of the pollutants. Does the 100ft buffer meet the state of California guidelines for housing next to a freeway and to a freight line? Is it appropriate environment for growing children? As a society, we all bear the cost of poor health.

Additionally, the freight line curves at the site. Derailment occurs where lines curve. The study made no mention of the line curving. Housing adjacent to potentially increased derailment portion of a freight line does not seem to be appropriate.

Also, the day the traffic counter was on 33rd Street between McKinley and C street a city utility truck blocked the street. This probably skewed the number and the speed of the traffic on the street. Additionally, the Great Recession has reduced the traffic as a result of less workers at the Cannery business park. The traffic study needs to incorporate the worst case scenario when the Cannery is at full capacity since it utilizes the same existing streets to exit the neighborhood.

I hope the city will consider the health, safety and well being of the residents prior to make the zoning change and prevent a failed development as a result of poor market and site analysis.

Thank you your attention.

Sincerely,

Julie Yoshihara
Resident of 33rd Street

Dana Allen, Associate Planner
City of Sacramento, Community Development Department,
300 Richards Blvd., 3rd Floor, Sacramento, California 95811
dallen@cityofsacramento.org

January 9, 2013

Re: McKinley Park Village - Comments on Draft Environmental Impact Report (EIR)

Dear Dana Allan:

I would like to provide the following comments on the accuracy and completeness of the proposed McKinley Park Village Draft EIR.

My comments are limited to the proposed second vehicle access to be located as an extension of 40th Street through the Cannery Business Park site connecting to C Street between 40th Street and Tivoli Way.

Comments:

1. The Draft EIR and included project traffic analysis fails to recognize the **livability impact** of the project on the existing residences (Section 4.9). It's understood that traffic Level of Service (LOS) A will be maintained for adjoining streets. However, this observation does not take into account the negative impact of increased traffic on current quiet residential streets (indirect physical environmental effect). The livability of those residential streets would be impacted by an increase in traffic volumes and subsequent higher speeds. This negatively impacts walking, bicycling, playing children, and sound levels. Current East Sac residents have chosen to live in the current street grid because of low traffic volumes and high degree of livability.
2. The project fails to take measures to direct future traffic away from low-volume streets like 40th Street and Tivoli Way. **A mitigation for this impact would to connect the eastern site access at Lanatt Street.** This action would direct traffic through a current light industrial/commercial/business area, and better direct traffic patterns away from residences and onto the existing Elvas Avenue major collector roadway.
3. The Draft EIR fails to recognize the negative impact of the new 40th Street extension as **un-necessary impervious paved area** and its increased costs for future city street maintenance, impact as increased storm water runoff and water quality, and resulting urban 'heat-island' effect. The proposed project constructs a new street in place of using the existing Lanatt Street facility. This is an unnecessary addition of paved area where there is viable use of existing Lanatt Street. Building additional street results in increased City street maintenance costs, and increased urban area temperatures as an added heat-sink for heat energy. Furthermore, this plan fails to fully implement runoff reduction goals as stated on Page 2-55 and discussed in Section 4.5.3.
4. The project proposes to add stop control at the new 40th Street intersection with C Street. However, **the project introduces a complicated intersection** were the 40th Street Extension will be offset from the existing 40th Street, Tivoli Way, and the Cannery site driveway. This configuration introduces traffic conflict points that can result in future collisions and reduced safety. These conflict points would be eliminated with use of existing Lanatt Street and the benefit of traffic control at that intersection instead (suggest a roundabout at Lanatt Street to slow traffic and eliminate the need for stop control).

5. **The Draft EIR is incomplete as it fails to study Lanatt Street as a viable project access alternative.** Page 2-49 discusses “a new bridge structure/roadway underpass at Lanatt Street...as infeasible....” Reasons in dispute include:

- a) First, the Draft EIR states use of Lanatt Street is infeasible and not preferred because it is an industrial area of large trucks backing into driveways on the street and blocking street emergency movements. – This point is invalid in that there is currently only one business that has potential for truck staging (American Linen Supply Company/ALSCO). Truck staging in the street is observed to be limited and only occurs because Lanatt Street currently has no through traffic. With the current space available to this business, a change in their operations would eliminate the need for street staging. Other businesses include dance/art studios with no need for large truck access. Also, a seldom accessed Caltrans warehouse and empty yard is set far back from the street with no need for street staging due to the large size of the existing property.
- b) Second, the Draft EIR states use of Lanatt Street is infeasible and not preferred because construction of the underpass would pose significant business disruptions – This point is invalid because the underpass itself would most likely remain in the same rough location as currently planned. Adequate construction and staging areas exist as to not impact existing businesses. Temporary access through the Cannery during construction would eliminate use of Lanatt Street during construction except for a low-impact final stage to connect the new street with the existing Lanatt Street alignment.
- c) Third, the Draft EIR states use of Lanatt Street is infeasible and not preferred because “sight lines for vehicles exiting the project via the underpass would be inadequate...with respect to the driveway access for an existing industrial operation.... Elimination of this industrial driveway would cause significant impairment to the existing industrial use.” – This perceived impairment is not valid. The existing businesses have sufficient areas in which to operate. Good civil engineering design would eliminate sight distance inadequacies. Furthermore, the “industrial operation” is not (and should not) be taking place in the street, but within the adequate adjoining private parcels. Moreover, the dance studio and lightly used warehouse operations are NOT commercial in nature. Railroad access to railroad facilities could easily be accommodated with all railroad activities taking place away from Lanatt Street in both current and future cases.
- d) Finally, the Draft EIR states use of Lanatt Street is infeasible and not preferred because existing buildings and multiple property ownerships add to the logistical difficulty of constructing a bridge structure/roadway underpass at this location.” – This point is invalid. The “logistical difficulty” argument is avoidance of good design practice, avoidance of beneficial urban planning, and avoidance of appropriate right-of-way acquisition.

A Lanatt Street access better meets the project Objectives to "utilize sustainable design and low impact development concepts" and to "provide adequate access points for vehicular traffic". Moreover, use of existing streets is more in keeping with the concept of "infill development".

The above inadequacies to the Draft EIR should be rectified, eliminated, and/or mitigated.

The proposed 40th Street extension through the Cannery site is an impact to existing neighborhood home properties. Use of Lanatt Street as the eastern site access to the project is reasonably feasible and must be made part of the project in place of the 40th Street extension.

My current objection to the project would be eliminated if access is changed to use Lanatt Street as discussed above. Without this change, the City should not approve the project.

Lyle Stockton
280 Tivoli Way
Sacramento, CA 95819
916-453-0262

Dana Allen

From: Roberts, Valerie@CDFA <valerie.roberts@cdfa.ca.gov>
Sent: Thursday, January 09, 2014 3:07 PM
To: Dana Allen
Subject: RE: McKinley Village Draft EIR extension of comment period

Hi Dana,

My comment is as follows:

Most of my neighbors and I enjoy walking to the store, library, restaurants, etc. Unlike Natomas, we don't drive into our garages on Friday and aren't seen again until Monday morning. We know our neighbors, because we have porches and enjoy being out front. If we have a lot of cars going down the street that impact our lives. This report is just about traffic (levels of service), not livability of the residential streets that traffic effects.

City policy M 4.3.1., as stated in your EIR states, "to design streets and improve development applications to reduce high traffic flows within Residential neighborhoods." Well perhaps the new development will have this applied to it. I believe existing neighborhoods should be protected. A residential street should not have more than 100 cars on it in a day.

I object to the potential Village residents, that will be subject to the noise and pollution of the highway and the railroad. I really can't imagine the city allowing that to happen, although you did let people keep building in Natomas, when it was a flood zone.

My neighbors and I have a right to enjoy the community we bought into, figuratively and literally, we liked the fact it doesn't have a great deal of traffic, yet is close to downtown and activities.

Respectfully submitted,
Valerie Roberts
3148 D Street
Sacramento, CA 95816

From: Dana Allen [<mailto:DAllen@cityofsacramento.org>]
Sent: Monday, December 09, 2013 10:32 AM
To: Dana Allen
Cc: Tom Buford
Subject: McKinley Village Draft EIR extension of comment period

The City of Sacramento, Community Development Department has extended the comment period on the Draft EIR for the McKinley Village Project to January 10. Please see the attached revised Notice of Availability.

Thank you for your interest in this project.

Dana L. Allen, Associate Planner
Environmental Planning Services
Community Development Department
City of Sacramento

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR PROPOSED
MCKINLEY VILLAGE RESIDENTIAL DEVELOPMENT

January 8, 2013

Richard VanCuren, 3225 McKinley Blvd., Sacramento, CA 95816

tonyvancuren@yahoo.com.

The comments presented here focus on the inadequacy of the DEIR in regard to traffic and circulation issues. These inadequacies listed here, with fuller discussion in the following pages.

Needed revisions and expansion of the DEIR, at minimum:

1. Revision of the DEIR impact assessment for traffic and circulation to properly reflect the impacts of the proposed project on the surrounding neighborhood. The analysis should include assessment of the proportional increase of traffic on area streets, as was used by the city in designing and assessing the success of the Midtown Neighborhood Preservation Transportation Plan.
2. Expansion of discussion and analysis of project alternatives, including consideration of a project alternative that incorporates a modified circulation plan including vehicular access at the north end of Alhambra Blvd. The developers' objections to the cost of such a connection are not sufficient grounds to eliminate study of this alternative.
3. Recognition of the already marginal public transportation service in the area, including the recent discontinuation of transit (bus) connection to light rail (Transit Renewal 2012-2017) and the impracticality of providing transit access to the project itself.
4. Assessment of the negative impact of the project on regional circulation by the making the A St. bridge over Business-80 a major access route to the project site. This will create an added impediment to resolving the existing "bottleneck" congestion on Business-80 due to lane reduction north of the E St. onramp.
5. Correct misrepresentation of bicycle access via Alhambra Blvd. tunnel. The DEIR and the McKinley Village PUD guidelines both indicate a bicycle/pedestrian tunnel to be included in the project, but recent statements by the developer contradict this. The City should require the developer to clarify the status and intended timing of construction of this underpass, and correct all documents appropriately.

1. Revision of the impact assessment for traffic and circulation to properly reflect the impacts of the proposed project on the surrounding neighborhood.

The traffic assessment in the DEIR is focused on determining the impact of project-generated traffic on traffic flow alone, and does not address the impacts of traffic on the livability of the impacted neighborhoods.

As noted in the DEIR, traffic impacts along portions of C St. are already unacceptable for both traffic flow and for the livability of a residential neighborhood. As such, absent alternative circulation improvements (*e.g.* vehicle access from Alhambra Blvd.) or a reduction in the number of dwelling units in the project, this is an unmitigated impact.

Moreover, the impact of increased traffic on presently quiet residential streets is not limited to traffic delays, but includes noise and increased risk to pedestrians (particularly the elderly and children) from faster-moving through traffic. Consideration of such concerns were accepted as policy by the City in assessing traffic impacts and adopting traffic calming measures to protect the residential livability of Midtown (City of Sacramento, 1996; Brown and Fitzsimmons). Traffic calming measures to be installed within the project are included in the City's PUD guidelines for the project (City of Sacramento, 2013). Similar consideration should be given to existing residential areas impacted by this project.

The perception of traffic by residents is an important characteristic of a neighborhood. Absolute numbers of cars do not reflect the impact of modest increases in numbers when the baseline traffic is very sparse (see the example of D Street in the Midtown Plan). The analysis should include assessment of the proportional increase of traffic on area streets, as was used by the city in designing and assessing the success of the Midtown Neighborhood Preservation Transportation Plan.

2. Expansion of discussion and analysis of project alternatives. The significant traffic impact already felt around the Cannery Business Park will be markedly increased by the proposed project. Much of this impact could be mitigated by creating vehicular access from the project directly to the north end of Alhambra Blvd., with little impact on the current project design.

An honest and comprehensive discussion of alternatives must include consideration of a project alternative that incorporates vehicular access at the north end of Alhambra Blvd.

The developers' objections to the cost of such a connection are not sufficient grounds to eliminate study of this alternative. The identified traffic problems are inherent limitations of the site, and is incumbent on the City to include in the DEIR discussion of all technically feasible mitigations.

- 3. Recognition of the already marginal public transportation service in the area.** The DEIR discussion of transit access simply accepts the current inadequate access, and does not address how that does not fit with the City Plan guidelines or the intent of AB375.

The DEIR needs to acknowledge the recent discontinuation of transit (Rte. 34 bus) connection to light rail (Sac RT, 2012) and the impracticality of providing transit access to the project itself. Although geographically proximate to the central city, this particular project cannot meet the City and State planning goals of pedestrian access and reduced dependence on private vehicles.

- 4. Assessment of the negative impact of the project on regional circulation.** The current congestion on North-bound Business 80 is aggravated by two narrow bridges over the freeway, one for the UP railroad and the other for A Street. Caltrans has indicated that its long term plans for HOV lanes (Caltrans District 3, 2012) include adding an HOV lane between E Street and CalExpo.

By making the A St. bridge over Business-80 a major access route to the project site, the project will complicate efforts to correct this, both by making improvements to a bridge that is already facing removal or modification to resolve existing traffic, regionally significant congestion on Business-80, and by imposing logistical constraints on any future fixes in this area because closing A Street during extended freeway construction would put the McKinley Village area and its residents at risk due to having only one remaining access point. Thus, the proposed project will serve to perpetuate a regional traffic problem by compounding ageing infrastructure with poor land use planning.

In parallel with the comments at 2 (above), a reasonable mitigation to this impact is creation of vehicular access at Alhambra Blvd. This should be assessed in the DEIR.

- 5. Correct misrepresentation of bicycle access via Alhambra Blvd. tunnel.** The DEIR (p. 2-45) and the McKinley Village PUD guidelines (Fig 24, pp. 5-6, and 44-45) indicate a tunnel to be provided, but recent statements by the developer contradict this, suggesting that the tunnel would be built "at a later time." The City should require the developer to clarify the status and intended timing of construction of this underpass, and correct all documents appropriately.

If the recent statement is correct, that the underpass will be delayed, the City should reject any such plans.

RELEVANT DOCUMENTATION:

Brown, Steven, and S. Fitzsimmons (undated), CALMING THE COMMUNITY (Traffic Calming in Downtown Sacramento), Institute of Transportation Engineers, Washington, DC <http://www.ite.org/traffic/documents/AHA97G52.pdf>.

Caltrans District 3, Sacramento Region Bus/Carpool Lane Network Vision, http://www.dot.ca.gov/dist3/documents/D3HOV_Vision2011_Final.pdf.

Caltrans District 3 (2012), *State of the Corridor Report*, 2012 Report on the Interstate 80 and Capital City Freeway Corridor System Management Plan, http://www.dot.ca.gov/dist3/departments/planning/csmp/2012_SOTC_Reports/2012_Final_I-80_Cap_City_SOTC_11-29-12.pdf

CH2M Hill (1993), Evaluation of Midtown Neighborhood Preservation Transportation Plan: Final Report

City of Sacramento (October 2013), McKinley Village Planned Unit Development Guidelines, City of Sacramento, Planning Department, http://portal.cityofsacramento.org/~media/Files/CDD/Planning/ActiveProjects/McKINLEY_VILLAGE_PUD_GUIDELINES.ashx

City of Sacramento (May 1996), Midtown neighborhood preservation transportation plan (NPTP), City of Sacramento, Planning Department.
Sacramento Regional Transit District (2012), Transit Renewal 2012-2017, http://sacrttransitrenewal.tmdinc.net/pdf/1_TransitRenewal_y1.pdf

Dana Allen

From: Aja <ajacalifornia@gmail.com>
Sent: Thursday, January 09, 2014 3:37 PM
To: Dana Allen
Subject: McKinley Village project concerns

Hi Dana,

I have been following the McKinley Village project developments through my neighborhood group in Marshall School/New Era. I and my husband, Jason Poole, are residents at [REDACTED] **(please do not publish our physical address or email address in any public format. Thank you)**. We are very concerned about the traffic impacts of McKinley village, both on a noise and safety level. I would like to see a stop light put at 28th and G St to manage that level of traffic. There are accidents and near-accidents (screeching tires and shouting) at that intersection several times each week even without the additional 1800 cars.

I would also like signage and enforcement for speeding, loud music, and loitering if the traffic is increased. It is unclear to me how our parking will be impacted, but I think it goes without saying that there had better be plenty of parking built into McKinley Village, as it is already hard enough for my husband and our guests to find street parking after 7pm on weekdays.

I understand and value that I live in an urban environment. But I do not believe poor traffic management needs to be an automatic part of being urban.

Thank you for your attention to this matter.

~Aja

--

Aja Uranga-Foster
mob: +1 916 221 2429

Dana Allen

From: Emily Wright <emily.wright@sbcglobal.net>
Sent: Thursday, January 09, 2014 3:54 PM
To: Dana Allen
Subject: "McKinley Village" development traffic concerns

Dear Planners,

As a resident of I Street, I already suffer from the effects of incomplete study of traffic effects: the Midtown traffic calming of a decade or more ago failed to predict the number of cars that would use I Street. The number estimated was about 10 % of the actual number of cars that use my street. At many hours during the day, crossing the street, even in the crosswalk and waiting carefully for traffic to clear, is unsafe. There are just too many cars. When so many cars use a street as a way through a neighborhood, as in going through Midtown to get to Downtown or the I-5 freeway, the street is no longer residential, and the drivers no longer watch for pedestrians and bicyclists, to say nothing of small children or pets. Yet we are still residents, and have a right to a residential traffic speed and watchfulness.

I am particularly concerned that the traffic from the proposed new "McKinley Village" development has not been studied as to its effect upon Midtown traffic, only upon East Sacramento traffic. There is no way that thousands of cars coming down 28th street will not add the to already onerous burden we residents of I street endure.

I urge you to insist upon accurate estimates of traffic effects and full public disclosure of the estimates long before any plan comes to the Council for a vote.

Yours,
Emily Wright
2420 I Street
Sacramento, CA 95816

Emily Wright
emily.wright@sbcglobal.net

January 9, 2014

Dina Cataldo
224 San Miguel Way
Sacramento, CA 95819

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

Dear Ms. Allen:

The McKinley Village developers have presented this project as an extension of the McKinley Park neighborhoods, but it is not designed as such. The development as designed is dense, the streets do not blend into the existing community and developers are not taking the time or spending the money to create a third access point to integrate rather than overwhelm the small streets that will receive the traffic. The developers pay lip service to integrating and paying its "fair share" to pay for intersection timing and additional street improvements on bigger streets poorly designed to hold heavy traffic and yet ignore the small streets that will be most heavily impacted by the nature of this project. **I am not opposed to this project generally, but I am opposed to this project without a third access point and fewer homes to decrease the density.** I fear that this development will attract buyers who then rent their properties to those who do not care about their property or the quality of life in the surrounding neighborhoods. Renters do not take pride in ownership like a home owner does, and I learned this only recently when I purchased my house on San Miguel Way and C Street almost 2 years ago.

The list below outlines my most pressing concerns.

- I. **RE: 4.6-3 from Table ES-1 outlining the "Summary of Impacts and Mitigation Measures"**

Per the DEIR, the Environmental Impact (EI) of "the proposed project could permanently increase ambient exterior noise levels in the project vicinity (off site) that exceed city standards." However, despite the fact that the noise will exceed city standards, this was deemed in the DEIR as a less than significant change from the current level of noise, which

was also deemed "less than significant." No mitigation is planned because of this determination in the DEIR, and this does not make sense considering the noise level will exceed city standards. "No mitigation" is not an appropriate response to noise level that will exceed city standards. This determination is either a mistake or disingenuous.

In 1.5 "Scope of the Draft EIR", the writers state, "There are no impacts that remain as significant and unavoidable and which cannot be substantially lessened." However, as noted in this case, and some below, there are permanent violations of the City noise code that will occur, yet the DEIR analysts somehow deem these impacts as less than significant, so that they do not need to invent mitigation measures. This is sloppy, and it is misleading. Appropriate steps to mitigate this problem should be taken.

II. RE: 4.6-6 from Table ES-1 outlining the "Summary of Impacts and Mitigation measures"

In 4.6-6, the analysts looked at whether the EI of "the proposed project could expose on-site residential areas to vibration greater than 0.5 inch per second due to adjacent highway traffic and rail operations." The DEIR analysts also determined this EI would be less than significant both before and after mitigation. The disclosure portion is what bothers me. Although it says that disclosure statements shall be provided stating that "vibration may be periodically perceptible during train pass bys," the language should say that is "will be perceptible during train passbys. I live one block away from the trains, and I can feel the vibrations and hear the noise cause by trains. The train conductors also blow their whistles despite an ordinance that should prevent them from doing so except in emergencies. The trains will be a significant portion of a new resident's life, and they should be made aware that they "will" have their quality of life affected by these trains.

III. RE: 4.6-7 from Table ES-1 outlining the "Summary of Impacts and Mitigation Measures"

Again, the language in the EI 4.6-7 reads, "Increase in cumulative noise generated by future passenger and freight operations could expose project residents closest to the UPRR tracks to increased noise and exceed city standards." Yet the level this is considered less than significant, so no mitigation will be done. There should not only be a disclosure provided to

those who buy these properties, but mitigation measures must be taken to lessen the effect of train noise on residents inside the new development.

IV. **RE: 4.7-3 from Table ES-1 outlining the “Summary of Impacts and Mitigation Measures”**

In EI 4.7-3, the analysts found that “the proposed project could generate an increase in students that would exceed the design capacity of existing or planned schools that would serve the sight” as a less than significant impact. What was not considered was the very real and significant impact that an increase of traffic to these schools will bring to the surrounding neighborhoods. I live on San Miguel Way, which is a direct street to the back gate of Theodore Judah Elementary. As it is now, parents speed down my street to get their children to school on time. I cannot imagine how many more cars will speed down my street because parents are too careless to drive safely. Small children walk to school and ride their bikes to school, and these parents could care less about their safety either. Our neighborhood is not prepared to handle the kind of traffic that will spill into our small neighborhood.

V. **RE: 4.9-2 from Table ES-1 outlining the “Summary of Impacts and Mitigation Measures”**

An Alhambra car access point is essential to making this project work. Relating back to 4.7-3, this project will cause significant impact to local transit in our neighborhood. 4.9-2 reads, “Project buildout could cause potentially significant impacts to transit.” The determination was that this was “less than significant” and therefore did not require mitigation. I disagree. Mitigation should be required before permitting this project to go forward. This project will cause significant increases to traffic in its surrounding neighborhood streets. The traffic will spill down every street the forks off of Elvas and C Streets. One way to mitigate this problem will be to allow access to Alhambra Blvd. to lessen the huge impact this project will have on the neighborhood.

It should be noted that in 4.9 – Transportation and Circulation – the Traffic Counts section indicated:

Based upon a comparison of one day traffic counts, the evaluation found an approximately 21% increase in overall traffic during the AM peak hour at study intersections in the vicinity of Theodore Judah Elementary School when school is in session. This variation is outside the realm of typical day-to-day fluctuations in traffic volume, and indicates that AM peak hour travel patterns within the area are affected by the school.

VI. RE: 4.9-6 from Table ES-1 outlining the “Summary of Impacts and Mitigation Measures”

What is a “fair share” to monitor and retime H Street/Alhambra Blvd., H St./30th St. and H St/29th St. traffic signals as well as other improvements?

Additionally, the analysts deemed these streets to be a significant problem worthy of mitigation while the traffic spilling into neighboring streets was deemed by these same analysts as less than significant. This is simply incredulous. It does not make sense. If the developers’ analysts believe that there will be a significant impact REQUIRING mitigation for these major streets already built to carry heavy loads of traffic, why do they not see the significant impact it will have on the streets leading to and from these intersections? This is simply unbelievable and should be looked at closely because the analysts are either disingenuous or reckless in this determination. This is yet another reason an Alhambra entrance is required to make this project work.

VII. RE: Table 2-2 outlining the “Evaluation of Alternatives by Impact Area”

In 4.4-1, the “Impact” is that “the proposed project could expose people to existing contaminated soil during construction activities.” Why is it that the proposed project does not require mitigation because it is deemed a less than significant impact when any other project developed on that site would require some sort of mitigation to protect residents, construction workers, etc.?

VIII. RE: 4.1 “Air Quality and Climate Change”

In 4.1.2, fireplaces are addressed as contributors of particulate matter. Why are fireplaces being built into homes that are already in an area where pollutants are of such major

concern to the developers that filtration systems are being installed in homes? Based on some of the designs, it appears that there are fireplaces in some of the planned homes. Are these decorative or functional?

One way to reduce the impact of particulate matter is to eliminate this feature. The cumulative effect of these fireplaces and the nature of the area proposed for development make this design feature improper. This is especially true because we know that both CalTrans and UPRR expect to expand the freeway and the railroad in the near future due to continued growth in our region.

IX. RE: 4.5-9 "The proposed project, in addition to other projects in the watershed, could result in increased numbers of residents and structures exposed..."

My concern is with who is modifying Sump 99 with an electrical upgrade? The developers should handle that if the City is not. This must be settled before development begins.

X. RE: Home Owner Association

Will the HOA take care of yard work? If this is the case, this will assuage a lot of peoples' fears that this project will turn into a bad neighborhood.

XI. RE: 4.6.4 – Residences closest to the train tracks

Right now the language in the DEIR states, "it is recommended that disclosure statements should be provided to all prospective residents in this area, as well as recorded against the land, notifying all potential homebuyers of the presence of the UPRR tracks and the accompanying elevated noise environment associated with existing and projected increased future rail activity." Is this merely a recommendation? How do we make sure that the developers do this? This should be required.

XII. General Traffic issues

1. Be aware that the small streets cannot hold side by side two car traffic.

Throughout the DEIR, the analysts refer to the streets in the McKinley Park area [including C, 39th, 36th, Tivoli, 40th, 39th and San Miguel Way] as two car streets. [Table 4.9-4

“Roadway Capacity Utilization – Existing Conditions.] These streets are in no way designed to allow two cars to pass each other in the streets. If there is a single car parked on one side of the roadway, one car must stop and allow the other car to pass. Then factor in leaves on the sides of the streets, trash days, parking for events that occur at the local schools and you have a recipe for accidents. These streets are not designed to handle the kind of traffic this project anticipates.

2. An Alhambra Blvd. entrance ensures ease of access for law and fire departments.

In Table 2-2 “Evaluation of Alternative by Impact Area,” the DEIR analysts found a less than significant risk that the proposed project could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. However, an Alhambra entrance would ensure an entrance closer to residents on the west side of the property uninhibited by potential train passbys.

If the Alhambra entrance is TRULY unfeasible as discussed in 2-46, a 3rd access point must be found. A third access point on Lannatt can be obtained by applying for an exception to get an at grade crossing from UPRR. Has this been an option looked into? I understand the developer says that these access points are cost prohibitive, but if this development is created, it must integrate with the surrounding neighborhood not overwhelm it. **A third access point would go a long way to creating the integration that the developer says they want to create.**

3. A freeway entrance may be expensive, but it would assuage some of the problems we will have when the E Street entrance is closed.

Why is a freeway entrance inappropriate? Is it just to save the developers money? This option should be considered to mitigate the effect of traffic on the surrounding

Yes, traffic will increase, but a third entrance/exit will spread the burden and make the quality of life better for everyone should this project be approved.

XIII. RE: Construction Quality

It is my understanding that the houses in McKinley Village will cost \$70/square foot to build. This cost is far below the cost to replicate homes in the McKinley Park neighborhood. This and the increased volume of homes on the market will affect home prices. As a new homebuyer, I am concerned with my investment. I am not the only one. Most of my neighbors do not want to see this project developed. I believe that if it is developed that it should be done with the current neighbors in mind. So far, the developers have not done this.

XIV. RE: Density of the project

The number of houses per acre far exceeds that of McKinley Park and surrounding East Sacramento neighborhoods. I understand that this project will not be perfect, but again, the developer's insistence that this project is meant to be an extension of McKinley Park and East Sacramento neighborhoods is a fallacy if they cannot keep the project from burdening their neighbors rather than truly becoming a part of the neighborhood. Please hold the developers accountable and keep this area a town treasure.

Conclusion

I saw Phil Angelides presentation before the City's Planning Commission. He was charismatic and articulate. However, he is also a businessman selling a product. Please be mindful of that and call the developers on their inconsistencies and failure to create a project that will blend into the existing neighborhoods rather than overwhelm it. Thank you for your time.

Dana Allen

From: Deniz Tuncer <deniztuncer@sbcglobal.net>
Sent: Thursday, January 09, 2014 5:11 PM
To: Dana Allen
Subject: McKinley Village

Hello,
I wanted to write to share that I am very concerned about the traffic impacts to Midtown regarding the proposed McKinley Village project. As far as I have heard, there has not been an adequate traffic study. My understanding is that there could be an additional 1800 cars on our streets, and many would make their way through Midtown. These are quite, neighborhood streets, for the most part, and this level of added traffic could have a significant negative impact to our neighborhood.

Deniz Tuncer
2320 D Street
Sacramento, CA 95816

Dana Allen

From: tlsimpson7@aol.com
Sent: Thursday, January 09, 2014 5:19 PM
To: Dana Allen; Steve Cohn
Subject: MKinley Village, Sutter's Landing Park and the surrounding areas

Ms. Allen,

I am writing in regards to the McKinley Village development and the impact that it will have on the surround areas. I have lived in midtown for the past 15 years. I am raising two boys here and have a vested interest in seeing our city developed with care and planning.

I have been following this project for some time, attended meetings and done some research. I am not sure that all of the questions that were posed (traffic patterns, affects on wildlife in the Sutter's Landing area, impacts on pedestrian access to the river, etc.) have been answered fully. In fact, I feel that there are many unanswered questions and possible impacts that have yet to be addressed.

From all accounts, it does not seem feasible to have the density that is planned for that area result in well flowing traffic patterns in the adjacent streets. I think the city is doing more harm than good with this project. I am not at all opposed to infill projects, and development where it is appropriate. This landlocked site with very fragile and incredibly important habitat adjacent to it, along with it's restricted points of access is not a good fit for McKinley Village.

I would urge the city to reconsider and attempt to modify the current project or find a project more suited to the area. Poor planning now will result in poor traffic patterns, pedestrian travel discouraged and wildlife impacted for our lifespans and those of our children. This does not seem like a good recipe for success to me.

I once spoke with Mayor Kevin Johnson on the phone during a radio show. I asked him about his commitment to the environment and "greening" Sacramento. We have such a unique and amazing gift in our rivers and the open wildlife areas that still exist. He assured me that his commitment to a green Sacramento was solid and he would do everything he could to further our path in that direction. This seems a major step backward, in my opinion.

Thank you very much for you consideration,

Tiffanie Simpson

Friends of Grant Park
Friends of the River Banks
Friends of Sutter's Landing
Chair, Alice Birney Waldorf Inspired K-8 Parent Guild
Sacramento Parenting Partnership

Dana Allen

From: michael murphy <michaelmmurphy4@gmail.com>
Sent: Thursday, January 09, 2014 5:39 PM
To: Dana Allen
Subject: McKinley Village - Draft EIR comments

Dear Ms. Allen:

I would like to point out than when scientific documents make faulty assumptions then all of the resulting data and results will be false. The Draft Environmental Impact Report ("DEIR") assumes that there will be only 2 people per home ("PPH"), yet the California Department of Finance projects there will likely be 2.66 people per home. This assumption includes condos, apartments, and more dense housing, unlike the large single family homes in McKinley Village. This inaccuracy will not only create false data for this project but for future projects as well. This PPH is not consistent with another nearby project. Specifically, the other East Sacramento project, The Sutter Park project, is using 2.54 PPH to evaluate its impacts on the community. Why is McKinley Village using a considerably lower number?

Also, residents were very disappointed with the way the traffic study was presented. We feel that it was confusing, didn't study or report all of the impacts on the Midtown side, and wasn't presented in a way that the average lay person could understand.

On page 4.9-59, the first line below Railroad Crossings it states that there will be a "net increase of about 1,800 daily trips to the at-grade railroad crossing per day". Please compare this to Table 4.9-51. On 28th Street, between C Street and E Street, you have an increase 1122 cars. On C Street, west of 28th Street, you have an increase of 198 cars. This gives a total increase of 1320 cars. What is the correct number of cars using the A Street access for McKinley Village?

Figure 4.9-13 also shows to figures 1800 (3600) cars from A Street. Does that mean we can expect 1800 cars or 3600 cars? Please account for the discrepancies. The numbers are off by 480 cars per day, unless you assume that 480 cars are going to Sutter's Landing Park. An addition of 28 cars would be enough of an increase to be considered a significant impact on 28th street between C Street and E Street which is considered a local street, as the projected traffic numbers are 4,972 cars per day. This would create an F level of service for this street. This is contrary to Policy M 4.3.1 which states: "The city shall continue wherever possible to design streets and improve development applications in such a manner as to reduce high traffic flows and parking problems within a residential neighborhood." The traffic generated by McKinley Village is not consistent with this policy. How will this issue be addressed?

Please look at pedestrian and bicycle safety from C Street to A Street on 28th Street. There is not a proper sidewalk or bicycle lanes to accommodate cyclists or pedestrians. Also, Stanford Park isn't ADA compliant. The sidewalks aren't wide enough for wheelchairs. We ask that some of the money the developer fees will be used to make proper upgrades. We will have an additional 1,800 car trips generated per day across the railroad tracks at 28th Street. (Policy M 5.1.4 "The proposed project shall not result in conflicts between bicyclists and motor vehicles on streets, and pedestrians on multi-use trails and sidewalks. 4.9-37)" How will the McKinley Village developer address this issue?

Please also consider the following:

1. Sutter's Landing Park currently has only one traffic sign that states "Slow to 25 mph for speed bumps." Adding 1,800 cars, without a reasonable posted speed limit, isn't safe for pedestrians, bicyclists, and current users of 28th Street.
2. 28th Street, going over the train tracks, which is about a 12% grade has a poor sight line, that isn't safe for bicyclists or pedestrians. The project applicant and the City of Sacramento didn't address in a way that the lay person can understand how this issue would be addressed. With this poor sight line, the project applicant should widen 28th Street enough to create separate bike lanes and pedestrian access.
3. With the additional traffic, B Street, between 28th and 29th Streets, needs ADA compliant sidewalks that comply with the court order that the City of Sacramento is currently under. If this area is to become a residential development then amenities such as sidewalks needs to put in place.
4. Stanford Park has sidewalks that are only 3 feet in width. With the additional 1800 car trips and increase user- ship of the park, the City of Sacramento and the applicant needs to make these sidewalks ADA compliant.
5. Sutter's Landing Park doesn't have sidewalks. Sutter's Landing Park will suffer due to the increase user-ship of the park and the additional 1800 cars per day, Sutter's Landing Park needs sidewalks for maintain pedestrian and bicycle safety. If the City of Sacramento is going to make this a residential area, then the appropriate amenities need to be constructed and paid for by the developer, not with city tax dollars.
6. Between the Sutter's Landing Park monument sign and the methane recycling center, there is a poor sight line for cars, pedestrians, and bicyclists currently using 28th Street if the applicant uses A Street for traffic coming out of McKinley Village. This potential hazard needs to be addressed.
7. The City of Sacramento and the applicant failed to notify residents, when the DEIR came out, that A Street and 40th Street would be changed from a "local street" to "minor collector" streets. We request that before a FEIR is finished that the City of Sacramento notifies all interested parties and give them the opportunity to respond to these changes.

On top of the inadequacies presented above, we believe that residents have presented two options that will preserve our quality of life and preserve livability in our neighborhood. Our ideal solution would be to put a half-street closure at 28th Street and B Street. This would be the best solution for residents on the Midtown side of the project. If the City of Sacramento couldn't do that then I would support a half-street closure at 28th and C Street, with enough traffic calming measures to protect C Street. Whatever improvements are undertaken should be paid for by the developer.

I would also ask that you consider putting in speed tables by Stanford Park to slow additional traffic generated by this project. Also, a speed table between the at-grade train crossing and the entrance to the project on A Street will aid in slowing traffic. This will increase safety by slowing traffic for bicyclists and pedestrians.

At 4.9-40 "The number of project trips on east-west local streets between C Street and I Street is somewhat limited due, in part, to the previously discussed half-street closures in place on the

roadways, with the exception of C Street, which doesn't have a half street closure." There isn't a half-street closure on I Street. Was this figured into the EIR? Why wasn't it mentioned?

Figure 4.6.4 shows that a portion of the project land belongs to Sutter's Landing Park (See Sutter's Landing Area Master Plan Background Report dated 10/1/08, pg.19). What community benefits is the developer going to give to Sutter's Landing Park for taking that land plus the extension of A Street? Is the developer going to try to consider this land part of the park land so that he won't have to pay park fees? Why wasn't this discussed in the EIR?

Also, there was not traffic study on F Street, G Street, or I Street. They don't have street closures blocking traffic on 28th Street (4.9.4). We feel that your analysis is incomplete on these streets.

What will the impacts be on the E Street on ramp and off ramp? Will this intersection reach an F level of service? Please continue to provide me with updates on this project. I look forward to seeing this issues addressed. Thank you.

Michael Murphy

January 9, 2014

City of Sacramento
Community Development Department
Dana Allen, Associate Planner
300 Richards Blvd., 3rd Floor
Sacramento, California 95811
dallen@cityofsacramento.org

Dear Dana,

I am submitting my response to the DEIR for the McKinley Village project.

I am endorsing and supporting the East Sacramento Preservation's response to the DEIR. I agree with all points that they addressed in their 22 page response.

As indicated in their response on page 1 "it is quite clear that the planning process is inherently flawed and broken with regard to citizen involvement in the ability to shape the future direction of our city...The hard copy that I have appears to be well over 1,000 pages long. The appendices check in at another 4,000-plus pages. On top of that a reviewer will have to read hundreds of pages of the General Plan to put this project in context. To expect that residents, between their work, family and personal lives, will realistically have the time to read and comment on the volumes of data, assumptions, figures, tables, etc. that supposedly construct an argument that the proposed project will have no significant impacts on the environment is, frankly, ludicrous."

I honestly don't know how the City of Sacramento expects any resident to review over 1,000 pages. I went through some pages but in all honesty could not possibly read all of this unless I wanted to make this my full time job until I finished reading everything.

I am still totally against this project for many reasons. The DEIR did not give me any comfort in addressing my concerns and so I want to point out my original concerns and new concerns:

- Additional Traffic that will impact the East Sac and Mid Town community. The DEIR does not address the many additional drives the new residents of McKinley Village will do to get to schools, grocery stores, restaurants, shopping, post office stops, visiting friends/family, visiting parks, driving to/from work etc.... There are no services for the McKinley Village residents besides accessing the services through East Sac and Mid Town. This is too much of a burden for our community.
- The Train situation is still a HUGE concern for me. The A Street location will have cars at a standard gate crossing at the tracks vs. the 40th St/Tivoli location will have an underpass. I am highly concerned still that this will put undue burden of cars going through the 40th St/Tivoli underpass location and then more traffic into the East Sac community. I lived in a suburb in Seattle where we had standard tracks crossing at the bottom of our house. The only way to get to I5 was crossing the standard tracks. There was always a ton of traffic because of the congestion of the track crossing. If there was an alternative to go under the train tracks, I would ABSOLUTELY have done that. I would never do the train tracks option. I believe most of the residents in McKinley Village would also choose the smart route of going through the 40th St/Tivoli underpass option instead of the A Street train tracks route. This will add even more trips through the East Sac community putting more of burden on our streets.
- There are no true public transportation options for the McKinley Village residents. Expecting that someone will walk over .6 miles to get to a bus stop when the bus does not run very frequently is just goofy. That bus line only runs every hour and stops at 5pm and does not run on the weekends or holidays. It makes this bus line useless. There have been many times where we wanted my husband's mom to take a bus to our house from South Land Park (because she doesn't drive) but she can't because the bus #34 near our house (at Santa Ynez Way and McKinley Blvd) does not run that often. On top of this, a person who has physical limitations including the disabled and the elderly would not be able to walk that far. I have a muscular dystrophy and can walk short distances using braces for me feet. I can get to the bus stop at Santa Ynez Way and McKinley Blvd but I would not be able to get to J Street. I have to drive because of the distance everything is for me. I highly doubt people who are residents in the McKinley Village project will walk from their neighborhood to East Sac to pick up the bus. There really needs to be more public transit options in their neighborhood.

- There will be more congestion (not less) on Business 80 heading towards Cal Expo due to the increase in additional residents from McKinley Village. It is already a huge problem and the Dept of Transportation is trying to find ways to address this congestion including closing the E Street on ramp (WHICH IS LUDICRIS). Adding more cars onto the freeway with these new residents will not decrease traffic.
- If the Dept of Transportation is even considering closing the E Street on ramp, it will force a major congestion on surface streets in East Sac and Mid Town. I think this will be a HUGE BURDEN on the current residents. Then add on more residents from McKinley Village that will have to go through more of the East Sac and Mid Town streets to get to a further distance on ramp will make this absolutely ridiculous.
- The parking situation in certain neighborhoods has not been addressed at all. For example the parking situation is already bad at Orphan's and will only get even worse with additional residents from McKinley Village. People park off street to eat at Orphan's (since there is only a tiny amount of parking for patrons). People have to park on 35th St, C Street, D Street. I use to live on D Street. We used to have parking permits on that street but it got removed 1 ½ years ago. It was a mistake because now the parking has gotten so bad. My neighbor had her driveway blocked in because of people eating at Orphan's. If you have more residents who have no services in their neighborhood, where will they go to eat...In our neighborhood.
- I still think there are way too many single family homes being considered for this project and the type of homes are so limiting to so many demographics. I am a disabled 37 year old female. I have challenges walking due to my muscular dystrophy and have a very hard time with stairs. I specifically bought my home on Santa Ynez Way because it is a one story home (plus all the wonderful old world charm that makes this neighborhood a dream to live in). So many developers these days are only building two story homes. It is even more frustrating when you have investors buying up homes in our neighborhood that are a one story home so they can demolish it to put up a two story big home. This strategy will push out all people who need or want a one story home. The builders of this project are proposing only 2 story homes which eliminates so many people who need 1 story homes...including elderly, disabled, etc...
- The developers say they are trying to make these homes to the style of the East Sac area. This is farthest from the truth. Are they putting in REAL hardwood floors with inlay? Are they putting in leaded windows? Are they putting in glass door knobs? Are they putting in solid brick homes? Are they putting in mature Sycamore trees or other mature trees? The answer to all of these is NO. These features (and many others) are what makes East Sac a neighborhood people desire.
- McKinley Village really needs to have its own off/on ramp to the freeway to not burden other neighborhoods. McKinley Village needs to have its own services including schools, grocery stores, and restaurants to not burden other neighborhoods. McKinley Village needs public transit options that are in their neighborhood. McKinley Village needs a variety of housing options for many types of demographics.

There are plenty of other things to address including pollution, noise, flooding concerns, etc...But I do not have the time to address these other concerns.

The East Sac and Mid Town community takes on the majority of the downside while the owners/builders make a ton of money at our expense. Please do not allow this project. This is not a good use for this land.

Sincerely,



Cheryl Sherman

Resident of East Sac since 2009

440 Santa Ynez Way

Sacramento, CA 95816

916-969-8226

cheryl@5-wheels.com

Dana Allen

From: Judy Mc <judys.place@live.com>
Sent: Thursday, January 09, 2014 5:56 PM
To: Dana Allen
Subject: McKinley Village DEIR comment

There was a comment on East Sac Watch a few weeks ago about drag racers on McKinley Blvd. This is a good example of what drivers will do when frustrated. This DEIR for McKinley Village says there is no increase in LOS but so did the Mercy EIR - no change in LOS! Yet there is an increase in LOS on H St and it seems to be increasing as people use H St to access the hospital and schools, freeway etc. and avoid the lights and slower traffic on J St! ... and the Heart Center is not officially open yet! With this increase load on H St comes commuter frustration and it overflows into the neighborhood with speeders and trucks on neighborhood streets - including trucks ignoring truck routes etc. This is going to also happen when the cars get tired of the speed lumps (33rd to Alhambra on C St) and divert up 33rd, 34th, 35th Sts. etc. to McKinley and every other direction. Cars back up 7-8 blocks at times from /Alhambra-30th St on H St. at commute times and school times. Only traffic in a very small area around the project was even considered in the DEIR. The traffic from this project extends to the schools that would be used and shopping areas.

How can you have an estimated population of 656 in 328 houses that have more 3-5 bedroom houses with granny flats? Given this estimate to be grossly under estimated means the estimate for car trip per day is also grossly underestimated. I understand the estimate for elementary children in this development to be around 95-230. This also does not support the estimated number of people per household. Some houses will have 5-6 people. There are many larger homes (3-5 bedroom) in McKinley Park in which there are 3-6 people living.

They are proposing a traffic signal at 33rd/McKinley Blvd. This suggests THERE IS an impact on traffic just using their low number of estimated car trips AND a signal will also mean cars backing up polluting the neighborhood with fumes while sitting for red lights.

We dealt with construction traffic issues with the Mercy Project and the rules were frequently ignored and all the traffic from the trucks etc. impacted the neighborhood outside the immediate few blocks of the project. Workers parked in the neighborhoods, heavy equipment trucks pounded the pavement early in the mornings (noise), and traffic was compromised with streets being blocked for loading/unloading. This is not a project in McKinley Park. All work, staging, supplies, and equipment should be confined to the area between the tracks and freeway.

Interesting that no post project EIRs are done to further mitigate what initial inadequate EIRs said was no impact though it turns out are! An evaluation of how well the company did with the initial EIR should be done to determine whether they qualify for doing future EIRs. EIR companies are hired by the developer and thus there is a built in prejudice. When was the last time an EIR said something like traffic was significantly impacted?

Usually there is a time gap of a few years before a new major project is proposed requiring an EIR. Each time an EIR is done the increase in LOS is compared to what is already existing, i.e. the increase from the prior EIR that stated no significant change in LOS. Thus with each new project the amount of traffic is every increasing over time. Well now there appears to be some since some mitigation is proposed, i.e. a light at 33rd St./McKinley Blvd.

The issues that have not been taken into account with this DEIR are that not only will this project further impact the level of traffic that already exists, but no accounting was taken for the additional traffic from the Cannery Business Park when they do their expansion plans and draw more business traffic into the neighborhood.

There is no requirement that homebuyers sign and adhere to a "bike to work policy". Only 2.2% of Sac population now uses bikes to get to work. Thus there will be a minuscule impact with a proposed bike access. And another point, when commuters in cars get frustrated with traffic they start using bike lanes as a passing lane. Lots of the population does not work where they live...just look at the freeway commute traffic patterns, even from Sac to Roseville in AM or Elk Grove to Sac. What do you suppose traffic will be like if CalTrans closes the E Street freeway ramp? Promoting this project as a place for people to live close to work is a fallacy!

McK Village indicates that sound barriers will be in place. Buildings that are 2 stories hear lots more noise than single story houses. Those that live in 2 story homes know this fact! A sound barrier would have to be 2+ stories high to stop the noise effect. Who wants to live in a 2-story house next to a wall 25+ feet tall between them and the rail tracks or freeway? That is like opening your windows to a brick wall – no view! Without a wall that high the noise cannot be mitigated for 2 story houses. Then there is the issue of who will clean up the graffiti facing the track (into East Sac) and freeway?

The project has a pool, but does not appear to have tennis courts, playground equipment, basketball court etc.

The MV population will come to the McKinley Pond/Playground with their children and be exposed to the June 2013 report documenting it as a "Human Health Hazard" for coliform (including salmonella) - City did not test for Giardia or Champhobacter levels. This is a major safety hazard and the City is doing nothing about it while spending money on aesthetics in other parts of the city not withstanding funding an arena. Other ponds in city did not come near as high for coliform as McKinley Pond's levels. This development is bringing more children to the pond area. Children need protection. (I have copy of City's 6/2013 report.)

Sacramento already has one of the lowest percentages of parkland to city area (8.1%) with a poor maintenance (they blame on 2007 recession) though it existed long before that. The City wants to make this fact worse with infill and get public funding for parks through "adopt-a-park" 501.c3 groups, diverting capital improvement funds to esthetics not safety.

The City needs more open natural green space - the Cannery is industrial, the trains are industrial and freeways are already polluting the area, there would be no need for digging additional access routes through the levee/rail lines. If CalTrans closes E St ramp the impact of cars from MV would not be an additional issue over what now exists.

Neighborhoods should have a greater say of what they want happening where they live. This project is not being proposed by any existing neighborhood entity. It has never had a neighborhood with streets, water and sewer. It

is a "new growth area" though this DEIR say otherwise in an attempt to get exemptions to existing rules. But it does dramatically impact the McKinley Park neighborhood quality of life expected by those of us living here.

This DEIR seems to be doing its best to prejudice and deceive the readers with deceptive wording, assumptions, tunnel vision, missing information, and numbers that have no basis. This project reeks of one purpose, get the project approved by any means and too bad for what impact it has on the neighborhood livability or what the neighborhood wants or what actual quality of life might be for the people who buy ignorantly into the project.

The City's General Plan is there for a purpose. If anyone can come along and change the rules, descriptions etc. to fit their project, what is the purpose of the Plan?

Judy McClaver
35th St

January 9, 2014

Attention: Dana Allen, associate planner, City of Sacramento, Community Development

We live in East Sacramento, two blocks off Elvas. We have several major concerns about the proposed McKinley Village development outlined in the DEIR. Please include these issues in any document that will go before the city council for approval.

1. The advisability of developing inaccessible property.
2. The advisability of compromising the city's and East Sacramento's/River Park's secondary levee by tunneling beneath the railroad tracks and adding "flood gates."
3. The advisability that, in the event of a flood, someone actually would "close" the flood gates to prevent flooding, thereby trapping residents in the suggested fish-eye development. It would be a difficult decision for someone (who?) to make: to put the residents of East Sacramento or the residents of this proposed property at risk.
4. The advisability of adding children from this development to East Sacramento's already overcrowded, impacted schools.
5. The advisability of adding even more traffic to East Sacramento streets, when it is now nearly impossible to cross H Street or make a left-hand turn onto H Street during daylight hours.
6. The advisability of adding water and sewer usage to an antiquated East Sacramento system that already is overburdened. Our concerns are especially relevant due to the official drought Sacramento is now experiencing.
7. The advisability of building 328 homes and condominiums in an area with no public transportation.
8. The advisability of adding demand for East Sacramento's police and fire services.
9. The advisability of building 328 homes and condominiums near Cal Expo. The noise from Cal Expo negatively impacts our neighborhood already, and this proposed property sits even closer to the public facility. Upcoming concerts and events (soccer is now being proposed until a soccer stadium can be built) surely will impact any homes built in the proposed McKinley Village area.

Observation: We believe that the presentation materials for the McKinley Village project are misleading. A few examples:

- a. Architectural renderings show established, mature trees and landscaping – even though it could be 30 or 40 years before such a tree canopy would be realized.
- b. The visual perspective shows wide streets, implying the 'feel' of broad boulevards; the streets show no automobile/truck traffic or parking.
- c. Horizon renderings fail to show the scale of railroad cars and freeway cars/trucks, even though those images will be visible over proposed sound walls and shrubbery.

Thank you for giving us the opportunity to express our concerns about this project.

Rhoda McKnight
H. Susan Wells
146 Coloma Way
Sacramento, CA 95819

(916) 457-7670
rhoda@cwo.com

Dana Allen

From: JoEllen Arnold <joellenarnold@mac.com>
Sent: Thursday, January 09, 2014 8:41 PM
To: Dana Allen
Subject: McKinley Village Project

January 9, 2014

Concerns about McKinley Village Project:

How much additional traffic will be passing in front of my house on C Street between 22nd and 23rd Streets after the project is completed? Many people heading to work downtown will see this as the most direct route from McKinley Village, yet this street was not part of the traffic study, nor were many other parts of the Midtown neighborhood.

How many large trucks will use C Street between 28th and 19th Streets during construction? According to the traffic calming agreement of about 10 years ago under Steve Cohn's watch, this section of C Street is not supposed to be a truck route but it is so designated on city maps.

What will be the impact of the project on pedestrian, skate board and bicycle access into Sutter's Landing Park? The rail crossing and steep slope of the street approaching it are already very dangerous without the added traffic of the project.

My major concern is for the health and safety of all of us who live in the existing surrounding neighborhoods and for the possible future residents of the proposed McKinley Village, who will be surrounded by rail lines and a major freeway in a dense neighborhood that will be prone to flooding. Just not a good idea.

JoEllen Arnold
2210 C Street
Sacramento CA 95816

January 9, 2014

Dana Allen
Community Development Department
300 Richards Blvd., Third Floor
Sacramento, California 95811

Comments on the DEIR for McKinley Village, Project PO8-086

Ms. Allen:

I am a 36 year resident of East Sacramento. For the past 21 years I have lived in the Meister Terrace tract which directly abuts the Elvas/C Street corridor. My home is three houses in from Elvas Avenue. I am not a soil engineer, an architect, a builder, nor an air quality specialist. I am a social worker. I approach my arguments from that perspective. (Please note that my enumerations do not necessarily correspond to the DEIR sections.)

1. Schools: My daughter attended Theodore Judah and Sutter Middle Schools. When she was at TJ in the 1980's, at least two portable classrooms were moved onto the school grounds to accommodate the number of students enrolled at that time. Those classrooms are still located at Theodore Judah School. Sutter Middle School in the 90's was at or exceeded capacity. I am sure that is still the case.

I therefore dispute statements in the DEIR that indicate there is availability of room for more students in our neighborhood schools. I do not understand how the DEIR authors can say with any truth that there is room to accommodate an additional 130+ students from McKinley Village.

2. Traffic: The traffic study was amazingly inept in measuring actual traffic issues in this neighborhood. I know of at least two accidents (one fatal) at the intersection of 36th Way (my street) and 40th Street (the 'connector' for McKinley Village). Thirty-sixth Way is a through street from Elvas to H Streets. This street is already a fully utilized street for traffic going both ways (from H Street North and from Elvas Avenue South) because there are few stop signs, no RT bus traffic, and no traffic modulators. Drivers regularly enter 36th Way from Elvas and make u-turns in front of my home and my neighbors' homes. I have to exercise extreme caution when entering or exiting my driveway because vehicles appear almost instantly! Drivers routinely exceed the 25 mph allowance on neighborhood streets.

YET! There was NO traffic camera placed at the intersection of 36th Way and Elvas! A stupid oversight or intentional oversight? Drivers already know this street exists; it is a wide street at Elvas. Does the city traffic engineer truly think that we will not be impacted by increased traffic from vehicles entering or leaving the proposed McKinley Village development?

Meister Terrace is a walkable neighborhood. Many of my neighbors (one of whom has lived in his same home for 65 years!) regularly walk in this neighborhood. People push strollers, walk dogs, and in some cases use walkers or motorized chairs/scooters, to move about this lovely area.

It was quite evident in studying the DEIR that there was a complete failure of any human on-site observation done in this neighborhood – traffic-wise, home-wise or otherwise. Meister Terrace is the major neighborhood that will be impacted by McKinley Village. Our streets will be flooded by vehicles at particular times of the day: morning and evening commute times. There is NO PUBLIC TRANSIT in this neighborhood, except the #34 bus which is located over ½ mile from the project entrance at 40th Street.

That bus route will cease to exist either when Steve Cohn leaves office, or when Sutter Memorial Hospital is gone. As it now stands, the last bus runs at 5 p.m. and only on the hour during weekdays.

3. Land Use, Planning and Population: The homes to be built in McKinley Village do not – in any way - resemble the homes in Meister Terrace. Most of us in MT have only one car garages – many of our homes have no garages. There are few two car garages. Two storied homes are the exception, not the norm in MT and exist mainly because of remodels and add-ons. There are many multi-family residences (duplexes) in MT – Elvas Avenue and C Street s are lined with duplexes. Not in McKinley Village. Most Meister Terrace homes were built post WWII as 2 bedroom or 3 bedroom, 1 bathroom homes of around 1200 square feet. They are modest homes. Modest does not begin to describe the proposed homes to be built in McKinley Village.

We do not have Homeowner's Associations in Meister Terrace. McKinley Village will be isolated from Meister Terrace, with those residents only using our neighborhoods to drive vehicles on our streets to get to shopping areas, employment and schools. The proposal indicates that McKinley Village will be an addition to our neighborhoods. How so, I ask? There will be absolutely no reason for me or my neighbors to go into McKinley Village (except to gawk) because there are no plans for retail establishments or eateries. The swimming pool and parks will be for the residents of McKinley Village, unless by invitation.

The impact of these proposed 328 homes, the residents of same, the vehicles required to get in and out of the project, will be on our neighborhood. There will be no interaction between the two neighborhoods. McKinley Village will be an 'elite village', not a neighborhood meshing with our neighborhood.

4. Finally, I have great concern about the cavalier disregard in the DEIR for the health concerns of future residents of McKinley Village. As governing bodies, the City Council (and others) should be first and foremost concerned about the physical and mental health of its citizens. There will be more incidences of cancer because of the immediate exposure of those residents to pollution from the freeway and from the trains. There will be increased incidences of respiratory failures, heart failures and general malaise, because of this increased exposure to air pollution.

Pregnant woman, or parents of very young children, ought to be very concerned about and afraid of, what affect those increased pollution levels will have on developing fetuses and toddlers. The city officials should be extremely concerned about their liabilities in failing to show care and concern for these eventual outcomes.

The people who wrote the DEIR and the City Council members as well as staff, should feel ashamed for pushing this environmental report as unbiased and 'nothing to worry about' with the development of McKinley Village. I wonder who of you will choose to reside there in the 3,000 square foot houses that have windows that won't open (air pollution) and sound walls (noise pollution) closing off any possible view or sunlight.

There is absolutely no justification for building homes in this area of East Sacramento. It is completely inappropriate to put homes in a geographic bowl with the threats of exposure to toxins, poor health and potential groundwater issues, flooding and train derailment concerns.

Sincerely,

Jennifer H. Cummings
50 36th Way
Sacramento, California 95819
(916) 731-7143

The Legrand Family
2730 F Street
Sacramento, CA 95816-3716
LLLegrand@sbcglobal.net
916-448-6303
January 9, 2014

Dana Allen
Associate Planner
City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Dear Dana,

The purpose of this letter is to share our comments regarding the proposed McKinley Village project. We like the idea of an "urban infill" neighborhood and are not generally opposed to a new housing development at the McKinley Village site.

Our major source of concern with this project is the proposed use of 28th Street as one of the two primary entry/exit points for McKinley Village traffic. The addition of 1,800 cars onto our quiet Midtown residential street is unacceptable and illogical.

We know of no housing development in the City of Sacramento (or anywhere else in Northern California, for that matter) where residents are required to use a freeway overpass as their primary point of access. By doing so, thousands of extra vehicle miles will be generated annually, just so that residents can access their neighborhood. The additional air pollution, noise, and safety issues resulting from this plan are readily apparent. The impact on wildlife and quiet enjoyment of Sutter's Landing Park will be overwhelmingly negative. Furthermore, the ability of emergency vehicles to quickly serve McKinley Village residents will be unacceptably compromised.

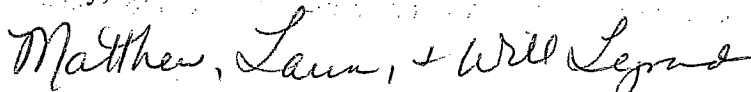
It is ironic that this project is called McKinley Village, and yet its residents have no direct vehicle access to its namesake, McKinley Park. In our opinion, the most appropriate routing of McKinley Village traffic is via Alhambra Boulevard. However, we have heard the developer state on numerous occasions that this is not an option. How can this possibly be the case?

We have owned our home at the corner of 28th and F Streets in Midtown Sacramento for 26 years. We are responsible citizens and taxpayers, and we are good neighbors who contribute to the local economy.

Please do not allow McKinley Village to use 28th Street as a "dumping ground" for its vehicle traffic.

Thank you for your consideration.

Sincerely,



Matthew, Laura, and Will Legrand

Dana Allen

From: Colin Crane <colinc1585@gmail.com>
Sent: Thursday, January 09, 2014 11:35 PM
To: Dana Allen
Subject: Mckinley park traffic impact concern

I am a midtown resident. Specifically, I live on C Street just east of 28th. This of all corridors in Midtown is likely to increase in traffic substantially with the new development. Cars already come speeding past our street turn onto 29th street. It is amazing to me that there is not already a stop sign there. I have a two year old son and I fear for his safety because of the traffic already. I would like to know how the city can help alleviate the impact of increased traffic and speeding cars on our street.

Colin

Dana Allen

From: vitosgromo <vsgromo11@comcast.net>
Sent: Thursday, January 09, 2014 11:36 PM
To: Dana Allen; Evan Compton; Steve Cohn; Sue Brown; 'Jameson Parker'; Peter Fenolio; ILee Muller; Anne Romo; Consuelo Hernandez; Steve Hansen
Cc: 'Alan Parker'; 'Dale Kooyman'; 'Vickie Valine'; mhvaline@gmail.com; 'Burgua William'; 'Karen Jacques'; 'Smith Clara'; smdtyler@aol.com; berdany@aol.com; 'BUSS Margaret'; 'Smith Clara'; 'Ed Trujillo'; Anne Romo; 'DAMJANOVIC Martha'; 'Rhee, Foon'; 'Paul Harriman'; 'Laurie Litman'; 'Paul Tsamtsis'; 'Winger Robert'; 'Marion Millin'
Subject: McKinley Village Proposal Response January 9, 2014
Attachments: SACRAMENTO.docx; Mckinley Village Response 7 7 2013.docx; CA-HSR.pdf; Doc2.docx; Sacramento-Roseville 3rd Track Project.pdf; SR 51 PI Final Signed 01-08-13.pdf

Importance: High

January 9, 2014

Dana L. Allen, Associate Planner
Environmental Planning Services
Community Development Department
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

McKinley Village Proposal Response PO8-086

I am resubmitting my July 7, 2013, see below and attached, response with amendments.

Amendments:

1. Traffic Study.

Study Flaws: The traffic study completed for the McKinley Village project has failed to consider several major urban planning and traffic models that are critical to determine accurate automobile traffic volumes.

Pass-By Traffic

According to the Institute of Transportation Engineers two major considerations for any traffic study that includes new access roads between two established city sections should include, "pass-by" traffic. New developments such as the McKinley Village Project will create a new artery of traffic between the central city and East Sacramento, River Commons and eastern sections of the city of Sacramento, This will have a **20% to 25 %** of increase of traffic above the increases created by daily trips of residents within the housing developments of McKinley Village.

Future Growth

According to the Urban Planning Institute, The Institute of Transportation Engineers and American Association of State Highway and Transportation Officials Guidelines, all new development traffic studies must include calculations for future growth of the proposed new development and the surrounding jurisdictions. According to the existing City of Sacramento General Plan, the Central City current population will grow from approximately 48,000 to 135,000 by 2013. This will be caused mainly by the UP Central City Railyard Infill Project. Also increased east west traffic will also be the result of the Arena Entertainment District. Access to these two major developments will require utilization of the roads that are now planned to connect the McKinley Village project with Midtown and East Sacramento. The traffic study failed to calculate this major impact that can also increase traffic by **20% to 30 %**.

Due to these two major flaws the traffic study has grossly underestimated the full impact of the McKinley Village traffic on the nearby residential streets zoned for only local traffic volumes. If these two factors are used to augment the projected traffic volumes from the completed McKinley Village traffic study then the volume of traffic will exceed the capacity of the locally zoned residential streets.

Recommendation:

River West Investments should re-design the access points into their proposed housing developments to connect with city streets designated as collectors or arterials such as ELvas Boulevard through Lanett and to Alhambra Boulevard.

Vito Sgromo
Cell 916 719-1477

I am writing to respond to the proposal by River West Investments to build 325 homes at the Assessor's Parcel Number 001-0170-028. The project site is bounded on the south and east by the elevated portion of the UPRR tracks and on the north and west by the Capitol City Freeway.

If approved as proposed, this project has major negative impacts to several regional development projects and future area transportation expansions.

1. Sutter Landing Parkway (Richards Boulevard Connector).

The General Plan (<http://www.sacgp.org/index.html>) has identified the future development of a parkway road, Sutter Landing Parkway (Richards Boulevard Connector) as a road that must be built to connect the I50 Highway to the Sutter Landing Regional Park, Route 160, to the major Railyard Central City Development and the new proposed arena and surrounding Downtown entertainment district. The

Sutter Landing parkway is critical to the development of a regional park, the largest urban infill project in the West Coast and the new arena.

Negative Impact: McKinley Village Proposal would if approved would eliminate the Sutter Landing Parkway by abandoning the Elvas Roadway and Lanett route and eliminating the needed land inside the proposed McKinley Village Proposal.

Recommendation: River West Investments must alter their plans by allow enough land for the future Sutter Landing Parkway and abandon the 40th Street underpass and use Lanett Street as the underpass to connect to Elvas Boulevard Road.

2. Union Pacific Railroad Expansion

UP is planning additional train lines (see attached reports, Sacramento Roseville 3rd Track and CAL HSR).

Negative Impacts: River West Investments must set aside sufficient land to allow UP to expand. Also these additional train lines and the train traffic will eliminate the use of 28th Street as an access point for the McKinley Village Housing Proposal.

Recommendation: River West Investments must set aside sufficient land to ensure UP can add the additional tracks. Also River West Investments must designate 28th Street as a bike and pedestrian access since in the near future it will no longer be available for automobile traffic and enlarge the opening at Alhambra for 2 way auto traffic.

3. Caltrans I80 Expansion

Caltrans is planning a future expansion of the I 80 Highway that borders the McKinley Village Project (See attachment SR 51 PL Final 01-08-13). This should include on and off ramps to connect to the Sutter Park Landing Parkway.

Negative Impacts: River West Investments has not allowed sufficient land to allow Caltrans to expand I80 thereby improving a bottleneck highway, reducing pollution and connecting with the Sutter Landing Parkway.

Recommendation: River West Investments has to redesign its housing proposal to allow sufficient land for the Caltrans expansion and the addition of an on and off ramps to connect to the Sutter Landing Parkway.

4. Traffic Impacts to Local Streets

River West Investments is funding a traffic study on the impacts of their proposal to access 28th and 40th Streets for automobile access to the McKinley Village housing project. According to the General Plan (<http://www.sacgp.org/index.html>) both streets are designated as local streets.

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Caltrans is currently examining the use of the land River West Investments has proposed for their housing project for a major new railyard and maintenance facility for Amtrak trains. Caltrans needs to build a new maintenance facility for Amtrak's Capital Corridor and San Joaquin Corridor trains (See attached Sacramento Bee Article, Friday July 5, 2013)

Negative Impacts: River West Investments if approved would have a very serious impact to the expansion of train transportation in Northern and Central California.

Recommendation: Place a temporary hold on any approval for the River West Investments McKinley Village Proposal until City and State officials determine the final location of the Capitol Railyard.

Conclusion

McKinley Village proposal if approved in its current design would negatively impact several major transportation and development plans including the development of the UP Central City Railyard Infill Project and Arena Entertainment District that are larger in scale than the McKinley Village Project and have not only city but regional impacts.

For the greater good of the city of Sacramento and Northern California I suggest that McKinley Village Project be placed on hold until the new Capitol Railyard location is finalized. Also if the McKinley Village Project is still planned for the current suggested site it must alter its design to allow sufficient land for transportation rail and road expansions and relocation of automobile access to Alhambra Boulevard and Lanett Streets that are designated to handle the increased traffic.

Let me know if you have any questions or if you need further information.

Thank you.

Vito Sgromo

Cell 916 719-1477

SACRAMENTO

State wants new capital railyard

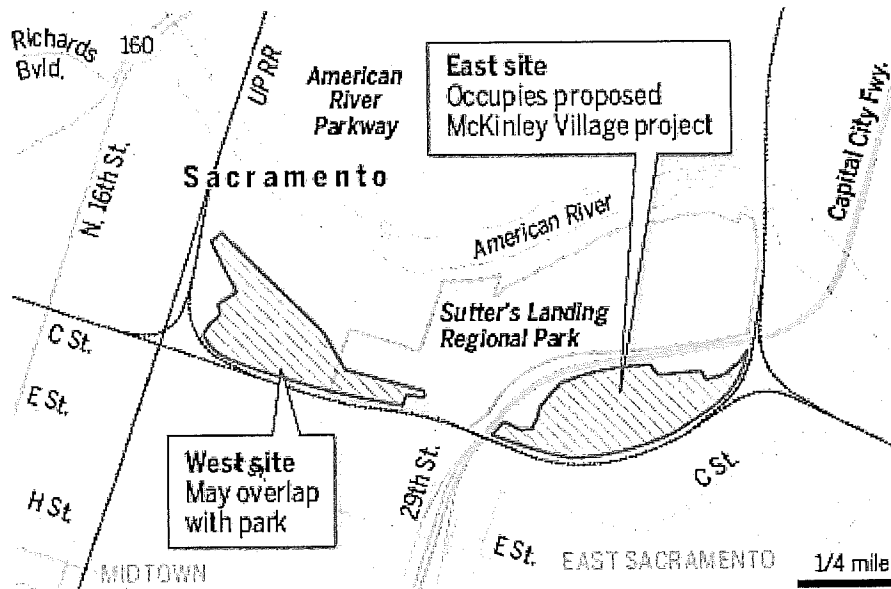
CALTRANS LOOKS AT CITY PARK OR FORMER CENTRAGE SITE AS PLACE TO SERVICE AMTRAK TRAINS

By Hudson Sangree hsangree@sacbee.com

POTENTIAL SITES FOR NEW RAILYARD

Caltrans planners are considering two sites in central Sacramento for a major new railyard and maintenance facility to service Amtrak trains.

Nathaniel Levine
nlevine@sacbee.com



Sacramento has spent decades cleaning up and finding new uses for two historic city railyards. Now the state of California wants to build a new one in the urban core.

State transportation planners are looking at sites in east Sacramento and at Sutter's Landing Regional Park along the American River, as places to build a major new railyard and maintenance facility for Amtrak trains.

Word of the state Department of Transportation's plans spread in the last few days and surprised city officials and developers hoping to build hundreds of homes on the east Sacramento site.

"We just learned about it this week," said Megan Norris, vice president of Riverview Capital Investments. The firm, headed by former state Treasurer Phil Angelides, has been promoting plans to build Mc-Kinley Village, a 328-home development, on the vacant swath of land by the Capital City Freeway. The property is commonly known as Centrage, after one of several failed projects there.

Sacramento City Councilman Steve Cohn, whose district contains both areas under consideration, said the revelation that Caltrans was looking at the sites to service Amtrak trains "came as news to me."

He said any plans to put a railyard at Sutter's Landing Park, built atop a former landfill, would be unacceptable. A map of the proposal suggests the railyard could impinge on city parkland. Even if it didn't, Cohn said the city is planning to expand the park by acquiring acreage now in private hands. "We spent a lot of time and effort to convert an industrial facility into a park," he said.

Caltrans spokesman Mark Dinger said the department's plans are preliminary, with the two Sacramento locations being evaluated.

"We are going to be in discussions with the city of Sacramento on the proposed sites," he said. "However, it will be some time before a determination is made."

Caltrans, he said, needs to build a new maintenance facility for Amtrak's Capital Corridor and San Joaquin Corridor trains. The current maintenance facility in Oakland is at or near capacity, he said. "They want to develop another one for future needs."

A Caltrans project description says the Federal Railroad Administration last year awarded it a \$168 million grant to buy six locomotives and 42 passenger cars to bolster the two lines, and the Oakland facility will be unable to maintain all the new cars.

A new facility would provide inspections and repair, along with refueling, food restocking and cleaning of the interior and exterior of trains.

A Caltrans rendering of the proposed maintenance facility on the 48-acre McKinley Village site shows 28 tracks with shops to service locomotives and coaches. It includes buildings for contractors and administrators, employee parking and a train wash.

Cohn said he would be open to the facility at the Mc-Kinley Village site, where some neighbors oppose the proposed housing development. The area is walled off from existing neighborhoods by a 20-foot elevated rail line and sits beside speeding freeway traffic. Noise mitigation measures might be put in place, and modern rail facilities tend to be cleaner than their 19th and 20th century predecessors, Cohn said.

News that central Sacramento might get a new rail-yard arrived the same week that state environmental officials approved a toxic cleanup plan for the central shops section of the downtown Sacramento railyard. The area was a locomotive manufacturing and railroad maintenance facility for 130 years, leaving numerous contaminants in the soil. The 240-acre former Southern Pacific railyard is being readied for redevelopment as an extension of downtown with housing, offices and stores, as well as a major railroad technology museum.

At another former railyard in the Curtis Park neighborhood, developer Paul Petrovich spent \$30 million cleaning toxics from the soil. He plans to build 268 homes and retail shops on 72 acres near Sacramento City College. Construction is expected to start soon.

To address the prospect of a new railyard, Cohn and city staff members are planning to meet with Caltrans officials Monday to learn more about their plans.

“We know our region better than they do,” Cohn said.

McKinley Village developer Norris said she had spoken briefly with Caltrans officials earlier this week. She said she came away with the idea that they preferred the approximately 54-acre site at Sutter’s Landing because it is at-grade with the existing rail line.

“If they decide it’s going to be our site, we could have to look at it,” she said.

The McKinley Village site was once owned by Caltrans but is now controlled by developer Angelo K. Tsakopoulos. The former peach orchard has seen a series of development plans defeated by neighborhood opposition.

The failures included a high-rise office, apartment and hotel development plan in the early 1990s called Centrage. Many area residents still know the land by that name.

The current housing plan has already ignited debate about whether it’s the best use for the awkward site.

Norris said the property remains zoned industrial and could easily accommodate the rail plan. But the McKinley Village plan for leafy residential streets, with a central park and walking paths is a better option, she said.

“We have every intention to move forward with this project,” Norris said. “We think it’s a great project and the best fit for the surrounding neighborhood.”

Call The Bee’s Hudson

Sangree, (916) 321-1191. Bee staff writer Tony Bizjak contributed to this report.

July 7, 2013

Dana L. Allen, Associate Planner
Environmental Planning Services
Community Development Department
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

McKinley Village Proposal Response PO8-086

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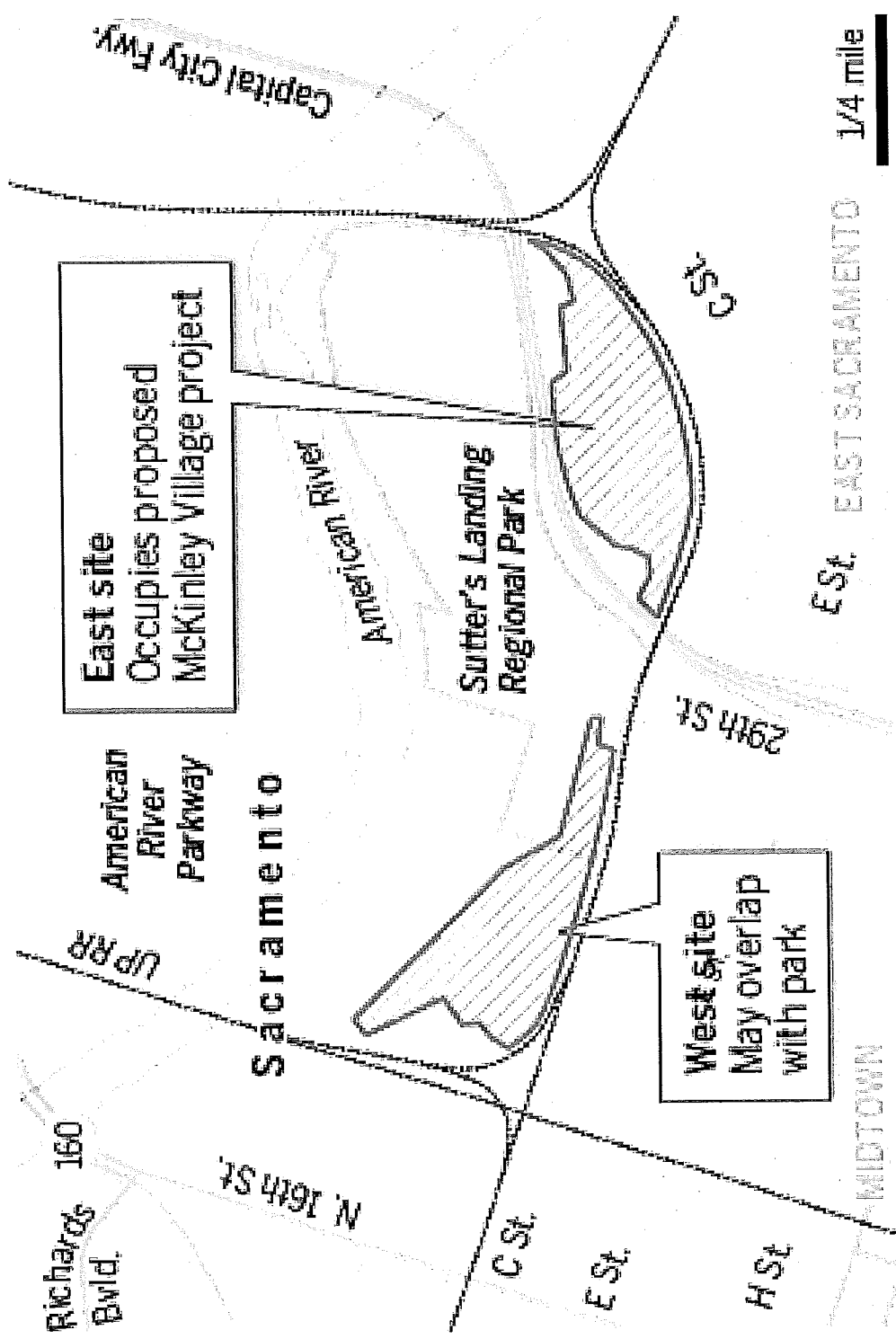
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POTENTIAL SITES FOR NEW RAILYARD

Caltrans planners are considering two sites in central Sacramento for a major new railyard and maintenance facility to service Amtrak trains.

Nathaniel Levine
 nlevine@sacbee.com





MEMORANDUM

TO: PCTPA Board of Directors **DATE:** March 27, 2013

FROM: Celia McAdam, Executive Director

SUBJECT: **PRESENTATION: THIRD TRACK RAIL PROJECT BETWEEN
SACRAMENTO AND ROSEVILLE**

ACTION REQUESTED

None. For discussion only.

BACKGROUND

The Board has a long-standing policy to aggressively pursue additional passenger rail service to Placer County. This has involved working closely with the Capitol Corridor Joint Powers Authority (CCJPA) in addressing the interests and needs of Union Pacific (UPRR) as we pursue their permission to add passenger trips. After more than 20 years of these efforts, we still remain at one round trip per day.

Hopes were rekindled in 2008 when Union Pacific has expressed a willingness to discuss additional passenger service as part of a package of improvements that would benefit both freight and passenger capacity. The improvements can be roughly categorized as follows:

Donner Project

UPRR has long been interested in double tracking an approximately 10 mile segment of their rail line in the Donner Summit area as a way of improving their freight capacity. Trade Corridor Improvement Fund (TCIF) under Proposition 1B was identified by UPRR as a promising source of financing. Requirements for the TCIF include sponsorship by a public agency and a 50% match from UPRR.

CCJPA, with PCTPA concurrence, agreed to sponsor and support UPRR's bid for TCIF funding for the Donner project provided that UPRR allow a second Capitol Corridor round trip to Auburn.

Sacramento-Roseville Third Track Project

Full implementation of the CCJPA Business Plan includes 10 round trips daily to Roseville. It has long been challenging to negotiate this with UPRR, as Roseville is home to the largest freight yard west of the Mississippi, providing a convergence of UPRR's Donner and Feather River routes that connect California to the rest of the US. The Sacramento – Roseville section is a particular area of freight traffic congestion that UPRR would like to address.

The specific project being considered to improve both passenger and freight rail capacity is to add a third track between Sacramento and Roseville, and potentially move the Roseville rail station to a location that would reduce impacts to freight traffic.

PCTPA Board of Directors
SACRAMENTO-ROSEVILLE THIRD TRACK PROJECT
April 2013
Page 2

In 2002, PCTPA programmed \$3 million in Regional Choice funds and the Caltrans Division of Rail programmed \$3.3 million in Interregional funds in the State Transportation Improvement Program (STIP) for environmental clearance and design of the Third Track Project.

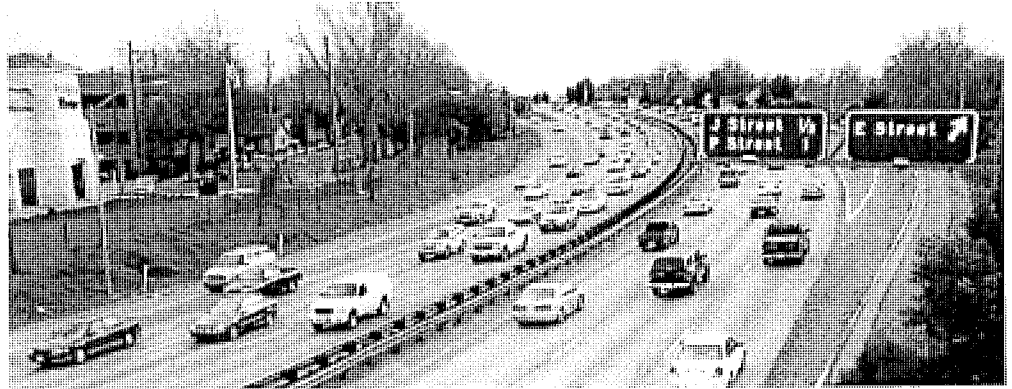
After many years of delays, work is now underway on the environmental phase, including Federal compliance, with completion expected in 2014. Design, right of way, and construction will follow. CCJPA is in the lead for this project, with consulting assistance from HDR Engineering. PCTPA and the City of Roseville are key partners in the effort.

DISCUSSION

In early March, CCJPA and PCTPA were advised that UPRR elected to withdraw their offer to provide the required matching funds for the Donner Project. As a result, the project is no longer eligible to be considered for Proposition 1B funding.

Jim Allison, CCJPA Director of Planning, will provide the Board with a presentation on the Sacramento-Roseville Third Track Project environmental process, along with the identified alternatives and issues.

CM:ss



STATE ROUTE 51 PRELIMINARY INVESTIGATION



Approvals:

JEFF PULVERMAN,
District 3 Deputy Director
Planning and Local Assistance

1-8-13
Date

JODY JONES,
District Director

1-8-13
Date

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INTRODUCTION

The State Route (SR) 51 Preliminary Investigation (PI) is one of a series of studies being conducted by Caltrans District 3, in coordination and consultation with major stakeholder partners, to determine the feasibility and prioritization of improvements to the State Highway System within a segment of the larger corridor defined within the 2009 *Interstate 80 and Capital City Freeway Corridor System Management Plan (I-80/SR 51 CSMP)*, as shown in Figure 1. The PI is the first stage of the project initiation document process, which is the linkage between planning and project development. The PI provides critical initial project scoping and assurances regarding project feasibility and selection, and significantly improves and streamlines the development of the subsequent Project Initiation Document (PID), thereby focusing resources on achieving the most mobility benefits for the least amount of cost.

The SR 51 PI addresses the need for operational and capacity improvements for the entire segment of SR 51 in the City of Sacramento. Candidate improvement projects include Transportation Operation System (TOS) elements, High Occupancy Vehicle (HOV, Bus/Carpool) lanes, and auxiliary/transition lanes.

PRELIMINARY INVESTIGATION NEED AND PURPOSE

There is a need to address the traffic conditions on SR 51 which is currently operating beyond capacity, and congestion and delay will be exacerbated by proposed local land use development in the vicinity and by population growth. Planned development, particularly at Cal Expo, will increase traffic which will degrade travel times, average speed, and other traffic performance measures. The 2009 *Mobility Performance Report (MPR)* identified SR 51 as having five of District 3's top 10 bottlenecks.

The purpose of the SR 51 PI is to create a planning approach that focuses on gaining early consensus regarding needed improvements, determine feasibility, and prioritize projects to reduce congestion and improve traffic operations. This will allow for a coordinated approach to programming (funding) the capital investments to achieve an efficient transportation system based on the most effective improvements. Early and consistent collaboration with local partners and stakeholders is needed to gain a consensus on a funding and programming approach to implement needed improvements within SR 51 to ensure the timely implementation of improvements for continued efficient operation of the highway.

CORRIDOR BACKGROUND

As shown in Figure 2, SR 51 is located in the City of Sacramento and is officially signed as part of Business Loop 80 and named the Capital City Freeway. SR 51 is a route of vital importance to regional and interregional travel and goods movement. It provides a vital link for downtown Sacramento, Cal Expo, and Arden Mall, and it connects two major highways, US Highway 50 (US 50) and Interstate 80 (I-80). It is a heavily traveled facility and experiences significant congestion during peak periods. As growth continues, local land use development will put additional pressure on SR 51.

The 8.9-mile urban arterial freeway runs southwest to northeast and begins at the junction of US 50 and SR 99 as an elevated 6-lane freeway with one Bus/Carpool lane and auxiliary lane in each direction. Between Exposition Boulevard (Bl.) and SR 160, the facility is five lanes until SR 160 when SR 51 becomes an 8-lane facility and then narrows to and remains a 6-lane freeway from SR 160 to its eastern junction with I-80. Bus/Carpool lanes exist between SR 99 and J Street (St.), and auxiliary lanes run in the north and southbound directions between SR 99 and J St. as well as between the Arden Way and Marconi Avenue (Av.) interchanges. The lane configuration diagram is shown in Figure 3.

Figure 1: Interstate 80/Capital City Freeway Corridor System Management Plan Network

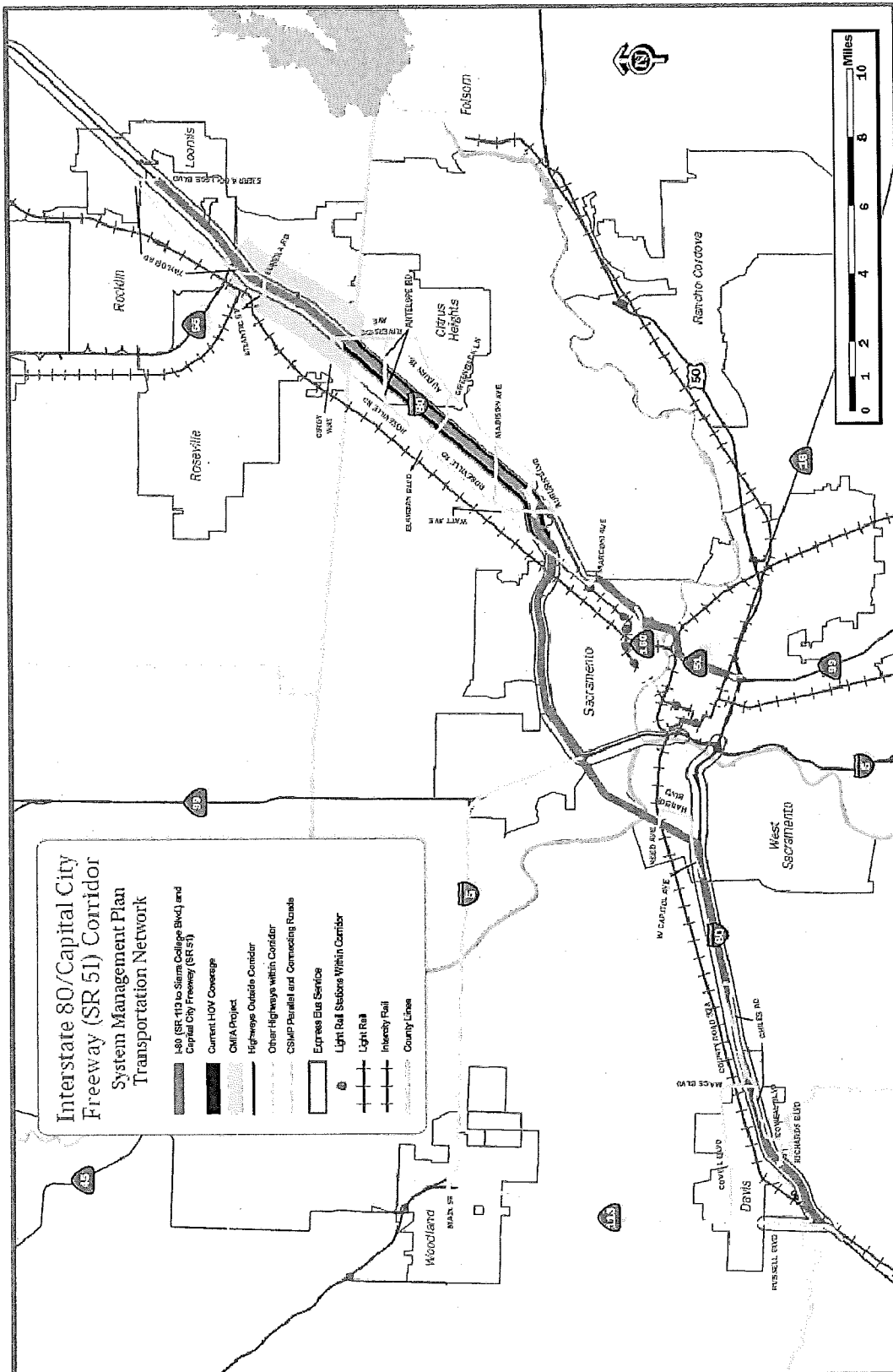


Figure 2: SR 51 PI Project Area

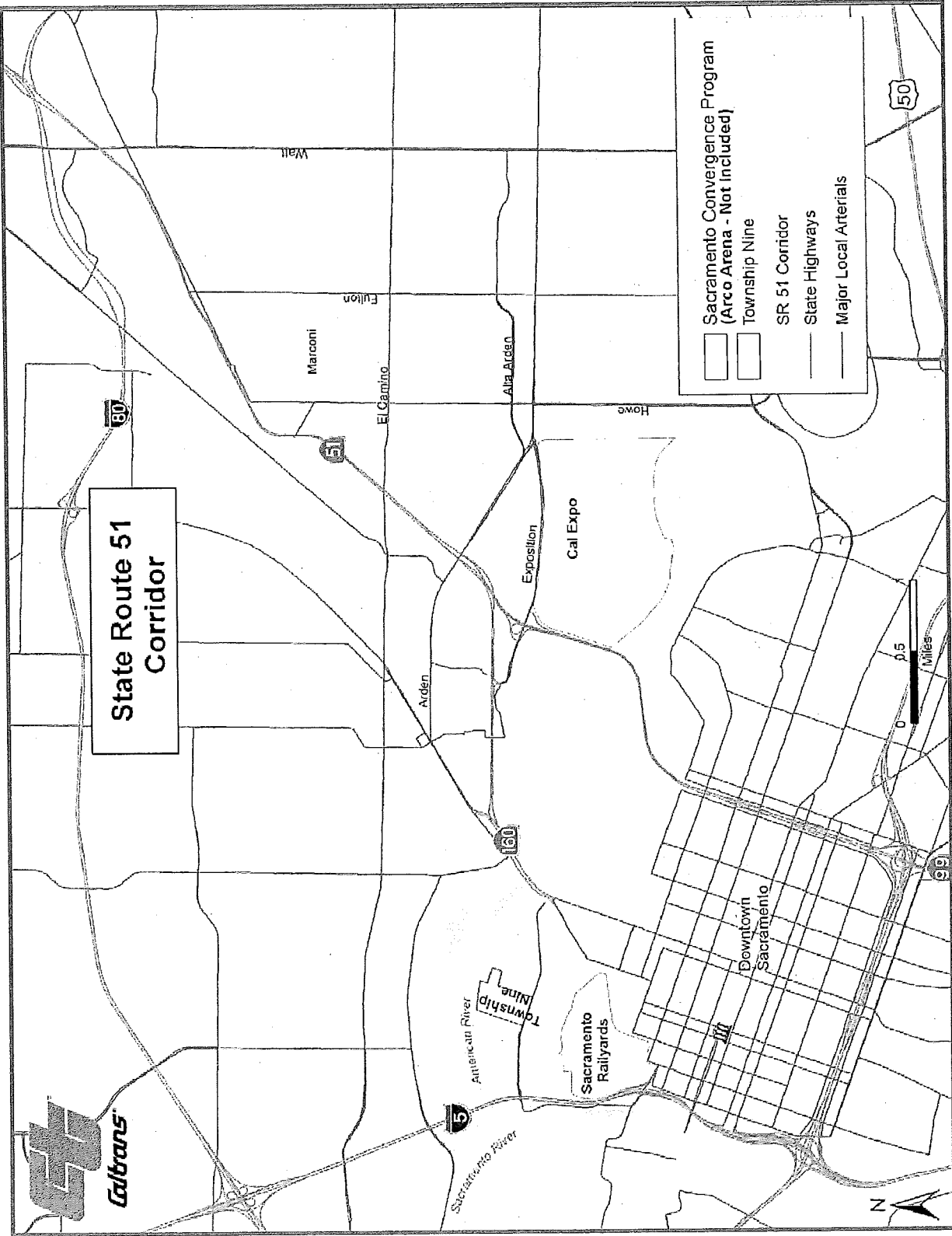
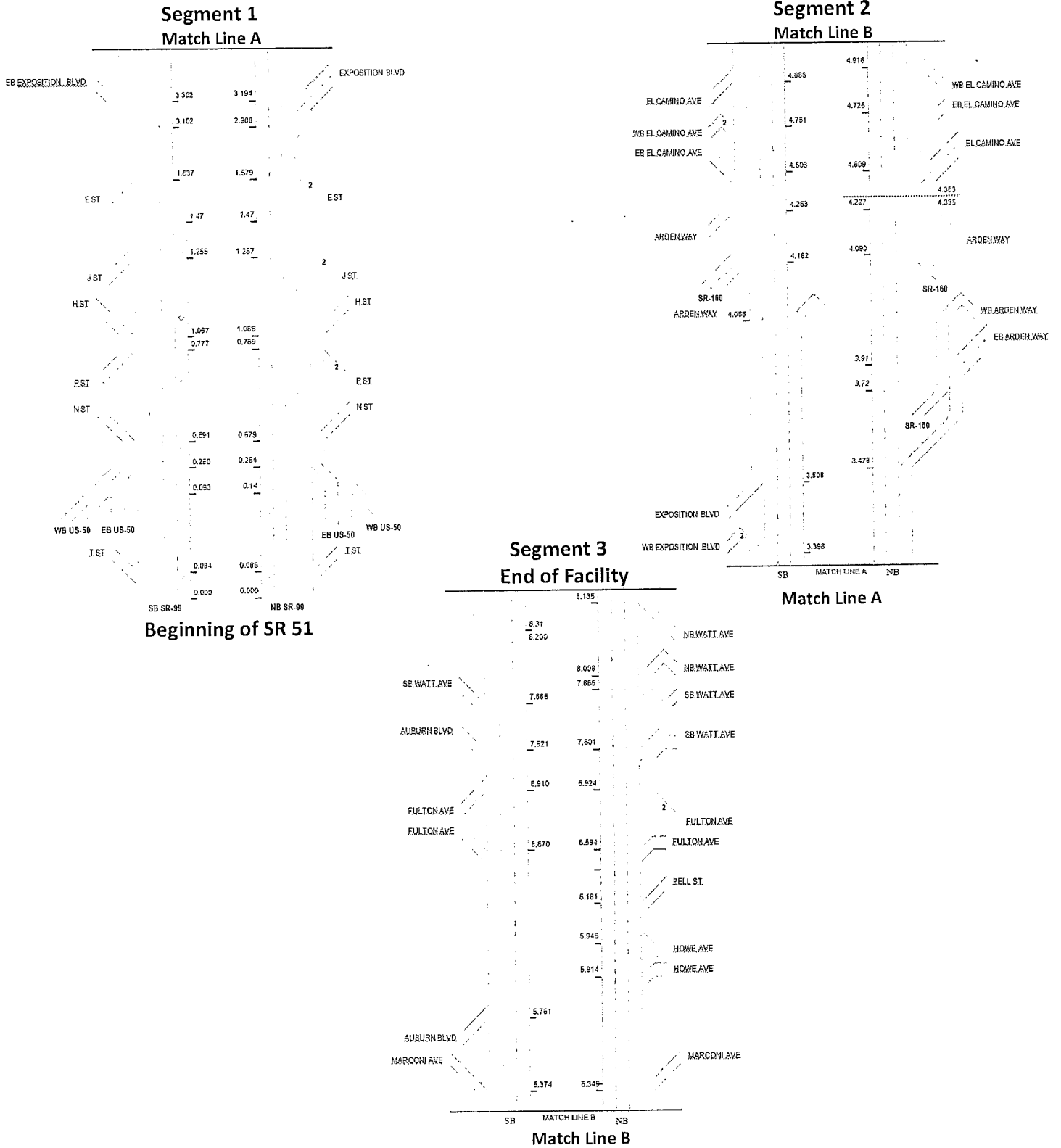


Figure 3: SR 51 Lane Configuration Diagram



EXISTING AND FUTURE CONDITIONS

EXISTING CONDITONS

The PI used existing data supplied in the 2009 *I-80/SR 51 Corridor System Management Plan*, the 2011 *I-80/SR 51 State of the Corridor Report*, and the 2012 *SR 51 Preliminary Investigation Modeling Report*. It should be noted that some of the existing facility performance data is several years old. However, the current economic recession has resulted in stagnant growth and traffic volumes have remained relatively flat. Therefore, the performance data is still valid. These Plans and Reports show that SR 51 is currently operating with low free flow speeds, stop-and-go traffic, bottlenecks, and significant vehicle hours of delay. There were approximately 855,000 annual vehicle hours of delay in 2009 for both directions on the corridor. The cost of these vehicle hours of delay are calculated by factoring lost time, fuel consumed, and wear and tear on the vehicle. Vehicle hour of delay cost equals \$17.35 based on the vehicle mix of trucks and cars, the price of fuel, value of time and wages, and vehicle repairs. In sum, annual vehicle hours of delay on SR 51 cost \$14.8 million in 2009, as shown in Table 1.

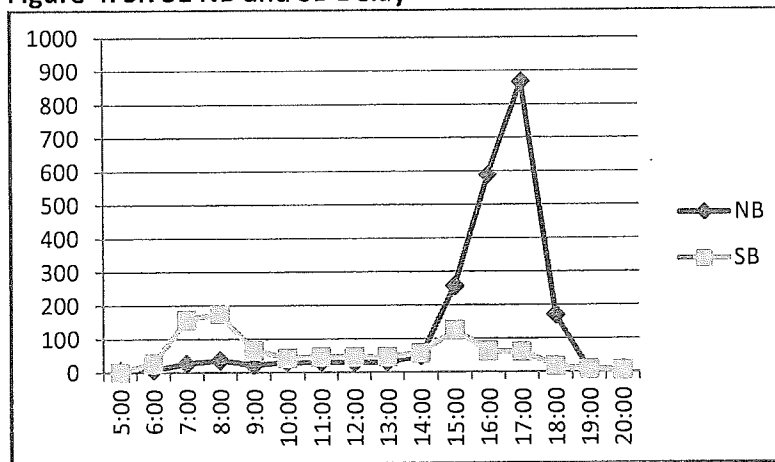
Table 1: Existing Facility Conditions

Segment	Post Miles	Location Description	Existing LOS	Existing Facility	Total Annual Vehicle Hours of Delay (60 mph) SR 51 NB, 2009	Total Annual Vehicle Hours of Delay (60 mph) SR 51 SB, 2009	Cost of Delay per Hour	Total Annual Cost of Delay, NB and SB, 2009
1	0.0/4.4	US 50/SR 99/ SR 51 IC to Arden Way	F	6F + 2 HOV to N St + 2 Aux to J St., 6F to Arden Way	437,000	171,000	\$17.35	\$10,548,800
2	4.4/8.9	Arden Way to I-80	F	6F + 2 Aux to Marconi Av., 6F to I-80	150,000	97,000	\$17.35	\$4,285,450

The more recent *MPR* identified an increase in annual vehicle hours of delay for both directions in 2011 to approximately 959,693. This equates to an even greater annual cost of \$16.7 million.

Southbound (SB) daily delay increases steadily throughout the week with the lowest delays occurring on Monday and the highest delays on Fridays. Northbound (NB) daily delay remains fairly constant throughout the week. The NB direction of SR 51 experiences minor delay in the morning peak period and major delay in the afternoon, peaking between 3:15 and 6:15 p.m. As shown on Figure 4, the SB direction experiences peaking between 6:00 and 9:00 A.M. and 3:00 and 6:00 P.M..

Figure 4: SR 51 NB and SB Delay



Vehicle Hours of Delay under 65 MPH by Time of Day, April 1-14, 2008

BOTTLENECK ANALYSIS

The *2000 Highway Capacity Manual* defines a bottleneck as “a road element on which demand exceeds capacity.” Bottleneck locations and causality were identified for SR 51 as part of the development of the *I-80/SR 51 CSMP*. Bottleneck locations identified in the CSMP were determined using a combination of Caltrans Performance Measurement System (PeMS) data, the Highway Congestion Monitoring Program (HICOMP) report, probe vehicle tachometer (“tach”) runs, and field observations. Causalities for these major bottlenecks range from high traffic demand (congestion), heavy weaving/merging areas, or physical constraints such as lane drops, incomplete Bus/Carpool lane network, and incomplete Auxiliary/Transition Lane network. Minor or hidden bottlenecks are less pronounced but may result in a major bottleneck if another major bottleneck is removed or not activated. These minor bottlenecks include the termination of auxiliary lanes. The report compared the tach run data, field observations, and the number of days a particular bottleneck occurs to determine the severity of the bottlenecks. Table 2 shows a summary of the SR 51 bottlenecks.

Table 2: SR 51 Bottlenecks

Location	Post Miles	PeMS Speed Contours		Caltrans Probe Vehicle Runs		Cause
		AM	PM	AM	PM	
Northbound						
E St.	2	Minor	Major		Major	The upstream lane drop combined with the increase in traffic from E St and the short merge at the E St. on-ramp.
Exposition Bl.	2.5	Minor	Minor		Minor	Exiting vehicles at Exposition Bl., as well as the lane drop at the Arden off-ramp.
El Camino Av.	4.5	Minor	Major			The increase in traffic demand from El Camino Av. causes the bottleneck at El Camino Av.. Also, the lane drop and horizontal curve at the Marconi Bridge cause a reduction in capacity, resulting in a bottleneck and a queue that extends back to El Camino, and sometimes to the SR 51/SR 160 merge point.
Marconi Av.	5.5	Minor	Minor			The termination of the auxiliary lane at Marconi Av. and a horizontal curve on SR 51 just past the Marconi Av. interchange.
Watt Av.	8				Major	Vehicles exiting and entering at Watt Ave create a merging and weaving
Southbound						
Watt Av.	7	Major		Major		The increase in traffic entering from Watt Ave and is perpetuated by the upstream lane drop and heavy volumes from I-80.
El Camino Av.	4.5	Major		Major		Weaving vehicles headed to Arden or SR 160, along with vehicles entering from El Camino and the lane drop at SR 160.
Exposition Bl.	3		Major		Major	The increase in traffic entering from Exposition Bl., the heavy volume exiting at Exposition, heavy demand from Arden, and the downstream lane drop.
E St.	2	Minor			Minor	The narrowing of the freeway right-of-way as it crosses under the railway and service bridges while rounding a corner.

The more recent *2011 MPR* and 2012 PeMs data identified an additional SB AM bottleneck at Auburn Bl. (PM 7.6), NB and SB PM bottlenecks between E St. and the American River Bridge, and NB and SB PM bottlenecks by T St. (PM 0.1).

FUTURE CONDITIONS

Overall traffic has increased and will continue to increase due to development within the corridor. Table 3 depicts the current and forecasted data for the facility as identified in the *I-80/SR 51 CSMP*. Traffic volumes are forecasted to increase 40 percent (%) in the twenty years from 2007 to 2027 for both the peak hour traffic and the average annual daily traffic. While the actual volume increases between 2007 and 2027 will likely be smaller due to the downturn of the economy, there will still be significant increased demand. Along with this, the volume over capacity (V/C) ratio will significantly increase from 1.02 to 1.29 on Segment 1 and from 1.08 to 1.54 on Segment 2. With such large increases, it is imperative to provide improvements that will ensure the continued functionality and operating efficiency of SR 51.

Table 3: Current and Future Travel Conditions

County	Location	Current Traffic Data—2007					Future Traffic Data — 2027 ⁴			
		% of Trucks	Peak Directional Split ¹	Peak Hour Traffic	Average Annual Daily Traffic ²	Volume over Capacity ³	Peak Hour Traffic (Build)	Average Annual Daily Traffic (Build) ²	Volume over Capacity (No-Build) ³	Volume over Capacity (Build) ³
SAC	Segment 1: US 50/SR 99 to Arden Way/SR 51/ 160 IC	4%	59%	13,000	166,000	1.02	18,200	232,400	1.29	1.29
	Segment 2: Arden Way/ SR 51/ 160 IC to I 80	4%	59%	11,800	151,000	1.08	16,520	211,400	1.54	1.54

¹ Peak Directional Split: The percentage of total traffic in the heaviest traveled direction during the peak hour.

² Average Annual Daily Traffic (AADT): The average number of vehicles per day in both directions.

³ Volume over Capacity (V/C): The volume of traffic compared to the capacity of the roadway.

⁴ Data derived from SACMET Travel Demand model

PROJECT IMPROVEMENTS AND PRIORITIZATION PROCESS

A prioritized list of candidate improvement projects was developed based on the following process:

A SR 51 PI Project Development Team (PDT) composed of representatives from Caltrans’ Planning, Right-of-Way, Environmental, and Traffic Operations, as well as the City of Sacramento, Sacramento Regional Transit District (SacRT), and the Sacramento Area Council of Governments (SACOG) participated in a series of meetings where they identified the scope, desired outcomes, resource needs, and a candidate list of improvements to SR 51. The improvements included traffic operations system (TOS) elements, auxiliary/transition lanes, Bus/Carpool lanes, and widening of structures, and are depicted in Figure 5.

Once the candidate improvement projects were identified, they were analyzed to identify their incremental contribution toward corridor mobility and prioritized based on the results of the individual and aggregated analyses. Transportation modeling applications, including micro simulation analysis, were used to quantify the benefits and determine the prioritization of the auxiliary/transition lanes and Bus/Carpool lane projects. Ramp metering and Intelligent Transportation System projects were not included in the micro simulation analysis, but are the highest priority based on their relatively low cost and high benefits.

The micro simulation modeling determined the traffic impacts and measures of effectiveness of specific/packaged projects on the SR 51 mainline and interchanges. The modeling incorporated PeMS count data, manual counts, origin/destination data, and projected growth from the SACMET travel demand model.

The modeling was conducted in two separate studies. The first focused on alternatives associated with adding a transition lane in the NB direction from E St. to the American River (Am. River) Bridge. The second examined the benefits of adding auxiliary/transition lanes compared to adding Bus/Carpool lanes on all of SR 51. The E St. NB transition lane project was separated from the second modeling study because it involved the possible closure of the E St. on-ramp and, therefore, would require unique considerations.

The final list of prioritized projects is indicated in Table 4.

Figure 5: SR 51 PI Improvement Projects

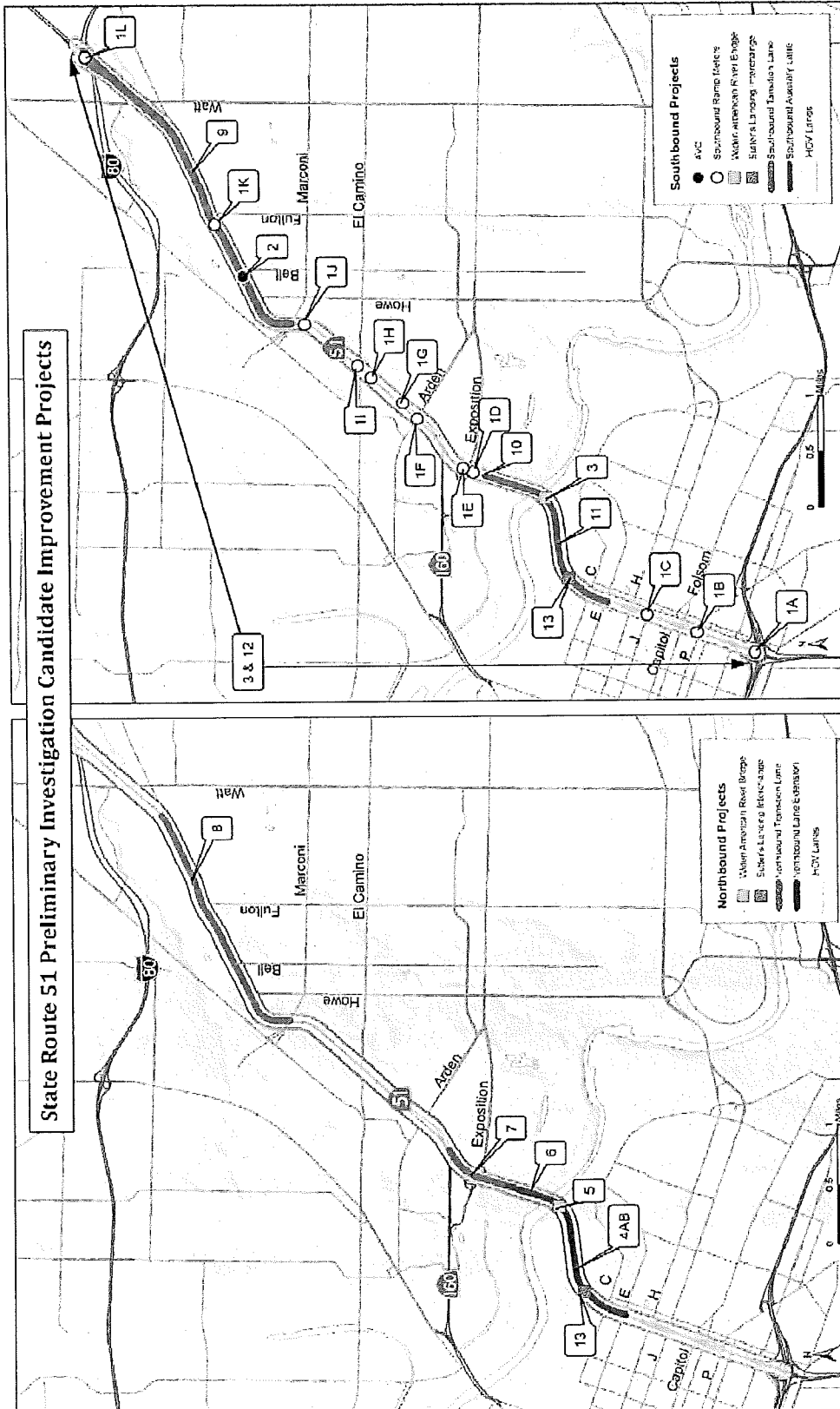


Table 4: SR 51 PI Prioritized Projects

Project #	Post Mile	Location	Description	
Ramp Metering Projects²				
1	A	0.1 T St.	Add Ramp Meter, southbound (SB)	
	B	0.6 N St.	Add Ramp Meter, SB	
	C	1.1 H St.	Add Ramp Meter, SB	
	D	3.3 Exposition Bl.	Add Ramp Meter, northbound (NB)	
	E	3.4 Exposition Bl.	Add Ramp Meter, SB	
	F	4.1 Arden Way	Add Ramp Meter, SB	
	G	4.2 Arden Way	Add Ramp Meter, NB	
	H	4.6 El Camino Av.	Add Ramp Meter, NB	
	I	4.8 El Camino Av.	Add Ramp Meter, SB	
	J	5.4 Marconi Av.	Add Ramp Meter, SB	
	K	6.7 Fulton Av.	Add Ramp Meter, SB	
	L	8.6 SR 244	Add Ramp Meter, SB	
	Intelligent Transportation System (ITS) Projects			
	2	6.22	Bell St.	Convert Traffic Monitoring Station to Automatic Vehicle Counter for improved vehicle classification data set.
3	0.0/8.8	US 50 to I-80	Install fiber-optic communication lines along corridor to connect all ITS elements, and improve communication and reliability add Blue Tooth reader for improved travel time measurement.	
E Street Transition Lane Project				
4A	1.4/2.6	E St to the Am. River Bridge	Add NB Transition Lane. This Project alternative assumes that the E St. On-Ramp will remain open. Additional Structural costs will become necessary to lengthen B St. and Elvas St. underpasses, and A St. overcrossing (OC).	
4B	1.4/2.6	E St to the Am. River Bridge	Add NB Transition Lane. This Project alternative assumes design exceptions for reduced lane width in certain locations a St. NB On-Ramp will close. No additional Structural and ROW costs will become necessary.	
American River Bridge Project³				
5	2.6	Am. River Bridge	Widen from 3- to 5-lanes in each direction for phased inclusion of Transition and Bus/Carpool lanes.	
Transition and Auxiliary Lane Projects⁴				
6	2.6/3.1	Am. River Bridge to Exposition Bl.	Add NB Transition lane.	
7	3.1/3.7	NB Exposition Bl. to SR 160	Add NB Transition lane. Widen NB SR 160 SEP to 4-lanes	
8	5.5/7.6	Marconi Av. to Watt Av.	Add NB Transition lane. Lengthen Marconi, Fulton & Watt Aves. OC. Reconstruct Howe & Bell Aves. Ramps. Lengthen SB or Auburn/Watt Av. ramp flyover ramp. Widen Arcade Creek Bridge to 4-lanes each direction.	
9	5.5/8.7	Watt Av. to Marconi Av.	Add SB Transition lane. Lengthen Marconi, Fulton & Watt Aves. OC. Lengthen SB on-ramp from Auburn/Watt Av. ramp flyover to Watt Av. ramp.	
10	3.0/3.2	Exposition Bl.	Add Auxiliary lane SB between ramps. Modify EB Exposition Bl. loop on-ramp.	
11	1.4/3.1	Exposition Bl. to E St.	Add SB Transition lane. Lengthen B St. underpass. Lengthen A St. OC. Extend Bus/Carpool lane. This Project Alternative completion of Project 2B. Structures work not required if Project 2A completed.	
Bus/Carpool Lane Projects⁵				
12	0.0/8.2	US 50 to I-80	Add Bus/Carpool lanes	
Other Projects				

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E STREET TRANSITION LANE MODELING

The purpose of modeling the E St. to Am. River Bridge transition lane as an individual project was to evaluate and compare the two alternatives for the project: adding the transition lane and closing the E St. on-ramp or adding the transition lane with the on-ramp open. The modeled scenarios were as follows:

- 2020 Future Base (No Build)
- 2020 Future Base + Transition lane with E St. on-ramp open
- 2020 Future Base + Transition lane with E St. on-ramp closed

The study area for this analysis was NB SR 51 from the P St. on-ramp to the end of the proposed transition lane, the beginning of the Am. River Bridge, a distance of 1.8 miles. The Study area also included the P St., J St., and E St. on-ramps. The PM peak period (3:00 P.M. – 7:00 P.M.) was chosen as the analysis time period because the PM has much higher congestion in the study area than the AM peak period.

The models were developed using Paramics micro simulation software and produced several measures of effectiveness, including traffic volumes, average speeds, travel times, and delays. Figure 6 compares the total vehicle hours of delay (all vehicles) per day for each scenario. Figure 7 compares the vehicles hours of delay for each scenario based on facility type.

Figure 6: PM Total Delay Comparison

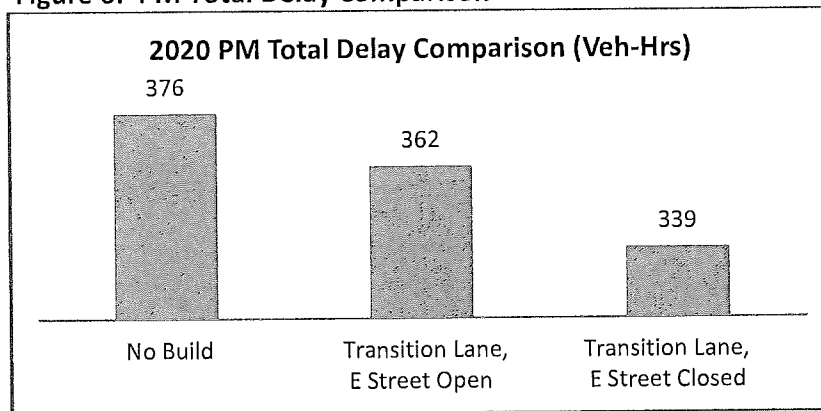
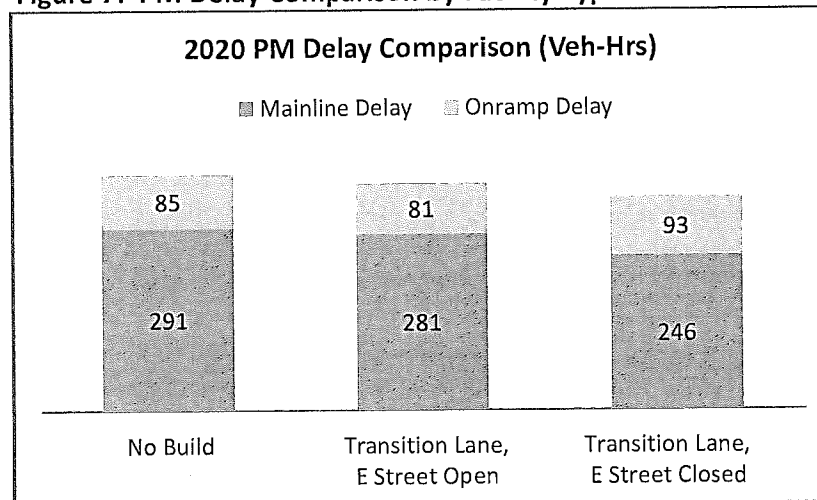


Figure 7: PM Delay Comparison by Facility Type

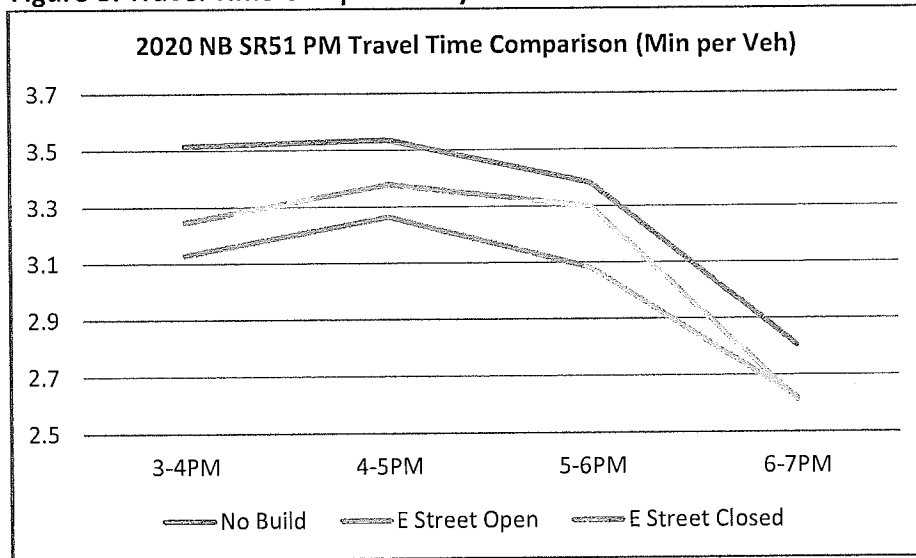


The addition of the transition lane reduced overall mainline delay for both scenarios. In comparison to the “No Build” scenario, the transition lane with the E St. on-ramp open reduced overall vehicle hours of delay by 4 percent (%). The transition lane eliminated the bottleneck upstream of the E St. on-ramp, which is caused by a lane drop from 4 to 3 lanes and merging from the J St. on-ramp. The project does create a new bottleneck at the Am. River Bridge where the transition lane ends, but the new bottleneck is not as intense as the existing bottleneck.

The transition lane with the E St. on-ramp closed reduces overall vehicle hours of delay by 10%. This scenario eliminates the same bottleneck as the E St. on-ramp open scenario plus removes the congestion caused by the merging from the E St. on-ramp. Vehicles flow with no congestion due to weaving or merging until the end of the transition lane. This scenario also creates a new bottleneck at the Am. River Bridge that is not as intense as the existing lane drop bottleneck. As expected, the elimination of the E St. onramp does increase the delay on the J St. on-ramp slightly; however because freeway access is reduced, the mainline delay reduction is more substantial than with E St. on-ramp open. Our initial modeling also indicates we would be able to meter traffic onto the freeway at a rate which prevents any queuing to the local street system and still maintain substantive mainline freeway benefits which exceed those with the E St. off-ramp remaining open.

Figure 8 compares the PM peak period travel times for all three alternatives on NB SR 51. The transition lane with the E Street on ramp closed decreases the travel time per vehicle more than the other two scenarios especially during the 5:00 P.M. – 6:00 P.M. peak hour. The peak hour travel time reduced by 3% with E St. open, which is less than the 9% reduction with E St. closed. Adding the transition lane and closing E St. provides more congestion relief and costs much less than leaving E St. open.

Figure 8: Travel Time Comparison by Scenario



BUS/CARPOOL LANE-TRANSITION LANE COMPARISON MODELING

This modeling study focused on the SR 51 corridor as a whole and the cumulative traffic impacts of the proposed projects. The I-80/SR 51 CSMP micro simulation models included base year, future year, and project specific future year scenarios and modeled the entire SR 51 corridor as well as its connections to I-80, SR 99, and US 50. The CSMP modeling effort had two additional future scenarios available for the I-80/SR 51 corridor, which were used to derive the performance measures in this report. Table 5 shows the proposed projects that were modeled.

Table 5: Projects Modeled

Project #	Post Miles	Location	Project Description
4A	1.4/2.6	E St. to the American River Bridge	Add NB Transition Lane with E Street on-ramp open.
4B	1.4/2.6	E St. to the American River Bridge	Add NB Transition Lane with E Street on-ramp closed.
5	2.6	American River Bridge	Widen to 4-lanes in each direction
6	2.6/3.1	American River Bridge to Exposition Bl.	Add NB transition lane.
7	3.1/3.7	NB Exposition Bl. to SR 160	Add NB transition lane and widen NB SR 160 SEP to 4-lanes.
8	5.5/7.6	Marconi Av. to Watt Av.	Add NB transition lane. Lengthen Marconi, Fulton & Watt Avs. OC. Reconstruct Howe & Bell Avs. Ramps. Lengthen SB on-ramp from Auburn Bl./Watt Av. ramp flyover ramp. Widen Arcade Creek Bridge to 4-lanes each direction
9	5.5/8.7	Watt Av. to Marconi Av.	Add SB transition lane. Lengthen Marconi, Fulton & Watt Avs. OC. Lengthen SB on-ramp from Auburn Bl./Watt Av. ramp flyover ramp
10	3.0/3.2	Exposition Bl.	Add auxiliary (aux) lane SB between ramps. Modify EB Exposition Bl. loop on-ramp.
11	1.4/3.1	Exposition Bl. to E St.	Add SB transition lane and lengthen B St underpass. Lengthen A St. overcrossing. Extend Bus/Carpool lane.
12	0.0/8.9	US 50 to I 80	Add Bus/Carpool lanes.

The study combined the proposed projects into the scenarios described below because only two future scenarios were available:

- 2020 Future Base plus key CSMP projects (No Build)
- 2020 No Build plus projects 4-11 (All Aux/Transition lanes)
- 2020 No Build plus project 12 (Bus/Carpool Lane)

The study area for this analysis was the entire SR 51 corridor (NB and SB) as well as all of the on and off ramps. The AM and PM peak period (6:00 – 10:00 A.M. and 3:00 – 7:00 P.M.) were used as the analysis time period. The models were developed using Paramics micro simulation software and produced several measures of effectiveness, including traffic volumes, average speeds, travel times, and delays. Figures 9 through 12 compare the mainline vehicle hours of delay for all three modeled alternatives for each peak period. On- and off-ramp delay stayed consistent for all three scenarios.

Figure 9: 2020 AM Delay - NB/SB

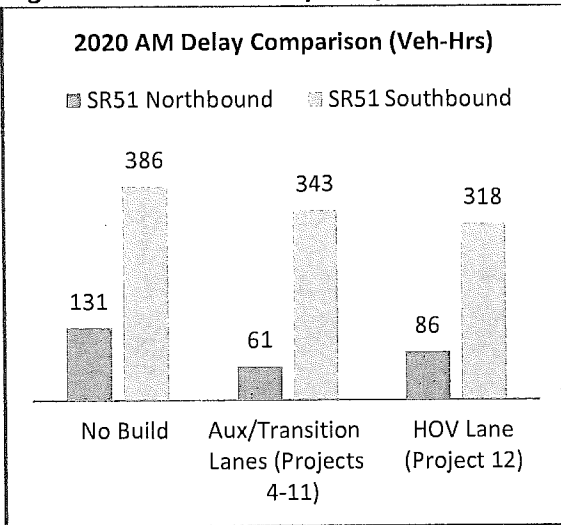


Figure 10: 2020 AM Delay - Combined

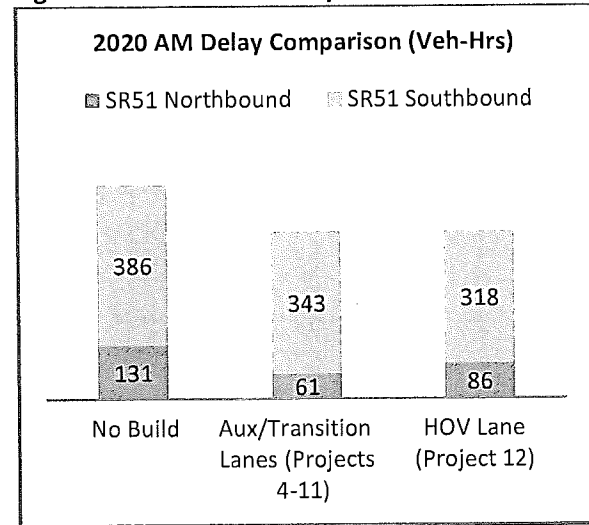


Figure 11: 2020 PM Delay – NB/SB

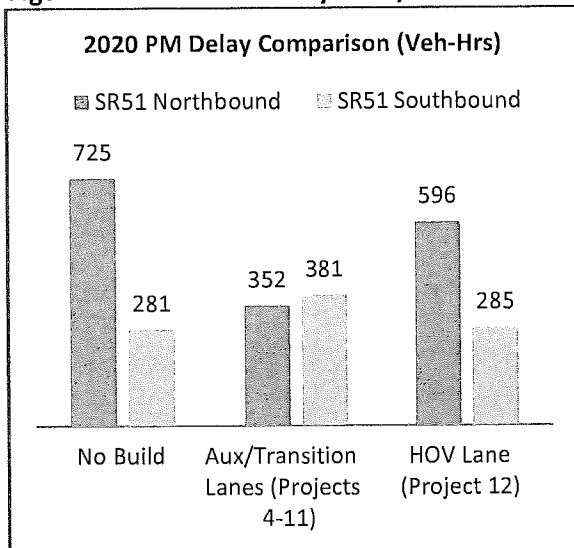
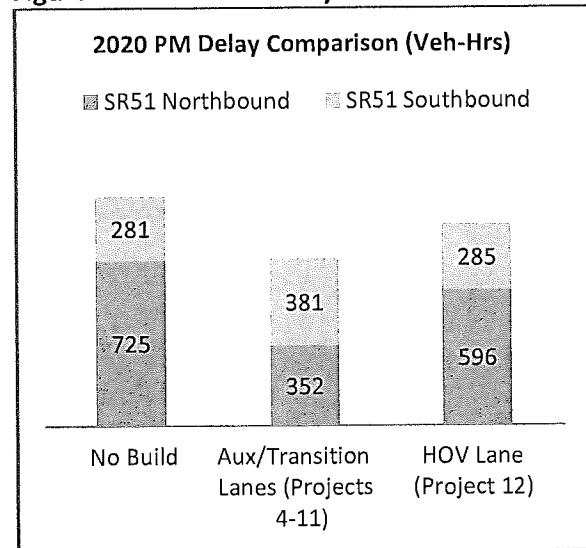


Figure 12: 2020 PM Delay - Combined



Overall delay was reduced significantly in most scenarios. For example, the NB PM delay reduced by 52% with the Aux/Transition lanes alternative and 18% with the Bus/Carpool lane alternative. SR 51 NB AM also saw major delay savings of 54% and 34% with the Aux/Transition lanes and Bus/Carpool lane alternative.

Delay in the SB AM on SR 51 decreased by 11% with the Aux/Transition lanes and 18% with the Bus/Carpool lane added to the network. Unexpectedly, the PM delay in the SB direction increased by 36% with the Aux/Transition

lanes alternative and 2% with the Bus/Carpool lane alternative. The increase in delay for SB SR 51 was due to additional congestion caused by weaving and merging between Marconi Av. and SR 160. Even though there was no specific mainline improvement, vehicles in the model approached this section from an additional lane and changed the lane distribution of vehicles. This created additional lane changes and weaving through the section. In addition to this preliminary analysis, further analysis is needed to determine the causality of the congestion and identify any potential improvements that would alleviate the potential congestion on this section of SR 51.

During the PM Peak Period, overall delay for both directions was reduced by 27% Aux/Transition lanes alternative and 12% in the Bus/Carpool lane alternative. During the AM Peak Period, overall delay for both directions was reduced by 22% in both alternatives. Figures 13 and 14 compare the PM travel times for all three alternatives on NB and SB SR 51.

Figure 13: 2020 Northbound PM Travel Time Comparison

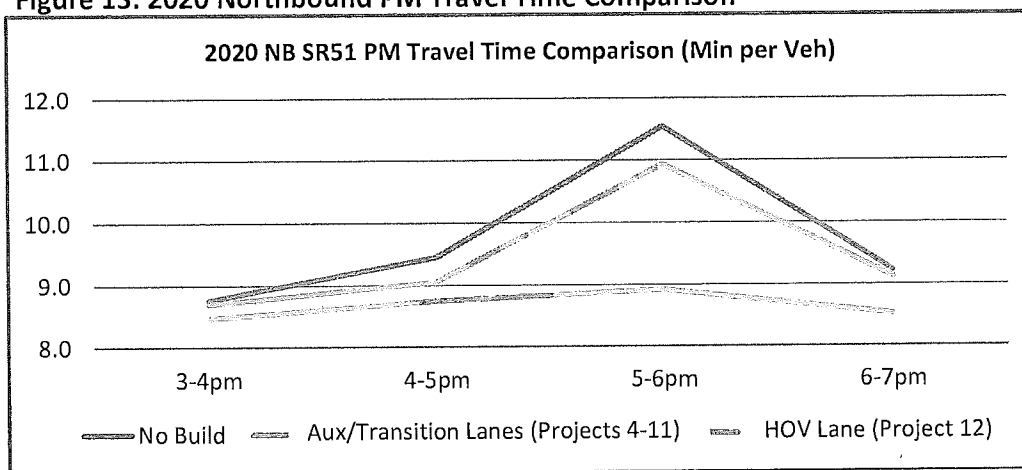
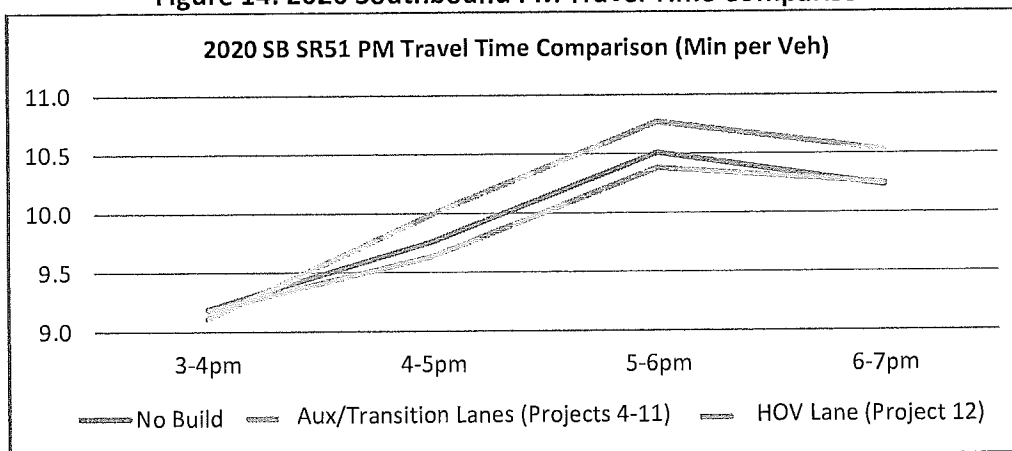


Figure 14: 2020 Southbound PM Travel Time Comparison



The NB PM peak hour travel time improved by 23% with the Aux/Transition lanes alternative and over 5% with the Bus/Carpool lane alternative. Because of the additional weaving and merging, the SB travel times increased by 2.5% with the Aux/Transition lanes alternative and decreased by 1% with the Bus/Carpool lane alternative. The AM scenarios saw travel time improvements in both SB and NB directions.

Both the Aux/Transition Lanes and Bus/Carpool Lane project scenarios provide significant congestion relief. However, since the Aux/transition lane alternatives are substantially lower in cost, they are prioritized higher than the Bus/Carpool lanes. Combining both the Aux/Transition lanes and the Bus/Carpool lanes offer significant cost-efficiencies, though, because widening the American River Bridge is assumed to only occur with the Aux/Transition Lanes and Bus/Carpool Lane combined project scenario.

CORRIDOR CHALLENGES

Improvements to SR 51 face a number of significant challenges associated with its constrained location and high traffic volumes. The lack of multiple American River crossings in the Sacramento urban core and limited parallel roadway capacity contribute toward high travel demand on SR 51. SR 51, along with I-5, SR 160, Jibboom St., J St., Watt Av., and Howe Av., is one of only a few vehicle crossings of the American River in the City of Sacramento. In addition, because the corridor passes through downtown Sacramento, there are several challenges to implement improvements, such as land use, financial, limited right-of-way (ROW), environmental and geometric constraints, and high construction costs.

LAND USE

There are several challenges along this corridor that stem from land use and environmental issues. In terms of land use, SR 51 traverses the eastern boundary of downtown Sacramento with its high and medium density residential, commercial, and industrial uses. There are also large trip generators along the corridor, namely retail shopping in Arden, the State Fair site at Cal Expo, and more commercial, retail, and housing to its connection with I-80, which provides interstate travel opportunities. Land use adjacent to SR 51 is built out with the exception of the State-owned Cal Expo property and 48 acres of property located near Sutter's Landing Park on the southeast side of SR 51. Numerous development proposals for this Sutter's Landing property have been submitted to the City of Sacramento over the years ranging from a 397 dwelling units project to a mixed-use project with 1.0 million square feet (sq. ft.) of office space, over 400,000 sq. ft. of retail/restaurant space, a 350 room hotel, and 900 dwelling units. The most current proposal includes solar panels to be constructed on the site. Several proposals have been made for the Cal Expo property, such as an arena for the local professional basketball team. Such a large trip generator would pose several challenges for the corridor. Any large proposal would create another large trip generator.

FINANCIAL AND ROW

It is anticipated that several funding sources will be needed to support the needed improvements to SR51, including Congestion Mitigation and Air Quality Improvement (CMAQ), Regional Surface Transportation Program (RSTP), developer fees, and other local and regional transportation dollars. Funding these projects will most likely require phasing or incremental improvements to the facility due to funding limitations.

In part, these financial constraints stem from the ROW challenges on the corridor. The facility is surrounded almost in its entirety by developed private lands with high land values. The high land costs and potential disruption in those communities would pose several challenges to any facility expansion project.

A creative solution to the financial and ROW problems for one of the key projects has already been proposed. This is the proposed E St. on-ramp closure. At this location, there is not sufficient ROW for an auxiliary/transition lane, and purchasing new ROW would be prohibitively expensive. Further, widening would require the expansion and reconstruction of the A St., B St., and Elvas St. crossing, which would be very costly. Instead, this PI has analyzed

the closure of the E St. on-ramp. The ROW from the acceleration lane would be used for the auxiliary/transition lane. It would not require the reconstruction of the crossings, thus saving significant funds. This, however, would require design exceptions for 11 foot wide lanes under the structures. Also, this would impact two SacRT bus routes that use this on-ramp. This closure would require SacRT to re-route busses to the J St. on-ramp. Caltrans will continue to explore this option with the City of Sacramento and SacRT.

NEXT STEPS

The projects identified in the SR 51 PI will take many years to implement and will require several different funding sources to bring to fruition. Caltrans will continue to work with its local and regional partners to plan, program, and construct individual projects and segments as upcoming transportation funding opportunities become available.

In addition, Caltrans will continue to remain engaged with the City of Sacramento as developments are proposed which may impact SR 51. This will allow Caltrans, the City, and the applicant developer to review, analyze, and coordinate the mitigation of direct and cumulative significant impacts to SR51 relating to the specific land use proposal and, as appropriate and indicated by an objective nexus study, provide for developer contributions for the needed improvements to SR 51. It is hoped that this PI can be used to streamline that process.

Prior to programming and constructing the proposed improvement projects, a Project Initiation Document (PID) must be prepared for each project or group of projects to identify the purpose and need, scope, cost, and schedule. As an initial step, Caltrans will begin to include the highest priority projects into the Three-Year PID Work Plan. This allows resources to be allocated for PID development and to compete for funding. Projects identified in this SR 51 PI that are included in the Fiscal Year 2012/13 Non SHOPP Three-Year PID Work Program include many of the Ramp Metering Projects (Project 1), the E St. to the Am. River Bridge NB Transition Lane Project (Project 4A/4B), the Am. River Bridge Widening Project (Projects 5), the Am. River Bridge to Exposition Bl. NB Transition Lane Project (Project 6), the Exposition Bl. to SR 160 NB Transition Lane and widening the NB SR 160 Separator Project (Project 7), and the Marconi Av. to Watt Av. NB Transition Lane Project (Project 8). Caltrans will add the remaining SR 51 projects in future PID Work Programs. The planned completion dates of the aforementioned PIDs range from June 30, 2013 to June 30, 2016, though contingent on available PID resources.

It is likely that Caltrans will propose funding for the first phase project development (Project Approval and Environmental Document – “PAED”) for the northbound extension of the transition lane from E Street to the American River Bridge through the next SACOG programming cycle in 2013. During this process, a substantive public and stakeholder outreach dialogue would occur regarding the project and, specifically, the alternative which includes closing the E St. on-ramp. Also, more detailed micro simulation modeling would be performed to assess the impacts to the J St. interchange and the surrounding local street network. Consideration should also be given to an innovative project funding strategy which would allow for the programming of full project funding during the upcoming SACOG programming cycle to ensure the timely completion of final project design and construction immediately following the PAED phase based on the selected alternative.

January 9, 2013

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
300 Richards Blvd, 3rd Floor
Sacramento, CA 95811

DEIR for McKinley Village, Project P08-086

Dear Ms. Allen:

I have lived 5 different residences in East Sacramento since 1975 or for 39 years. My children attended elementary, junior high and high school in East Sacramento so I am well versed about the school district and the neighborhood. I have served as a volunteer in my community including 3 years as a board member, vice-president and president of MENA. I have worked as a part-time real estate investor having invested in well-located California income property since 1970. All the properties I invested in have been located near downtown areas and have been in walkable neighborhoods close to city centers. I have very limited vacancies and a high demand for my rental units. My career has been to help people as a career counselor and as a manager in a non-profit.

This Process and the Lack of Fairness to the Citizens

It has been quite disturbing for me to witness this DEIR process for McKinley Village. The collective sentiment of the majority of the residents I talk to is resentment and annoyance regarding the way that the city does business. The city does not even provide hard copies of this EIR document so people are forced try to "read it" online which is ridiculous because it is really not possible to review a document this length online. It also eliminates my neighbors even seeing the document who are older and have no computers. The timeline the city gives to review this over major holidays was also dreadful and caused stress for people trying to live and pay taxes to the very city that has punished us with this process. This report is extremely biased. These houses should not be built in an area that is basically unlivable with vibrations from 35 to 50 trains a day to the pollution from thousands of cars. The City Council is responsible for people's health and their lives. It is irresponsible to look the other way when considering health risks for residents.

The consultant that was hired to prepare this DEIR has made it clear to the reader that they are "pro project" as the text reveals this bias repeatedly. This was very disturbing and it angers neighbors in East Sacramento.

C Street between 30th and 33rd Street

As you probably already know, C Street between 30th and 33rd Street is once again mentioned in the MV DEIR as a Major Collector because the city made a mistake in the General Plan document.

The section of C Street between 30th and 33rd Street is not a Major Collector. It is a local street. This was pointed out to Steve Cohn when we worked with MENA and ESP before on a former rendition of "McKinley Village" so Steve knows about it.

If the City keeps categorizing this section of C Street (in error) as a Major Collector then it is quite obvious that the DEIR for McKinley Village is inadequate. It is irresponsible NOT to correct this error!

Schools

There are 2 portable classrooms that are ancient located at Theodore Judah School and the school is crowded. There is not room at Theodore Judah for 130+ students. Sutter Middle School is also crowded and does not have room for these additional students.

Neighborhood Associations and "so called outreach" by the Developer

I am a member of all the neighborhood associations. The discussions with the developer should include discussions with the members about the project. The only neighborhood association that did consistent outreach to their members was East Sac Preservation.

Neither MENA under the current leadership or ESIA did outreach to their members and asked them what they think. A neighborhood association that operates in a bubble and does not engage the members is not a neighborhood association but instead is a private club. MENA has By-Laws to follow but under the current leadership they do not follow the By-Laws or have an adequate number of board members. (They have only 4 board members and no women on their board.) ESIA does not communicate with their members nor asks them for input about the project nor anything else. Their board members appear "permanent" as they have never sent out a request for board members to join them or apply to join them. They have the same board members year after year after year. They appear to also be a private club like MENA. Their speaking with the developer is a joke as with no discussions with their members, as then their "opinions" are in a bubble and are only influenced by their board members and no one else. This is completely unacceptable and the city should take this in consideration when "listening" to these neighborhood associations.

Since I was a board member of MENA for many years in the past, I worked with this developer about his project. When he met with the neighbors it was never to get their feedback and incorporate the feedback into changes on his project. This developer only communicates one way and it is him talking and everything should be listening. He has no ability to sit down with neighbors and resolve differences as his inability to ask questions and listen to feedback simply does not exist. On the other hand, I worked with closely as the MENA Vice President with the developers of the now closing Sutter Hospital. They invited us for coffee and listened to our feedback even taking notes about our neighborhood and they took to heart our suggestions. They incorporated these suggestions and they are now going build homes on that site and there is not public outcry or disagreement. And, that is because Teichert did their homework and they knew to listen carefully to the neighbors. Mr. Angelides fails at this completely. He has no idea how to work with people/neighbors of this project. He is not a person who sincerely wants to listen and incorporate changes into his project.

DEIR mitigation measures

Please differentiate between required and recommended mitigation measures. The cloudiness of this makes things very difficult for citizens.

Not a Sustainable Design

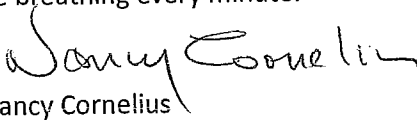
The DEIR should explain in detail and quantify how the proposed project will meet developer's stated objectives. This project is not consistent with sustainable design. The houses have many garage units and the residents rely on the automobile to get around. This is not a sustainable community. There is no transit. Bus line 34 is going to be discontinued soon so there will be NO bus line for these residents. *This project does not fit the city of Sacramento criteria for infill.*

Cumulative Impacts on this neighborhood

The city would have to look at all other development projects to really be clear about cumulative impacts. The other projects include Mercy Hospital, Sutter Park project, Sutter General Hospital etc.

A Future Slum

Lastly, I would have to mention that it is likely that this project will provide a future slum for the City of Sacramento. It is not a good site for these expensive homes trying to pretend they are part of McKinley Park. They are not. The homes likely will not sell nor will they rent. They could end up vacant and a slum for all of us to deal with. I would not live there due to the noise and vibration and toxics from the freeway and the railroad. No one I know would buy there or rent there. The location is truly horrible. I am not the only investor who has thought about this location and what is likely to happen. It is a "pipe dream" for Mr. Angelides to pretend this is McKinley Park. It is not McKinley Park and the financial fallout and the likelihood of a slum is a reality that the city needs to face. My neighbors already call this development "Cancer Cove" as it is not a nice place to live and if you did live there you would probably die of disease due to the location or stress from the vibration from the trains and the toxic air you would be breathing every minute.



Nancy Cornelius

67 Primrose Way

Sacramento, CA 95819

916 284-7786

January 9, 2014

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

SUBJECT: McKinley Village DEIR Comments

Dear Ms. Allen:

In the 36 years that I have lived in McKinley Park, I have observed a number of proposals to develop the 48-acre parcel now under consideration for the McKinley Village Project (hereafter McVillage). For this discussion, I shall focus on the Draft Environmental Impact Report (P08-086) and traffic-related issues surrounding the McVillage proposal.

Traffic planning and management is the most crucial issue of the McVillage proposal, in terms of viability. No other single factor will have more day-to-day impact on prospective and current residents in the area. Very limited traffic access to the site has already come under intense scrutiny, and rightfully so. Unfortunately, the DEIR obscures and misrepresents data needed to address this and other traffic concerns.

The City was not transparent, and never provided me with specific details on how they remedied data flaws in traffic flow studies during the summer and fall. (See attached photos.) That data was questionable because traffic counting cameras were first placed on area streets when Theodore Judah School was closed for the summer. The school is a major source of traffic close to the McVillage site and 40th Street, proposed as a main connector from McKinley Boulevard.

On at least two occasions in October, when the City was doing major street work to install new water meters and water lines in the neighborhood closest to the McVillage site, traffic cameras were set up immediately adjacent to street closings. I observed and photographed cameras placed next to "street closed" signs. Traffic flow around the school and surrounding area was severely disrupted during this time.

It is very possible, if not probable, that traffic was under-counted, not to mention distortion of the usual traffic flow pattern. Why would the City allow monitoring at the very times when school traffic was absent and street traffic was being diverted and disrupted? I personally called this situation to your attention. You referred it to staff, but I never received any explanation from anyone with the City on why this happened, or how (or whether) the traffic data were actually adjusted or corrected.

I attempted to get an answer again at a MENA meeting on Oct. 16, 2013, when I approached Mr. Phil Angelides, who leads the McVillage project. When I asked about traffic monitoring flaws, he brushed off my concern. Mr. Angelides said the traffic

counts were acceptable in 2008 (when a previous project was proposed), and this project would generate even less traffic. He clearly believed the issue was a slam-dunk for McVillage. But was the previous monitoring flawed too? Were results from the latest monitoring – funded by the developer and “supervised” by the City – simply a foregone conclusion? Given the DEIR’s order-by-the-number menu for McVillage, these are legitimate questions.

Based on my experiences, I mistrust DEIR data regarding traffic flow. My mistrust is further underscored by the fact that the DEIR (1) blatantly underestimated the number of persons (and drivers) projected to live in McVillage, and (2) misrepresented the environmental and health effects from various transportation source emissions. These points have been addressed in detail by other DEIR commenters.

Another traffic-related concern is the DEIR’s “rolling stop” approach to gauging acceptable levels of traffic, while ignoring pedestrian safety issues. The DEIR puts car wait time at stop signs as its top priority. What about speeding? A number of connector streets between McKinley Boulevard and Elvas already have speeding traffic at all hours. I have personally witnessed drivers going 40-45 mph on streets where children are present. No wonder some residents have posted signs: “Drive as if your children lived here” and “Children at play.” Even at marked crosswalks, adults and children often find it difficult to cross the streets safely in this area. How would several thousand additional car trips daily affect safety? This is supposed to be a pedestrian-friendly area.

Finally, it is most important to take a long-term view of area traffic management and invest accordingly. Access problems for McVillage were created by short-sighted planning in the past, often based on cutting costs. We can’t move major freeways or rail lines today, but we can be realistic about the infrastructure needed to sustain and enhance this area well into the future. McVillage could be the answer, but it needs to be more than just a cleverly-named development, with more transportation access to the surrounding area.

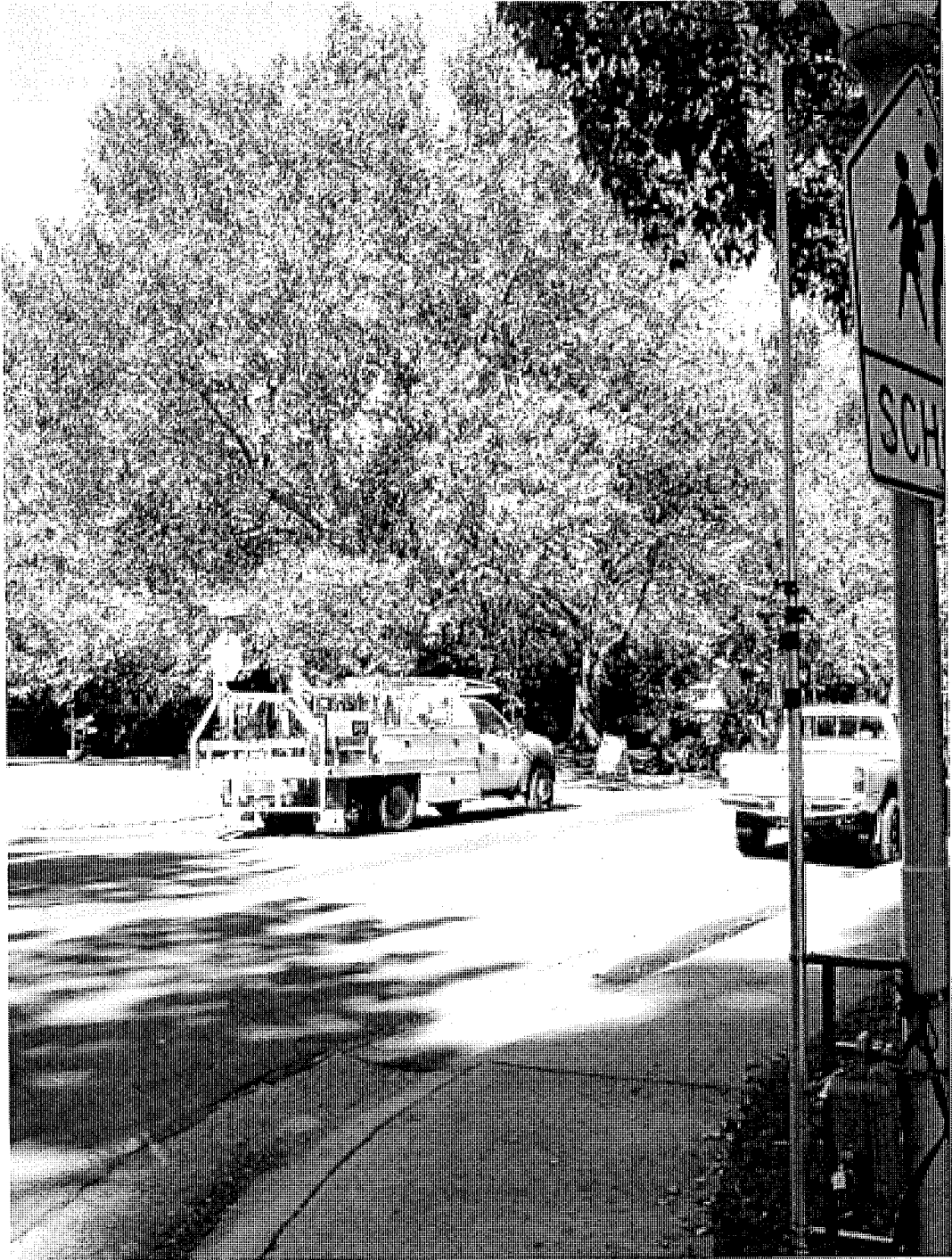
According to the DEIR, the developer rejects an Alhambra connector as too costly. Is that truly smart growth? The City should seriously consider a series of transportation requirements as a condition for project approval, including an Alhambra connector, a well-engineered center lane divider along Elvas, control measures for through streets near McVillage access points, and yes, public transit. In my view, without some serious concessions to future transportation needs, McVillage is not a viable project.

Thank you for accepting my comments.

Glenn Brank
290 San Antonio Way
Sacramento, CA

(photos on following pages)













09 JANUARY 2014

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, California 95811

Dear Ms Allen,

These comments are in regard to the **PUD Guidelines (Appendix M) for the McKinley Village Project (P08-086)**, dated 12 November 2013.

The PUD Guidelines for this project are consistently vague and so open-ended that it is difficult to make substantive comments on them. According to both the DEIR and these Guidelines, the overarching project goal is to create “an orderly and systematic development of an integrated, sustainable residential community that is consistent with the goals and policies of the City of Sacramento 2030 General Plan and the SACOG Blueprint Plan.” It is difficult to place any metrics on either “orderly” or “systematic” so there is no need to comment there. However, the project, as we pointed out in our DEIR comments, is deficient in meeting many goals and policies of the 2030 GP and the SACOG Blueprint. It makes just token acknowledgement to the tenets of smart growth and the Blueprint other than its proximity to the urban core. It is not a Complete Neighborhood, has virtually no mixed-use characteristics, does not provide housing opportunities for a wide range of the City’s population, does not have any viable public transit and is an excessively auto-oriented, suburban-style sub-division development. It is very poorly connected to adjacent neighborhoods with just one vehicular connection to Midtown (which is an at-grade railroad crossing) and one to East Sacramento through a 150-foot long tunnel.

Furthermore, while the structures themselves may mimic some of the architectural qualities of the adjoining East Sacramento and McKinley Park neighborhoods, the lot sizes, lot types, the setbacks and the relation of the houses to the street is nothing like those neighborhoods. The “spatula” driveway cul-de-sacs for both the Courtyard and Cottage units do not appear in those neighborhoods. Half of these units (1/4 of the project’s units) will have 2-car garage doors as the primary element in the front, public façade.

The front yards for almost all of the houses will be so small (8’ deep or less) that there will be insufficient room for more than a few shrubs. In fact many of the yard areas are so tiny that planting and maintenance will be very problematic compared to East Sac yards. Guideline 2.4.2 calls for “front yard landscaping should consist of at least one deciduous tree a minimum of 15-gallons in size.” Is there sufficient space for large trees in these yards or is this planned for the sidewalk median?

Turf area, which is the most common front-yard for East Sac houses, should not be used in this project due to the tiny yard size, which will make for inefficient maintenance, and the ultra-high water demand turf requires.

Most if not all of the Residential Dimensional Standards (Table 2) deviate significantly from what is found in East Sac. Lot coverage of 70% is considerably more than East Sac properties where most properties have 25-foot front yard setbacks, not the 7 to 8 feet of this project. There are also lot coverage exceptions for garages and covered porches that redefine the lot coverage definitions for the rest of the City. It is an exception when two East Sac houses are just 6 feet from each other as is common in this project. Will those walls even be permitted to have windows in them to satisfy the Building Code? Rear setbacks of 3 to 5 feet are non-existent in East Sac.

Is the 2.2.4 Density variance of up to 20% per “village” going to change the character of those “villages” so much that they will be unrecognizable? Is this a common PUD guideline? It seems much too open-ended.

Many of the houses in East Sac neighborhoods, which the project wants to emulate, are not as complicated, cut-up and “interesting” as these guidelines and renderings seem to mandate. I encourage the designers to include some more restrained houses that are not over-articulated in their rooflines, materials, and façade treatments. (See the California Cottage, Craftsman, European Cottage and Colonial Representative Photos) This is particularly true when the rest of the house may be relatively simple because the elevation does not face a public or private street or park which makes for a two-dimensional house with all of the articulation on just one face. The Urban Farmhouse style seems inappropriate for this particular development in this location.

Another East Sac house characteristic that this project is ignoring is that nearly all of our historical houses have raised-floor construction. I encourage the homebuilders to consider that traditional style of construction for at least some of the development.

Stucco, while ubiquitous in California, is not necessarily a “high quality material.” It is important that when it is used, that it not be machine applied, because historically stucco homes in East Sac were hand-troweled as they should be for this project. With regard to the use of stone, nothing identifies a faux-house style like the current overuse of stacked, flagstone veneer, which is not a local product. Historically when East Sac homes had stone applied it was always river rock, the most common rock in the Sacramento area. I encourage that alternative or the use of brick instead, another product with deep Sacramento roots. Roofing should be concrete tile to help mitigate railroad and highway noise and vibration.

The Permitted Uses section is again too open-ended and includes lot types such as zero-lot line and zipper lots that are unfamiliar to East Sac neighborhoods.

Based on the guidelines for the community center, it sounds like the design that has been displayed for marketing of the project is not necessarily the building that will be built. Is that true? I could not tell at all from reading the guidelines how this structure will appear.

The City is strongly discouraging the use of London plane trees.

The project should provide acorn-style lighting that is consistent in height, scale and light intensity with the historic acorn lights of East Sacramento, not the much larger, taller, brighter and glare-inducing black fixtures that have recently been installed adjacent to Mercy hospital. These new fixtures should be in the traditional sage green color.

The City should discourage the project from having its own permanent monument entrance signage if the desire is truly to have the McKinley Village feel like an extension of East Sac. The new residents should feel like they are part of an integrated community per the General Plan. A monument sign at 40th and C Streets will only emphasize an almost “gated community” feel for the project.

Permanent walls should be preferred to wood fencing that must be replaced frequently.

Bulb-outs are typically more dangerous for bicyclists as it pushes them out into vehicular traffic and should be discouraged. Sidewalks should always be separated from streets via landscaped buffers of at least 78” in width.

The PUD Guidelines should focus not just on the appearance of the project but its sustainable aspects with regard to General Plan policies and goals. Those policies include, but are not limited to, solar access, recycling of construction waste, LID practices, use of earth-friendly materials, exceeding Title 24 energy requirements, etc. If these practices are not strongly incorporated into the Guidelines than builders will be tempted to cut corners to save costs.

I encourage the Planning staff, Planning Commission and other officials to work with the developers of McKinley Village to tighten up and strengthen the PUD Guidelines for this project to ensure that a consistent, quality product and integrated new neighborhood is built on this important land parcel.

Sincerely,

David Edwards
532 39th Street
Sacramento, CA

Dear Ms. Allen:

I am one of many Sacramentans who have read and wholly support the McKinley Village project DEIR comments made by Dave Edwards. His thoughtful critique needs to be addressed, point by point, and publicly. We anticipate that the City will exercise its obligation in this matter.

From my perspective, the City is remiss in even considering a project that will seriously damage nearby neighborhoods. East Sacramento, in particular, is a classic area which embodies many ideals of neighborhood life. Such neighborhoods are the chief attractions of any city. East Sacramento invites appreciation for its shaded streets, old homes of varying design, its many modest one-story houses, its restaurants, boutique stores, parks and easy access to city bus lines. This is a livable place where people can walk or bike to school, church or shops. It is what other areas aspire to become.

To allow McKinley Village traffic to break through destroys a substantial portion of our hard-won livability. It is absolutely wrong and short-sighted to permit our secondary levee to be ruptured to funnel thousands more cars into our streets. This is not good infill; it's bad outspill. It's the imposition of traffic with vastly increased accident risk and auto exhaust carcinogens. This is not smart growth at all. Smart growth does not harm neighbors. McKinley Village proponents with their suburban aesthetic and slippery relationship with truth, think nothing of inundating our quiet streets with thousands more cars. This degrades a quality of life most of us work hard to protect. Our city councilman and our whole City Council should defend against this kind of invasive deterioration.

Another issue needs to be examined: the traffic study. It's my understanding that a current Sacramento traffic study measures only the number of times a driver is forced to pause. This is an entirely car-centric procedure. It shouldn't be called a Traffic Study at all. It should be called a Driver Convenience Study. A traffic study that ignores the needs and health of people who live on the trafficked streets is absurdly deficient. It allows analysts paid by the developer to designate traffic impact as minimal when it is anything but. If a doctor giving a physical exam reviewed only one test result, the patient could contact malpractice attorneys immediately. Yet this is exactly how traffic impact studies work. Residents who live in trafficked areas need to be part of the study. Lung and heart exposure to auto exhaust needs to be factored in. Accidents rates need to be studied. Drunk driving, road rage, inept maneuvering—all these things are impacts of traffic and all need to be included in a traffic impact study. The McKinley Village project allowed the developer to buy a narrow, phony "study" that assessed only driver convenience and then concluded "minimal traffic impact" would be visited upon East Sacramento. This is a farce and an outrageous falsehood.

I hope these matters will be addressed.

Thank you for your attention,

Pat Lynch
926 43rd St.
Sacramento, 95819

January 10, 2014

Ms. Dana Allen, Associate Planner
Community Development Department
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Re: Comments on the DEIR for McKinley Village

Dear Ms. Allen:

Thank you for the opportunity to comment on the DEIR for the proposed McKinley Village project. I am a 15-year resident of midtown Sacramento and a founding member of Friends of Sutter's Landing Park. As such, I have serious concerns about the project and the DEIR.

The developers want their project; SACOG, the City and its politicians want their "infill" growth; labor and commerce want the business. As a result, often residents of this city feel frustrated and that their voices are ignored. I know I have felt such many times in dealing with the powers that be in our city. I hope this will not be the case with this project because of the vast negative impacts it will have, as proposed, on our neighborhood (a historic cozy residential neighborhood) and Sutter's Landing Park and the wildlife that reside/forage there.

As a founding member of FOSL, I worked many hours with the City to secure a \$1.5 million River Parkways grant for Sutter's Landing Park. This grant will allow us to restore badly needed wildlife habitat to the Park, through plantings of native plants. FOSL's vision is to expand upon this to other areas of the Park, to create more open space for wildlife and the residents of our central city to access and enjoy; therefore adding to the quality of life within our city's core.

Sacramento residents made it clear they want the City to prioritize natural parklands when the City surveyed voters. According to the City's own report:

"The top priority (for voters) was large habitat areas for walking and hiking, where interpretive and educational programs can take place... Second priority is to develop parklands and areas along the American Riverbank." (2006 public opinion survey commissioned by the City of Sacramento for the City's Parks and Recreation Master Plan)

The City currently has very few park lands that meet these needs along the south side of the American River Parkway. Sutter's Landing Park provides the only feasible area along the south side of the river where the City can add park lands that meet the top two priorities expressed by the City's residents.

I am concerned that the DEIR downplays the projects impact on Sutter's Landing Park. This project will negatively impact the wildlife, through the destruction of habitat and foraging area, and the destruction of a wildlife corridor that now exists throughout the project area and Sutter's Landing Park. If you look at an aerial view of the area, you can see the important connection for wildlife of these two areas of open land. The DEIR does not appropriately address this.

Threatened species such as Swainson's hawks have been documented foraging at both Sutter's Landing and at the proposed McKinley Village site. They even nest adjacent to the proposed site because of the rich foraging there. Is it smart infill when wildlife values and open space values are degraded because of a development? I think not. Smart infill is when values for the environment are respected and protected.

All mitigation must occur on-site or directly adjacent to the Park, not "within 10 miles of the project site" as is currently proposed in the DEIR. There are opportunities to mitigate the direct and indirect losses to Sutter's Landing Park in ways that would enhance the remaining natural values of the Park. Some actions that could be taken: purchase and restore adjacent private parcels, remove the skateboard park and corp. yard to another area, restore more of the Park to its natural state.

The DEIR goes to some length to justify the proposed project over other alternatives. However, it leaves out one very important alternative which is that of restoring the property to its natural values as part of Sutter's Landing Park. According to Councilman Steve Cohn, the city was interested in purchasing and annexing the proposed project site to the Park quite recently. The proposed project site could be restored for wildlife with space for active recreation, reserving most lands in the current Park area for restoration to their natural values. The DEIR needs to consider the alternative of annexing the proposed McKinley Village site to Sutter's Landing Park. This use of the proposed site is clearly the superior environmental alternative.

Another concern I have is with the ingress and egress at 28th Street and the A Street Bridge. This is an unacceptable design, as it causes safety issues for park goers at Sutter's Landing Park and is adjacent to the mound at Sutter's Landing, which is an important habitat and foraging area at the Park. As is, the entrance to Sutter's Landing is not ADA compliant. It is already a potentially dangerous entrance to the Park because of the steep grade, the UPRR crossing (with its numerous freight trains that frequently stop across the entrance to the Park), City vehicles (including heavy equipment) that use the entrance to access the City Corp. Yard, and the large trucks that use Bell Marine. Many users of the Park cycle or walk there and it is an accident waiting to happen. What will happen when an estimated 1880 additional vehicles use this entrance to enter and exit McKinley Village? I am deeply concerned about this. It makes no sense to me at all. If this project is to be built, the western ingress/egress should be at Alhambra. That is the only logical placement of it. The developer says it is infeasible, but I beg to differ. What is infeasible is putting Sutter's Landing Park goers at more risk because of the additional number of vehicles the project would add to the entrance of the Park, so the developer can save money. The A Street Bridge should be a pedestrian/bicycle-only bridge, allowing the residents of McKinley Village to access the Park by bike and on foot.

There are well over 20 references in the EIR that describe the proposed pedestrian/bicycle connection (2-45) from the project to Alhambra Boulevard while immediately adding the qualifier "if approved by UPRR." Given that so much of this project's supposed environmental benefits are contingent on that connection, will denial of this tunnel by UPRR be grounds for denying the project? Why is the tunnel not being built in Phase 1? I urge the City to require that tunnel to be built in Phase 1 and to make it the major vehicular ingress/egress on the west side of the project, and turning the A Street Bridge into a bicycle/pedestrian-only crossing.

The arguments against the Alhambra Boulevard vehicular connection focus on negative issues while ignoring the benefits. If this is used as a 2nd connection while also connecting as planned at 40th Street, then the emergency access issue is solved, as is the train issue at 28th Street. The A Street Bridge could still be maintained as a bike/pedestrian connection. The arguments against the Alhambra vehicular connection seem to come down to cost, which does not make the connection “infeasible,” but it does make it inconvenient for the developer. Inconvenience should not trump smart planning. Smart growth and smart infill should start with smart planning. The City should require this of this project and every other “smart infill” project that is proposed. Don’t give developers free reign at the expense of the livability of our city, the historic neighborhoods of our central city and the small bit of open space we are quickly losing in the name of “smart infill”.

I have concerns about the traffic that will be added to our already over-burdened streets in midtown because of the ingress/egress being at 28th Street. C Street is already heavily travelled, as are 28th and E Streets. 1880 more vehicles, in commuter mode, will not enhance our neighborhoods in the least, but will degrade their livability. The project developers, time and again, have told us that, as urban dwellers, we should expect a lot of vehicular traffic. That is not true. We live in the neighborhood we do because of the lovely historic houses, the old-fashioned neighborhood feel of it, the quietness of it, and the convenient location to the commercial corridor of midtown and the sanctuary of the American River Parkway at Sutter’s Landing Park.

“Smart infill” should not degrade that quality of life that we have. That is not what “smart infill” is about. It’s supposed to enhance the already established neighborhoods around it. McKinley Village fails to do this, as proposed. I urge the City to require more of this project, to stand up for the residents in the surrounding established neighborhoods, to protect the fragile ribbon of natural environment and wildlife in our urban core, and require McKinley Village to be a “smart” project. If not that, then the DEIR needs to consider the alternative of annexing that property to Sutter’s Landing Park to enhance the natural values within our urban core.

Peace,

Lori Ward

Dana Allen

From: Doug Desalles <ddesalles@gmail.com>
Sent: Friday, January 10, 2014 11:43 AM
To: Dana Allen
Subject: Fwd: McVillage DEIR

Follow Up Flag: Follow up
Flag Status: Flagged

Douglas DeSalles MD
107 San Antonio Way
Sacramento, 95819
916.452.3357

Re: Project PO8-806, McKinley Village

Ms Allen,

I have several questions/comments about this project.

1. The DEIR refers to mitigation measures related to the loss of Swainson's hawk's foraging habitat. The DEIR incorrectly notes that there is very little suitable foraging habitat within 5 miles of the project. This bird nests in my Monterey pine. Having picked up many dead small animals which fell from the nest after being returned to feed the chicks I am certain that ground-based rodents are collected by the hawk from nearby fields - including the site of the project itself.

The loss of this open land seems certain to impact the feeding habits of this threatened species and despite the assertion that "compensation" for this habitat loss will be made I want to know what will be done when the hawks leave the current nesting site in my tree. How will citizens be able to check of on the supposed monitoring of the bird population in the wake of the project? And what recourse will be have if, as expected, the birds leave the area entirely. And what does "acquisition and/or preservation of similar or better habitat" mean in practical terms? Does the developer get a pass if he claims he is "setting aside" other land that he will not develop also?

2. In the wake of a future flood on the American River how will the tunnel holes be closed to protect the rest of East Sacramento from rising waters if the tunnel itself is the only evacuation route for the people living in the new development? Will this breach in our secondary levee system not create a significant increase in risks to the rest of the neighborhood?

3. Given that the Theodore Judah school is already so crowded that neighbors are not guaranteed that their children can attend there how will the new resident's children be accommodated? Will these kids not require additional bus/car traffic to reach other schools in the area?

4. Why are the developer's costs being put above the interests of current neighbors? Prior plans for this development always included the logical entrance points of Lanatt St and Alhambra Blvd. By routing traffic through the developers property to abut C street between Tivoli and 40th St (and using the small freeway overpass to join B st) Mr Angelides evidently saves a lot of money. But the traffic of smaller streets will increase dramatically whether the city judges the impact "significant" or not. A flow going off Lanatt onto Elvas

or C (or directly onto Alhambra) from the development is a more logical augmentation of normal traffic. Current residents are being asked to absorb costs of increased noise and traffic to simply save Angelides money.

5. The DEIR estimates that 48% of the traffic in and out of the development will go thru the new road in the cannery business park to a stoplight at C st. Was any compensation made for the fact that people leaving and entering the western entrance of this development must cross two busy rail lines? After being blocked by a train at this entrance will they not adopt the eastern entrance as their favored way in or out? And what recourse will neighbors have if it turns out that a much higher percentage of cars are dumped onto C St than estimated.

6. DEIRs are paid for by developers and always have a tremendous bias in favor of those who wish their projects to go forward. The city appears to be assisting Mr Angelides in claims that traffic impacts will be "less than significant". What recourse do citizens have if traffic increases dramatically down what today are quiet streets. What independent sources have been consulted to check whether the numerous assumptions being made in the traffic models are valid?

7. Why is the developer being allowed to build homes without ANY supporting commercial development? As it stands everyone in the McVillage will have to shop at Compton's and buy their coffee at the Queen of Tarts by leaving the development. Meanwhile current residents will have NO new options for shopping made available. Why is this plan being given approval in light of this negative impact?

8. The developer touts the new swimming pool which will be a part of the development. Will this not be open only to McVillage residents whose HOA payments maintain it?

9. Why does the traffic study not address the negative impact to residents at the north end of East Sacramento of a stoplight which will pile up cars behind red lights?

10. Why are current DEIR traffic estimates so much lower than one done in prior evaluations?

Doug DeSalles

January 10, 2014

Ms. Dana Allen, Associate Planner
Community Development Department
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

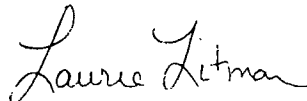
Re: Comments regarding the DEIR for the McKinley Village Project

Dear Ms. Allen:

As a resident of midtown, I am concerned about the impacts of the proposed McKinley Village project on my neighborhood and on our nearby treasure, Sutter's Landing Park. The DEIR did an inadequate job in addressing the impacts to these areas. Since many of my neighbors and local organizations have already covered most of the major issues, I will just enumerate a few major points.

- The increased traffic from the proposed 28th St access will lower our quality of life, make walking and bicycling in the neighborhood more dangerous, and is unnecessary. The developer should be required to create an access point at Alhambra, the only logical place for it. If the developer can't afford to do this, then the project is not feasible and should not be approved.
- The traffic analyses in the DEIR were inadequate. They did not even look at the increased traffic flow on F & G Streets and underestimated the traffic and safety issues for C St.
- The cumulative impacts of the development to Sutter's Landing Park, both direct and indirect, were not adequately discussed. These would be substantial and significant—including traffic, increased use, loss of park land, impacts to wildlife, loss of habitat, and others—and need to be fully identified and mitigated. All mitigation should be either onsite the Park or directly adjacent, not "within 10 miles" as is planned in the DEIR.
- An alternative option to annex the project site to Sutter's Landing Park was omitted from the DEIR and should be added.
- The proposed project is not "smart growth" as it isn't transit-oriented, high density, multiuse, or bicycle/pedestrian friendly. Instead it is a car-centric suburban neighborhood in the midst of the city. The project should be required to take steps to lower carbon emissions and create a green development, such as put in the ped/bicycle tunnel in the first phase, add solar panels on all homes, and other steps to shrink the carbon footprint of the development.
- The development dedicates only 2.4 acres to parkland, less than that currently required by the City, which will put a greater burden on the adjacent Sutter's Landing Park and needs to be mitigated.
- The DEIR did not address many of the concerns presented by the public in response to the NOP. It should be revised and redistributed to address those omissions.

Sincerely,



Laurie Litman
301 27th St, Sacramento

Dana Allen

From: mmarsh@sco.ca.gov
Sent: Friday, January 10, 2014 1:11 PM
To: Dana Allen
Subject: Proposed McKinley Village Residential Development - Environmental Impact Report

I am very concerned about the negative impact the proposed McKinley Village Residential Development will have for the residents, workers and business owners in East Sacramento.

The traffic analysis in the draft environmental impact report suggests the impacts of added traffic are fairly minimal. Define fairly minimal for the residents, labor force and business owners in East Sac! I have not heard of any plans to include public transportation in the proposed McKinley Development.

I grew up in East Sac, live in East Sac and work in East Sac. I have witnessed the major increase in traffic on Alhambra Blvd., Folsom Blvd., J Street, H Street, C Street and Elvas Ave. over the past couple of years. There is a direct correlation between our congested freeway system and the increased traffic on thoroughfares through East Sac. Since the change in the lanes on J Street and Folsom Blvd., there is even more traffic on H St., and C St/Elvas Ave.

I live on 41st & A Street and work at the Cannery Business Park on C Street. I witness the traffic situation on a daily basis. One of the entrances to the proposed development is between the main entrance for cars to access Mercy Cancer Care & Imaging Center, Wood Rodgers, the State Controller's Office and a Vending business. There is already congestion in this area without adding the access to the proposed development. The idea of closing the E Street freeway ramp makes no sense – the area is already congested and drivers will have to travel further in town to access the freeway. When the Sutter Memorial Hospital site is redeveloped, this will also add to the congestion in the area. As a resident of East Sac, I don't think we need to saturate the area with both developments.

The development in our city should be considerate of the environment, our citizens and future generations of Sacramentans instead of being primarily focused on making a profit and the current trend of eliminating green space for the purpose of infill development.

Sacramento is not experiencing a housing need – we have many areas that would be better suited for growth and our environment that would not increase traffic and would also promote travel by foot or bicycle. Let's focus on making the downtown area viable again instead allowing projects that will harm the integrity of our neighborhoods.

Thanks for your consideration,

Mallory Marsh
4116 A Street
Sacramento, CA 95819

Why is it necessary to develop all the green space in Sacramento?
Mallory Marsh, State Controller's Office
Division of Accounting and Reporting – Tax Administration Section
(☎: (Direct Dial) 916.322.6142 | 📠: (E-Fax) 916.323.3193. | ✉: mmarsh@sco.ca.gov

Dana Allen

From: Idemas@demaslaw.com
Sent: Friday, January 10, 2014 1:37 PM
To: Dana Allen
Subject: McKinley Village project Section 9 - Transportation and Circulation DEIR

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, California 95811

McKinley Village project Section 9 - Transportation and Circulation

I am submitting the following comments on the Draft Environmental Impact Statement for the McKinley Village project. My comments are directed to Section 9 - Transportation and Circulation.

The recording of the traffic in the affected is seriously flawed because the count of vehicle traffic and the direction of the travel paths were limited to traffic complying with traffic laws. I could not find in the traffic records any evidence that vehicles that entered streets in violation of traffic calming ordinances were counted or their actual illegal travel paths being indicated in any way.

I live near the intersection of 28th and E Streets. A long standing traffic barrier at the intersection is intended to prevent non-emergency or otherwise essential vehicles from entering E street in the westerly direction. City ordinance makes it unlawful to do so. The barrier is ineffective, and the threat of a fine if violated is equally ineffective. At times (night and day) there is more traffic entering E Street at the barrier illegally than there is passing out of E Street legally.

Those passing around the barrier are very often distracted and are focused on avoiding a police presence. This presents a serious danger to other vehicles, and pedestrians and particularly to bicyclists on this heavily traveled bike path. My neighbors and I have repeatedly complained to Sacramento city officials of the lack of enforcement of the traffic calming ordinance at this intersection. I have made complaints to Council Members Kohn and Hansen and the former city police chief. None of us have any meaningful responses or action.

Traffic calming ordinances are not enforced because it is a cost to the city to enforce them and the city does not receive any revenue for convictions. The traffic study should have also analyzed the effect of non-enforcement of the traffic calming ordinance.

I observed one of the traffic counts done under the study for the 28th and E Street intersection. I spoke to the person who was observing the traffic, counting the vehicles and recording their travel paths. I asked what instructions were given to record the prohibited travel around the barrier.

The response was that only the permitted travel was to be recorded. This strongly suggests that some vehicles were either not counted or that they were counted but the directions they traveled were recorded as to incorrectly indicate lawful travel. For the E and 28th Streets intersections, hundreds of vehicles would have been ignored or incorrectly recorded.

While traffic lights and stop signs are intended to actually control traffic, the traffic study candidly states that the traffic calming controls are only intended to "discourage" prohibited travel. The substantial increase of traffic at this intersection can only exacerbate the problem with the concomitant elevated danger.

There is no reason to believe that the flawed study methods for the intersection of 28th Street and E Streets were not repeated for the other intersections and travel corridors of the study.

It is submitted that the project should not go forward without the completion of a traffic study that records actual travel and also reflects the effect of human nature on projected travel patterns.

Louis Demas
2713 E Street
Sacramento, CA 95816

mail2web.com – What can On Demand Business Solutions do for you?
<http://link.mail2web.com/Business/SharePoint>

From: JAN ELLEN REIN [<mailto:janny007@sbcglobal.net>]
Sent: Friday, January 10, 2014 1:48 PM
To: Dana Allen
Subject: Comments re DEIR for McKinley Village project

Dana Allen,
Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811

January 10, 2014 at 1:45PM

Dear Ms. Allen.

Below are my comments on the *Draft Environmental Impact Report for the McKinley Village Project*. Please acknowledge timely receipt of these comments.

Thank you,
Jan Ellen Rein
Midtown Resident

COMMENTS RE DEIR FOR MCKINLEY VILLAGE PROJECT

General Comments

We the people have the right to expect a dispassionate evaluation of any proposed project, including the proposed McKinley Village project. Yet the DEIR gives the distinct impression that its drafters decided to support the project before they even began their evaluation and then conducted their evaluation by cherry picking for assumptions and data that would support the project. The DEIR itself seems designed to justify the project by massaging the data and leaving out inconvenient concerns and facts, to make it look like the project will not have significant harmful impacts on future project residents and those residents already living in the adjacent neighborhoods of East Sacramento and Midtown.

For example, the DEIR consistently measures distances from the edge of the project when measuring from the center is clearly more realistic.

Planning in this city has been dominated by developers and the McKinley project is no exception. Citizens like me sense that city decision makers are captured by and serve only the big money interests. City decision makers seem to view the town hall meetings and DEIR evaluation as just a matter of going through the motions of evaluating the project and seeking community input when, in reality, the power elites have already decided that this is a done deal. To the power elites, the so called evaluation and town meetings are just

obstacles to be overcome on the road to building the project. The public already distrusts government. All this breeds even more public cynicism and distrust of government.

The only justification I hear for this project is that it will somehow reduce urban sprawl. Yet, no one has explained how the McKinley Village project will reduce suburban sprawl by 328 housing units. Judging by recent county and city planning decisions, suburban sprawl will increase just as much as it would with or without this project anyway. All this isolated suburban type community bedroom project does is bring urban sprawl into the city.

Flawed mitigation analysis

The DEIR consistently finds that the impacts from air pollution, increased traffic, etc are significant but then, through the magic of makeweight mitigation, finds that they will be insignificant. But the DEIR's stated mitigating factors and mitigation measures are based on inappropriately rosy assumptions, speculation and leaps of faith that bear scant relation to reality or to the lived experience of actual human beings who reside in the nearby affected neighborhoods, already burdened by too much traffic and too much air pollution.

Example 1: In Section 4.1 on "Air Quality and Climate Change", the report states : Regarding assessing future TAC emissions and potential health risks, while traffic on a given roadway would increase over time, motor vehicle emissions tend to decrease over time due to increasingly stringent state and federal air quality regulations and replacement of older vehicles." Really? This is a super stretch based on pure speculation. How do the DEIR authors know what kinds of legislation will be passed in the future or how such legislation would affect the particular neighborhoods in question--the project site and the adjacent neighborhoods of East Sacramento and Midtown.

Example 2: In discussing the danger of flooding, the DEIR executive summary states that "[t]he project site is located in an area designated as having 100-year flood protection so impacts associated with flooding were determined to be less than significant . . ." Are they kidding? In the wake of hurricane Katrina's catastrophic destruction of New Orleans, there were many undisputed reports stating that Sacramento is at even greater risk of catastrophic flooding than New Orleans. These reports stress that 100 year flood protection is woefully inadequate and that 200 or even 300 year protection may not be adequate. The proposed project is in a flood plane. In this time of climate change and increasingly severe weather events, how can the DEIR drafters say with a straight face that the flood impacts would be "less than significant"? Have the DEIR authors learned nothing from Katrina? This would be laughable if the danger to human life and health were not so serious. Is it really a good idea to plunk a new community into a flood plane with only two access points from which residents could escape a flood? And, who would pay for the damage: the developer who richly profited from the project or already burdened city taxpayers?

Example 3: At several junctures, the DEIR says that the payment of mitigation fees by the developer will reduce the project's harmful effects on the environment, human health, and nearby schools. Yet, unless I'm missing something, the DEIR does not explain how these money payments will translate into harm reduction. This looks like another case of speculation and wishful thinking.

The DEIR does not address how mitigation measures will be monitored for compliance and efficacy or how compliance will be enforced at a time when enforcement budgets and personnel are being cut to the bone. Therefore, even if some of the mitigation measures would theoretically work to reduce harmful impacts from significant to less than significant (a very dubious assumption) there is no realistic assurance that the proposed mitigation measures will even be put in place or enforced. Another leap of faith!

The McKinley Village project is not an infill project

The DEIR erroneously assumes that the McKinley Village is an infill project. As properly understood, infill is the development of underused or blighted buildings and vacant, abandoned, blighted or underused lots of land scattered throughout a variety of locations within an already built up mixed use area with *already existing*

infrastructure such as roads, public transit and neighborhood-serving retail establishments. The General Plan defines infill development as “development of underused buildings and vacant lots in areas “*served by existing infrastructure.*” The project site has no infrastructure. There are no roads, lighting, utilities or public transit. All of the infrastructure is outside the 50 acre project area and at a significant distance from it. Most of the infrastructure outside the project site is not within walking distance of most of the project so the project will be extremely car-centric which is inconsistent with smart growth policies.

The City’s Infill Strategy (Resolution 2007-277) defines infill as existing on five (5) acres or less except when the the area is designated as “an infill target area”. The resolution does not deem the McKinley project site to be “an infill target area”. It strains credulity to say, as the DEIR apparently does, that a project site ten (10) times larger than the five (5) acre or less definition of infill could be within the contemplation of the City’s Infill Strategy.

If built, the McKinley Village project will plunk an entirely new and isolated 50 acre suburban type bedroom community into a flood plane and accessible to the rest of the city through only two access points. Surely that is in direct contradiction to the city’s stated smart growth policies.

The McKinley Village Project does not meet commonly understood standards of Sustainability. It is the opposite of sustainable.

Environmental sustainability implies that natural resources will not be needlessly used up faster than they can be replenished. The DEIR does not seem to care whether or not the proposed project is sustainable. In fact, it seems to deliberately hide the project’s inherent unsustainable nature. *For example*, it uses a 2.0 person per household number to conclude that at buildout the project will have a total population of 656 residents. That estimate is completely arbitrary. The project calls for 3, 4 and 5 bedroom houses with typical square footages in the range of 2,500 to 3,000 or more. Additionally, 25% of the houses will have ‘granny flats’ which, by definition, are meant to be lived in. On what basis can the DEIR claim that only two people will occupy such large houses? Does the DEIR assume that new residents will not have children? I believe a more realistic estimate would be anywhere from 1,000 to 1,500 new residents. The addition of this many new residents will strain the city’s already limited energy and water resources. In a time of drought when the city is on the brink of requiring its residents to take 5 minute showers, forgo lawn watering, and install low flush toilets, etc at considerable personal expense, an additional 1,000 to 1,500 city residents with new lawns to water, toilets to flush, showers to take, etc. would put greater pressure on our very limited water resources.

Even if we were to accept the DEIR’s project population estimate (based on a 2.0 resident per household figure) as realistic, that also marks the project as unsustainable. Two people do not need houses with 2,500 to over 3,000 square feet. It is an extreme waste of natural resources to build such large houses for only two occupants.

Rather than decrease auto-dependency, the proposed project increases it by failing to include retail amenities within the project site that project residents could conveniently reach by foot. There is no proposed transit within the area. The DEIR also seems to assume that project residents will only travel short distances by car. How do the DEIR drafters know where project residents will work? Two of my neighbors on E Street commute to and from San Francisco. The project also includes gas emitting fireplaces in each home, which will also increase the already high level of air pollution trapped in our topographical bowl. All this is another blow to air pollution reduction and sustainability.

The DEIR’s analysis fails to evaluate the project in the context of smart growth policies and erroneously concludes that the project is “generally consistent” with the General Plan.

To reach this conclusion, the DEIR ignores many smart growth General Plan goals and policies that should lead to disapproval of this project. Several examples follow.

New neighborhood design is supposed to incorporate a mix of residential and non-residential uses, including retail that serves the day to day needs of residents. There is no retail in the proposed project. It is a purely residential suburban type bedroom community. The General Plan calls for new neighborhoods to include transit stops. There are none included in the project. The 48 acre project has all the characteristics of a new growth area yet the DEIR treats it as a non new growth area, thus trouncing policies calling for the inclusion of low income housing. It does not provide for mixed uses and housing types for all socioeconomic classes. It does not create diverse neighborhoods. It increases the demand for water. It is isolated from the rest of the city both in terms of public transit and access to other areas by car. (There are only two points of exit and ingress.)

The DEIR ignores or plays down serious health risks

The DEIR 'Health Risk Assessment for the McKinley Village Project, Appendix C, focuses almost exclusively on cancer risks, ignoring or glossing over other major health risks from serious air pollution that has already adversely affected the respiratory health of people living in the Sacramento bowl. Only in Section 4.3 on 'Non Cancer Health Risks' does the DEIR mention the risks of heart disease and respiratory disease, giving it only 1 and 1/2 pages of treatment that does not include any fact based analysis. Yet this is a serious problem which the McKinley Village project would exacerbate in several ways.

First, open spaces are the lungs of a city. That is one reason why New York City 's Central Park is so treasured. Development of a 328 unit bedroom community would eliminate the air cleansing effect of a vegetated, carbon absorbing, water absorbing 50 acre open space. The project would, indeed, increase the city's pollution in many ways already noted. Because the project has only 2 vehicular access points, the project will significantly increase traffic volume in the already too heavily trafficked area of Alhambra and 28th. This in turn will substantially increase air pollution in the surrounding neighborhoods which already suffer from too much air pollution.. Timing of lights and striping of lanes will do nothing to reduce car volume or to reduce the increased pollution from the excessive number of cars put into circulation by this project.

Second, as noted, the project is extraordinarily car-centric. It calls for 2 car garages when people in midtown seem to get along just fine with no garages or one car garages. Two car plus households, no nearby public transit and no retail amenities within convenient walking distance portend and even more toxic brew than the terrible toxic view that we already have. I can't conceive of how such a project would not create significantly greater adverse health outcomes.

Third, during the construction period all the dirt moving and chemical use will produce a haze of dust and pollution on steroids that will not be confined to the project area. The DEIR comforts itself with the thought that this will be temporary. But a year or two of breathing in such overwhelming pollution can do a lot of health damage, especially to the health of those in adjacent neighborhoods which already suffer from too much pollution. I can't recall where but I believe one portion of the DEIR said this would all be mitigated by watering the entire 48 acres twice a day. Yet, with the drought conditions that are prompting the city to require residents to take shorter showers and to refrain from watering their lawns, a twice daily watering of nearly 50 acres mitigation just substitutes one harm for another. This seems like a cure that's just as bad as the the disease. I just don't see how mitigation can make this ill conceived project acceptable.

The city of Sacramento is already too polluted. Therefore, any increase from the project is unacceptable or, in the parlance of the DEIR, significant regardless of mitigation. Increased pollution from the project will affect me personally in a significant way. I have lived on E Street between 27th and 28th Streets for 25 years. When I step outside, I am always struck by the film of black pollution I see on my white car and the white railing on my porch. I shudder to think that I am breathing this stuff and the even more dangerous smaller particles from carbon and gas emissions into my lungs 24 hours a day, 7 days a week year after year. Even in my house, dusting seems an act of futility because the film of black pollution continuously seeps into my house. Last year my allergy doctor gave me a lung capacity test and told me my lung capacity was significantly below average for my age group based on national data. When I asked my doctor how I might increase my lung capacity, he advised me to move away from Sacramento which is not feasible for me economically. Any

increase in pollution will further impair my breathing capacity and probably cause other respiratory problems. For reasons previously noted, this project does not seem to serve any worthy policy goals. Why should my health and the health of others be sacrificed so that the developer can reap a huge profit.

The decision making process does not allow consideration of other uses of the property that might better serve the Sacramento community.

The McKinley project would take up nearly 50 acres of land. The way the process currently works, the developer proposes a project and the city government and its planners react to that proposal alone. This leaves no room for considering whether other uses of the property might better serve the interests of the city and its residents.

As indicated, open spaces serve as the lungs of a developed city. We should treat large open spaces like the proposed project site as a city treasure to be preserved as a sanctuary for city residents and as a pollution absorbing, water absorbing green space. Rather than just reacting to this project proposal, the City should consider turning this treasure into a public park, filled with trees and other carbon absorbing vegetation. Parts of the space could be turned into orchards which would delight the eye while also absorbing carbon emissions.

I urge city officials to think outside the imprisoning box we have built for ourselves.

Will the planing decision makers actually read the comments?

I have heard that the comments submitted will be summarized in one document so that the planning department decision makers will not even read the individual comments submitted by city residents. I hope this is not true. A summary cannot convey the logic and argumentation in the individual comments and is vulnerable to massaging and editorializing to support the project. This would make a mockery of citizen input.

This is a democracy issue

The decision whether or not to approve this project is, or should be, a democracy issue. Who should decide? Should it be the developer who will not be affected by this project in any way other than making a large profit? Or should it be the many residents whose health, safety, and property values will be adversely affected by the project. To me, the answer is obvious. Listen to the people who live near this project and will bear the burden of its existence.

Respectfully submitted
Jan Ellen Rein
Midtown Resident

Chris Smith

615 27th Street
Sacramento, CA 95816

Phone: (916) 712-6979
Chris@SacTownRealEstate.com

1/10/2014

To: City of Sacramento
Dana L. Allen, Associate Planner
Re: McKinley Village Project

Dear Ms Allen,

Thank you for taking the time to review my comments about the McKinley Village Project. As a 50 year resident of Sacramento County, 13 of them living in Midtown, I have seen a lot of growth in the areas housing stock. I am a Real Estate Broker and have worked as a new home sales agent in the past so I am not adverse to new construction, but I've some concerns about this project.

My major concern regards the traffic impacts on 28th Street and the surrounding neighborhoods. To make it easier for you I will summarize my points in the beginning of this letter and follow up with how I came to those conclusions:

- 1) Using Level of Service (LOS) for determining impact does not consider how the livability of the surrounding areas will be impacted by a 29% increase in traffic.
- 2) LOS impacts may be understated causing a LOS of "F" at 28th Street- C Street to E Street.
- 3) A 28th Street half street closure should be completed in the first phase of the project.

Note: All items in Italic are taken from the McKinley Village Project, Draft EIR SCH 2008082049.

1) Using LOS for determining impact does not consider how the livability of the surrounding areas will be impacted by a 29% increase in traffic-

Each study roadway facility was analyzed using the concept of Level of Service (LOS). LOS is a qualitative measure of traffic operating conditions whereby a letter grade, from A (the best) to F (the worst), is assigned. These grades represent the perspective of drivers and are an indication of the comfort and convenience associated with driving. In general, LOS A represents free-flow conditions with no congestion, and LOS F represents severe congestion and delay under stop and go conditions. (4.9-21)

I understand that there needs to be a quantitative measurement to help the analysis of traffic impacts and LOS does a good job from the perspective of the DRIVERS. Unfortunately it doesn't address the impact on the RESIDENTS.

Table 4.9-9 shows that the LOS at 28th and C Street to E Street will increase from 3,850 to 4,972, a 29% increase in average daily traffic. Using the assumptions in the Draft EIR (which I think are low) a 29% increase in traffic will have a dramatic affect on the lives of the people living in this area. An increase in traffic that causes a driver to wait longer at an intersection may be an inconvenience to the driver, but it will be a significant impact on the lives of the residents.

2) LOS impacts may be understated causing a LOS of "F" at 28th Street- C Street to E Street -

Table 4.9-9 estimates the Average Daily Traffic (ADT) at "28th Street- C Street to E Street" will increase by 1,122 trips to 4,972. This puts the LOS at "E". If the ADT increases by only 29 trips per day more than estimated the LOS would be "F" (over 5,000). With the estimate being so close to pushing the

LOS into the F category we need to be sure the analysis is as good as possible. My concerns are that:

A) The number of residents per dwelling unit seems understated. If the number of residents is even slightly higher than projected the LOS will be pushed into the "F" category. Chapter 3 "Land Use, Planning and Population" estimates 2 residents per household (page 3-4) although the estimated population of Sacramento is 473,509 and the number of housing units (table 3-1) is 191,380 making an average of 2.4 residents per unit. Even a slightly higher number of residents per unit would push up the traffic count.

B) Assuming the methodology is correct, there is some conflicting data that could affect the LOS. Table 4.9-8 "Project Trip Generation" states the project will result in an additional 3,507 daily trips. Figures 4.9-7 "Inbound Trip Distribution" and 4.9-8 "Outbound Trip Distribution" both show 52% of the trips going in or out at 28th Street. 52% of 3,507 is 1,823 additional trips through this intersection. Also, the Draft EIR states: ... *The project would result in a net increase of about 1,800 daily trips to the at-grade railroad crossing on 28th Street under Existing Plus Project conditions.* (4.9-59) The ADT on table 4.9-9 appears to be understated by at least 700, much more than the 29 trips necessary to push this into the "F" category.

C) When the "Cumulative Conditions" are included in the analysis this section of 28th Street will be well into the "F" Category with a count of 6,500 ADT (table 4.9-14).

Why is making sure the LOS doesn't go to "F" so important? If the analysis is off by even 29 trips per day this project should provide improvements to the city's transportation system, hopefully within the neighborhoods that are affected by the increase traffic:

Study intersections numbered 1-9 located on 28th, 29th, and 30th Streets are within the Core Area and are governed by Policy M 1.2.2 (a). LOS F is acceptable during peak hours, provided that the project provides improvements to other parts of the citywide transportation system within the project site vicinity (or within the area affected by the project's vehicular traffic impacts) to improve transportation-system-wide roadway capacity, to make intersection improvements, or to enhance non-auto travel modes in furtherance of the General Plan goals. Road widening or other improvements to road segments are not required. (4.9-45)

3) A 28th Street half street closure should be completed in the first phase of the project.

As stated above I think the impact on 28th Street and the other adjacent streets will be significant. The Draft EIR recommends:

... Given these findings, the City should monitor 28th Street traffic volumes after construction of the project to determine if a half street closure is necessary at the C Street/28th Street intersection to prevent traffic from continuing southbound on 28th Street at this location. Installation of a half street closure would result in lower traffic southbound traffic volumes on 28th Street by diverting traffic onto C Street (eastbound), where drivers would then continue southbound on 29th Street (which is designated as an arterial roadway in the 2030 General Plan). (4.9-94).

My concern is that if we wait to make these changes who will pay for it, the city? Who will determine if it is necessary and by what criteria? Mitigation for the increased traffic needs to be done in the first phase of the project and paid for by the developer.

As stated above I think the Draft EIR does not adequately address the impacts this project will have to the livability of the surrounding neighborhoods. I would respectfully suggest the City require a lower housing density (less units = less traffic) or make sure adequate mitigation measures are addressed in the approval process.

Sincerely,

Chris Smith

Dana Allen

From: Robert Winger <robertw@sacramento rentals.com>
Sent: Friday, January 10, 2014 2:05 PM
To: Dana Allen; 'vitosgromo'; Evan Compton; Steve Cohn; Sue Brown; 'Jameson Parker'; Peter Fenolio; ILee Muller; Anne Romo; Consuelo Hernandez; Steve Hansen
Cc: 'Alan Parker'; 'Dale Kooyman'; 'Vickie Valine'; mhvaline@gmail.com; 'Burgua William'; 'Karen Jacques'; 'Smith Clara'; smdtyler@aol.com; berdany@aol.com; 'BUSS Margaret'; 'Smith Clara'; 'Ed Trujillo'; Anne Romo; 'DAMJANOVIC Martha'; 'Rhee, Foon'; 'Paul Harriman'; 'Laurie Litman'; 'Paul Tsamtsis'; 'Marion Millin'
Subject: RE: McKinley Village Proposal Response January 9, 2014

Dana Allen

I agree with what Vito Sgromo statement. I am also a property manager in the midtown and east Sacramento area. I also own a house on 232 40h Street which I will be moving into next year. This will hurt a great area. It is a wonderful place to live now.

Thanks Robert Winger (916)446-6663

From: Dana Allen [mailto:DAllen@cityofsacramento.org]
Sent: Friday, January 10, 2014 9:11 AM
To: vitosgromo; Evan Compton; Steve Cohn; Sue Brown; 'Jameson Parker'; Peter Fenolio; ILee Muller; Anne Romo; Consuelo Hernandez; Steve Hansen
Cc: 'Alan Parker'; 'Dale Kooyman'; 'Vickie Valine'; mhvaline@gmail.com; 'Burgua William'; 'Karen Jacques'; 'Smith Clara'; smdtyler@aol.com; berdany@aol.com; 'BUSS Margaret'; 'Smith Clara'; 'Ed Trujillo'; Anne Romo; 'DAMJANOVIC Martha'; 'Rhee, Foon'; 'Paul Harriman'; 'Laurie Litman'; 'Paul Tsamtsis'; 'Winger Robert'; 'Marion Millin'
Subject: RE: McKinley Village Proposal Response January 9, 2014

Thank you for your comments Vito

Dana

From: vitosgromo [mailto:vsgromo11@comcast.net]
Sent: Thursday, January 09, 2014 11:36 PM
To: Dana Allen; Evan Compton; Steve Cohn; Sue Brown; 'Jameson Parker'; Peter Fenolio; ILee Muller; Anne Romo; Consuelo Hernandez; Steve Hansen
Cc: 'Alan Parker'; 'Dale Kooyman'; 'Vickie Valine'; mhvaline@gmail.com; 'Burgua William'; 'Karen Jacques'; 'Smith Clara'; smdtyler@aol.com; berdany@aol.com; 'BUSS Margaret'; 'Smith Clara'; 'Ed Trujillo'; Anne Romo; 'DAMJANOVIC Martha'; 'Rhee, Foon'; 'Paul Harriman'; 'Laurie Litman'; 'Paul Tsamtsis'; 'Winger Robert'; 'Marion Millin'
Subject: McKinley Village Proposal Response January 9, 2014
Importance: High

January 9, 2014

Dana L. Allen, Associate Planner
Environmental Planning Services
Community Development Department
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

McKinley Village Proposal Response PO8-086

I am resubmitting my July 7, 2013, see below and attached, response with amendments.

Amendments:

1. Traffic Study.

Study Flaws: The traffic study completed for the McKinley Village project has failed to consider several major urban planning and traffic models that are critical to determine accurate automobile traffic volumes.

Pass-By Traffic

According to the Institute of Transportation Engineers two major considerations for any traffic study that includes new access roads between two established city sections should include, "pass-by" traffic. New developments such as the McKinley Village Project will create a new artery of traffic between the central city and East Sacramento, River Commons and eastern sections of the city of Sacramento, This will have a **20% to 25 %** of increase of traffic above the increases created by daily trips of residents within the housing developments of McKinley Village.

Future Growth

According to the Urban Planning Institute, The Institute of Transportation Engineers and American Association of State Highway and Transportation Officials Guidelines, all new development traffic studies must include calculations for future growth of the proposed new development and the surrounding jurisdictions. According to the existing City of Sacramento General Plan, the Central City current population will grown from approximately 48,000 to 135,000 by 2013. This will be caused mainly by the UP Central City Railyard Infill Project. Also increased east west traffic will also be the result of the Arena Entertainment District. Access to these two major developments will require utilization of the roads that are now planned to connect the McKinley Village project with Midtown and East Sacramento. The traffic study failed to calculate this major impact that can also increase traffic by **20% to 30 %**.

Due to these two major flaws the traffic study has grossly underestimated the full impact of the McKinley Village traffic on the nearby residential streets zoned for only local traffic volumes. If these two factors are used to augment the projected traffic volumes from the completed McKinley Village traffic study then the volume of traffic will exceed the capacity of the locally zoned residential streets.

Recommendation:

River West Investments should re-design the access points into their proposed housing developments to connect with city streets designated as collectors or arterials such as Elvas Boulevard through Lanett and to Alhambra Boulevard.

Vito Sgromo
Cell 916 719-1477

I am writing to respond to the proposal by River West Investments to build 325 homes at the Assessor's Parcel Number 001-0170-028. The project site is bounded on the south and east by the elevated portion of the UPRR tracks and on the north and west by the Capitol City Freeway.

If approved as proposed, this project has major negative impacts to several regional development projects and future area transportation expansions.

1. Sutter Landing Parkway (Richards Boulevard Connector).

The General Plan (<http://www.sacgp.org/index.html>) has identified the future development of a parkway road, Sutter Landing Parkway (Richards Boulevard Connector) as a road that must be built to connect the I50 Highway to the Sutter Landing Regional Park, Route 160, to the major Railyard Central City Development and the new proposed arena and surrounding Downtown entertainment district. The Sutter Landing parkway is critical to the development of a regional park, the largest urban infill project in the West Coast and the new arena.

Negative Impact: McKinley Village Proposal would if approved would eliminate the Sutter Landing Parkway by abandoning the Elvas Roadway and Lanett route and eliminating the needed land inside the proposed McKinley Village Proposal.

Recommendation: River West Investments must alter their plans by allow enough land for the future Sutter Landing Parkway and abandon the 40th Street underpass and use Lanett Street as the underpass to connect to Elvas Boulevard Road.

2. Union Pacific Railroad Expansion

UP is planning additional train lines (see attached reports, Sacramento Roseville 3rd Track and CAL HSR).

Negative Impacts: River West Investments must set aside sufficient land to allow UP to expand. Also these additional train lines and the train traffic will eliminate the use of 28th Street as an access point for the McKinley Village Housing Proposal.

Recommendation: River West Investments must set aside sufficient land to ensure UP can add the additional tracks. Also River West Investments must designate 28th Street as a bike and pedestrian access since in the near future it will no longer be available for automobile traffic and enlarge the opening at Alhambra for 2 way auto traffic.

3. Caltrans I80 Expansion

Caltrans is planning a future expansion of the I 80 Highway that borders the McKinley Village Project (See attachment SR 51 PL Final 01-08-13). This should include on and off ramps to connect to the Sutter Park Landing Parkway.

Negative Impacts: River West Investments has not allowed sufficient land to allow Caltrans to expand I80 thereby improving a bottleneck highway, reducing pollution and connecting with the Sutter Landing Parkway.

Recommendation: River West Investments has to redesign its housing proposal to allow sufficient land for the Caltrans expansion and the addition of an on and off ramps to connect to the Sutter Landing Parkway.

4. Traffic Impacts to Local Streets

River West Investments is funding a traffic study on the impacts of their proposal to access 28th and 40th Streets for automobile access to the McKinley Village housing project. According to the General Plan (<http://www.sacgp.org/index.html>) both streets are designated as local streets.

Negative Impacts: Although the traffic study has not been completed, the increase traffic could potentially exceed the capacity of the local streets.

Recommendation: River West Investments should re-design the access points into their proposed housing developments to connect with city streets designated as collectors or arterials such as Elvas Boulevard through Lanett and to Alhambra Boulevard.

5. Caltrans New Proposed Capitol Railyard

Caltrans is currently examining the use of the land River West Investments has proposed for their housing project for a major new railyard and maintenance facility for Amtrak trains. Caltrans needs to build a new maintenance facility for Amtrak's Capital Corridor and San Joaquin Corridor trains (See attached Sacramento Bee Article, Friday July 5, 2013)

Negative Impacts: River West Investments if approved would have a very serious impact to the expansion of train transportation in Northern and Central California.

Recommendation: Place a temporary hold on any approval for the River West Investments McKinley Village Proposal until City and State officials determine the final location of the Capitol Railyard.

Conclusion

McKinley Village proposal if approved in its current design would negatively impact several major transportation and development plans including the development of the UP Central City Railyard Infill Project and Arena Entertainment District that are larger in scale than the McKinley Village Project and have not only city but regional impacts.

For the greater good of the city of Sacramento and Northern California I suggest that McKinley Village Project be placed on hold until the new Capitol Railyard location is finalized. Also if the McKinley Village Project is still planned for the current suggested site it must alter its design to allow sufficient land for transportation rail and road expansions and relocation of automobile access to Alhambra Boulevard and Lanett Streets that are designated to handle the increased traffic.

Let me know if you have any questions or if you need further information.

Thank you.

Vito Sgromo

Cell 916 719-1477

No virus found in this message.

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Version: 2014.0.4259 / Virus Database: 3658/6990 - Release Date: 01/09/14

Dana Allen

From: Richard Kitowski <RKitowski@surewest.net>
Sent: Friday, January 10, 2014 2:14 PM
To: Dana Allen
Subject: McKinley Village

Dear Dana Allen,

I am a resident of McKinley Park, 593 36th St. and want to briefly state my views on the proposed development known as McKinley Village.

I am opposed to this development in its current proposed form for the following reasons:

1. I feel that there will be a significant traffic impact on existing well established neighborhoods . The area that will be impacted the most is the area from Elvas Ave and C St. south to H St. and west from Tivoli to the freeway. There can be no doubt that the proposed tunnel under the railroad tracks that will provide ingress and egress to McKinley Village from Elvas Ave at 40th St. and Tivoli will be the main entrance and exit point for the residents of McKinley Village. The proposed ingress and egress at 28th st. will be secondary at best. I feel that there should be another major ingress/egress point for this proposed development. Look at River Park as an example. Carlson Dr. is the main point of entrance and exit for River Park. Carlson does not empty into any neighborhood. It provides access to H St. and to J St. and from those points River Park residents can travel on established thoroughfare type roads.
2. McKinley Village is not an infill project. This is a land locked piece of land that is a levee away from East Sacramento. The size of the development takes it out of the infill category and puts it into a suburban subdivision category. East Sacramento has evolved as a community for about 100 years and that gradual evolvement makes East Sacramento the desirable community that it is today. Communities like East Sacramento cannot be replicated by a single developer. The homes and businesses in East Sacramento have been built by many different contractors over a long span of time. I am thinking that the developers of McKinley Village will prefer to be built out and sold out in about five years time. The final product will be a suburban subdivision! I have no problem with this as it is the developers choice as to the style that they wish to build. I do have a problem with the only proposed access point to this development to be from East Sacramento.
3. Many of the homes in this project will be adjacent to an existing rail line and the Capitol Express freeway. It seems to me that building homes next to noise and air pollution area's(trains and auto's) is not good planning. There should be a significant landscape buffer between the homes and the rail line and freeway.
4. I feel that the site density should be equivalent to that what is most typical for East Sacramento. I believe that the existing project density is greater than , say the home density in McKinley Park.
5. There should be consideration given to a pedestrian, bicycle bridge to provide access to Sutters Landing Park and to the American River.
6. The impact on Theodore Judah School has to be given proper attention.

I urge you to listen carefully to the concerns of the homeowners who will be most affected by this development. If access to McKinley Village was to be from the freeway I doubt there would be much objection to the project. It is the effect that increased traffic will have on a portion of East Sacramento that is the major concern.

Thank You,

Richard Kitowski
593 36th St., Sacramento, CA 95816
916 261 0811

Richard Kitowski,

Dunnigan Realtors
Broker Associate
2401 American River Dr. # 150
Sacramento, CA 95825
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RKitowski@surewest.net
DRE Lic. # 00316682
www.richard4homes.com
www.steps2home.com

DUNNIGAN
Realtors

Dana Allen

From: Nancy Yamada <ntyamada@gmail.com>
Sent: Friday, January 10, 2014 2:29 PM
To: Dana Allen
Subject: McKinley Village Draft Environmental Impact Report (DEIR)

Dana Allen, Associate Planner

City of Sacramento, Community Development Department

300 Richards Blvd., 3rd Floor

Sacramento, CA 95811

dallen@cityofsacramento.org

RE: McKinley Village Draft Environmental Impact Report (DEIR)

Dear Ms. Allen:

As a long-time resident of midtown who enjoys the amenities of midtown, East Sacramento and Sutter's Landing Park, the information the DEIR provides and *fails* to provide greatly concerns me.

No midtown traffic impact analysis: First, and what is glaringly absent from the report is any study on the impact to midtown traffic. Specifically, there is no study of westbound traffic using F and G Streets. I would imagine that many residents of McKinley Village would choose to live there precisely because of its proximity to work downtown and the restaurants/shops in midtown. F and G Streets provide the most direct westbound access to the Central City, but all the lettered streets (H, I, J, K, L, Capitol) would also be impacted. *No* traffic studies of these streets were performed so there is no real understanding of the impacts.

Reported traffic impact analysis troubling: Although I also do not believe that the traffic impacts to C Street have been thoroughly studied, what it does disclose is troubling enough. There are only two access points for cars, a single access point for pedestrians/bikes, no direct freeway access, no direct access to public transportation and no services provided within the development. Basically, it is a gated community. Just looking at the diagram/illustration makes no sense. Car traffic would spill out onto residential streets in East Sacramento and into a park! Ideally, there would be twice as many access points to lessen the impact at all points, and car access at Alhambra Boulevard. Yes, that would be more expensive for the developer, but under the current plan, the residents of the existing neighborhoods will be paying the price instead. In other words, the developer would be profiting at the expense of surrounding residents and others whose enjoyment of their neighborhoods, Sutter's Landing and McKinley Park will be severely diminished.

Detrimental Impact on Sutter's Landing Park: As currently proposed, 1800 cars will exit the project at A Street through Sutter's Landing Park. This will increase noise, pollution, usage, and can only negatively impact the park, all of which would affect the wildlife. The current McKinley Village site offers foraging habitat for the Swainson's Hawks and other raptors that would no longer be available to the American River populations that call this area home. The current proposal doesn't adequately acknowledge the impact to the natural values at

Sutter's Landing. The mitigation efforts currently proposed is miles away rather than adjacent to Sutter's Landing Park, where it could restore some of the natural values that would be lost from the development. Furthermore, there are also safety issues from the increased traffic to pedestrians, bicyclists and skateboarders. There are no sidewalks and a steep grade into and leaving the park.

I have several other issues with this development, but have not had the opportunity to fully examine the voluminous report in regard to those issues. As currently proposed, the McKinley Village project threatens to fundamentally alter the quality of life and character of the surrounding neighborhoods. The proposed McKinley Village will exist as an isolated car-based community that lacks urban-style access to public transportation, shopping and entertainment. Unfortunately, as proposed, the only community connection will be increased car traffic on existing neighborhood roadways.

Thank you for your consideration.

Nancy T. Yamada
605 22nd St
Sacramento, CA 95816
ntyamada@gmail.com

The only thing needed for evil to triumph is for good people to do nothing.
- Edmund Burke (1729-1797) [paraphrased - yes, I even edit famous quotes]

Dana Allen

From: LINDA CARPENTER <lbc52@sbcglobal.net>
Sent: Friday, January 10, 2014 2:30 PM
To: Dana Allen
Cc: Evan Compton; Steve Cohn
Subject: McKinley Village proposal comment

The McKinley Park area is one of Sacramento's loveliest neighborhoods. We have lived here since 1981 and raised our family here. We support infill development and have witnessed proposals beginning with Centrage in the late 80's and culminating with the current McKinley Village project. Our concerns revolve around the impact of additional traffic on our quiet neighborhood streets.

According to the McKinley Village EIR Report and the staff report issued for the Oct.24, 2013 meeting;

- * The 40th Street access route into the development will result in traffic congestion not only on the C St./Elvas route, but throughout our neighborhoods as commuters try to avoid the busiest streets. Westbound traffic will certainly use 39th, 35th, and 33rd streets to reach McKinley Blvd in addition to 40th St. and Alhambra Blvd.
- * Two intersections close to the 40th St. access; 40th St/36th Way and San Antonio/36th Way, are not stop controlled (EIR 4.9-10). Two others; Meister Way/36th Way and Tivoli Way/36th Way are two-way stop controlled, which will result in commute time traffic back-ups as cars flood out to access McKinley Blvd.
- * McKinley Village developers stress the importance of alternative transportation options, and yet just west of Lanatt St. (close to the 40th St. development access route) the two lanes of east-bound C St. widen to four lanes for about 2,000 ft. and for that distance the bicycle lanes end. (EIR 4.9-9, refer also to Figure 4.9-4/Existing Bicycle Facilities, which indicates an intact bike path)
- * Also, the bike/pedestrian undercrossing at the north end of Alhambra Blvd. will be constructed only if approved by UPRR (EIR 4.9-3). If it is not approved, access to public transit and bike lanes will be seriously reduced, resulting in a more car-centric development. This railroad levee also provides secondary flood protection to our neighborhood.
- * Developers indicate easy access to Hwy. 50 via Elvas Ave and 65th St. The transportation and circulation portion of the EIR did not analyze this route. Morning traffic is particularly heavy along Elvas Ave. as St. Francis High School uses it as their main entrance and exit.

Thank you for considering our concerns;

David Carpenter
Linda Carpenter

Dana Allen

From: jeremy lockwood <jeremy.aubrey.lockwood@gmail.com>
Sent: Friday, January 10, 2014 2:36 PM
To: Dana Allen; Steve Hansen; Steve Cohn
Subject: McKinley Village EIR Response

I live near the intersection of 28th and D St. and I am very concerned that the EIR for the proposed McKinley village development has overlooked or whitewashed several major issues.

Traffic: The EIR calls the impact on traffic insignificant. This is not credible based on my experience that it only takes a small amount of congestion at 30th and E streets to cause a backup that floods back several blocks onto McKinley Blvd. given the current traffic pattern. It's hard to imagine that an additional 1800 trips per day would have an insignificant impact. The Development as proposed will be landlocked by transit, hemmed in by freeway and railroad corridors, and the access will be periodically blocked by railroad crossings. This will lead to artificial floods of traffic onto the surrounding surface streets.

Traffic mitigation: Though the expected impact is insignificant the EIR proposes a couple of mitigation efforts. These efforts such as eliminating street parking adjacent essentially transform H St., Alhambra Blvd and McKinley Blvd/E St. into thoroughfares where they are immediately adjacent to the regional McKinley Park. Not only will this negatively impact the park it will negatively impact all of the adjacent properties in the increased traffic and the loss of on street parking. Many of these properties do not have off street parking, and if I were one of those property owners I would see this as more than inconvenience, I would see it as an unreasonable taking for the benefit of a developer.

It is also unclear who is to pay for these mitigations. It appears the need is to be determined after the developers have moved on, and mitigation will become the city's responsibility.

Schools: As you are well aware the district has closed several area schools, while this development can bring an influx of up to 600 schoolchildren. Where will these children attend school and what is the impact to existing schools. Are the existing schools going to be expected to turn away current attendees in favor of these new children?

Land conversion: Much about this project has been described as "infill" I propose that this is not in fact a traditional infill project but instead a suburban agricultural land conversion. Regardless of zoning, this parcel was last used for agricultural purposes. The developers have taken on few of the liabilities associated with an infill project. There is no toxic cleanup, no mitigation of industrial effects that the city has interest in removing.

The Weide Family
334 35th Street
Sacramento, CA 95816

January 10, 2014

Dana Allen,
Associate Planner
City of Sacramento,
Community Development Department,
300 Richards Blvd., Third Floor, Sacramento, California 95811
916.808.2762
dallen@cityofsacramento.org

Subject: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE MCKINLEY VILLAGE PROJECT (P08-086) (SCH No. 2008082049)

Dear Ms. Allen,

Thank you for the opportunity for us to provide comments on the Draft Environmental Impact Report (DEIR) for the McKinley Village Project (proposed project). Here are our comments on the DEIR:

1. ESIA has submitted a **list of changes to the McKinley Village Project**, in response to City and Community Input (12-12-13) (please see attached). Are these changes included in the DEIR Project Description and analyzed in the DEIR? If not, please make necessary revisions to the DEIR to address these project changes.
2. Throughout the DEIR, mitigation measures are shown as recommended. To comply with CEQA, **please differentiate between required and recommended mitigation measures**. If significant project impacts are being reduced to "less than significant with mitigation", the mitigation measures must be required and included in the project commitments. In the mitigation section of the DEIR, please indicate that the mitigation measures must also be incorporated into construction specifications and implemented as part of the project, in compliance with the mitigation Monitoring Plan. Also, please indicate that mitigation implementation must be documented by the city and the construction contractor.
3. Many of the stated **project objectives do not appear to be achieved** as described in the DEIR. The DEIR should explain in detail and quantify how the proposed project will meet developer's stated objectives.
 - The proposed project would increase vehicle miles traveled daily in the neighborhood and surrounding area, resulting in adverse impacts to the quality of life for the residents in the existing McKinley Park neighborhood. How will these impacts be mitigated?
 - The proposed project would not be an opportunity for infill development. According to the City of Sacramento Infill Strategy (5-14-13) (see attached), the proposed

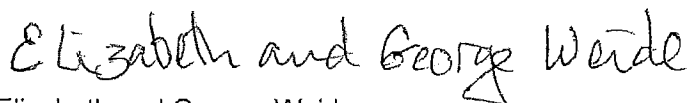
project does not meet City's criteria for an infill project and is not within a City target area for infill. Please explain and provide an infill map that explains how this is a City designated infill area.

- The proposed project is not consistent with sustainable design and low impact development concepts. The proposed homes will be two stories high, requiring higher energy use in the hot summer months. In addition, the homes will have multiple car garages, and the reliance on the car for mobility does not meet the definition of sustainable community. The development will also not be serviced by the local transit agencies. Given these issues, how will the project meet these objectives?
 - At this time, the DEIR does not give enough information to demonstrate that A Street/28th Street is a feasible access location for the proposed project. What approvals will be required to allow the developer to utilize that access location? Will the bridge over the freeway need to be rehabilitated or replaced. If so, who will pay for the rehabilitation or replacement? What is the timeline to be able to utilize the A Street/28th Street access location. If that access location is found to be not feasible, how will the project provide adequate access for vehicular traffic.
 - At \$300,000 to \$700,000, the proposed project would not provide a range of housing. These homes would only be affordable to buyers from the City's higher economic levels.
4. The DEIR states "The general cumulative impact context for evaluating cumulative impacts for the majority of the technical issue areas evaluated in Chapter 4 of this Draft EIR considers development projections identified in the City's 2030 General Plan, or evaluates the potential loss of resources on a much broader, regional scale. *This cumulative impact analyses in this Draft EIR thus do not rely on any list of specific pending, reasonably foreseeable development proposals in the general vicinity of the proposed project.*"

However, **there is no land use section in Chapter 4, and Chapter 3 (Land Use Planning and Population) of the DEIR does not include an analysis of cumulative impacts.** The DEIR should take into consideration the cumulative land use impacts of the pending projects in the proposed project area. These projects include: Planned Sutter Park project; Mercy Hospital expansion project; Sutter General Hospital expansion project; Business I-80 expansion project; and Union Pacific Railroad and CCJPA/Amtrak expansion projects.

Without the cumulative analysis of the proposed project and pending projects in the area, it is not possible to under the cumulative impacts of the proposed project on the existing land uses in the project area. Please provide an analysis of cumulative impacts and proposed mitigation measures to reduce impacts to existing land uses in the project area.

Sincerely,



Elizabeth and George Weide

Partial List of Changes to McKinley Village in Response to City and Community Input as of 12/12/13

Land Use and Homes

1. Reduced number of units from 397 to 336 in response to concerns about neighborhood compatibility and traffic
2. Eliminated the church and pre-school, reducing traffic
3. Expanded single family housing diversity from 3 housing types with 27 base elevations to 5 housing types with 52 base elevations, with a commitment that no two single family homes fronting on the street will look the same taking into account colors and materials
4. Expanded square footage range of homes from 1448-2321 square feet to 1295-3150 square feet
5. Expanded offering of second units/granny flats from 2 home plans to 3 home plans
6. Eliminated 3 car garages on units with granny flats
7. Added plans with master bedroom/bedrooms downstairs
8. Added 24 Parkside Flats units to increase housing diversity, provide a single story living option, create a more urban attached unit design form around the central park, and eliminate elbow lots around the central park
9. Added contemporary home designs – Modern Prairie and Urban Farmhouse
10. Designed specific home plans, not just conceptual renderings of homes
11. Redesigned units along the railroad for noise and vibration to account for existing tracks and potential new Capitol Corridor track. Units now meet city's traditional neighborhood noise standard (stricter than infill standard)
12. Adding new home plans for both the Courtyard and Commons street frontage lots (2 new plans with 6 new elevations) to increase housing diversity on Streets 1 and 8
13. Added setbacks of up to an additional 16 feet to the Commons lots and up to an additional 10 feet to the Courtyards lots in the middle of Streets 1 and 8 to provide setback variation and to provide a greener visual effect when looking down or traveling on streets 4 and 5 from the central park
14. Redesigning 3 home plans to bring the living spaces (great room, kitchen, dining room) to the front of homes to put more eyes on the street and increase neighborhood interaction.
15. Redesigning 2 home plans to pull garages further back from the street
16. Converted homes on one side of Streets 2 and 6 to have alley access, eliminating up to 24 driveways and garages facing the street

17. Committed to pre-plot homes in each phase to ensure diversity of housing plans, elevations, colors, and materials
18. Redesigning fence placements and homes to eliminate yard areas/strips which are difficult to maintain or use
19. Moving fences between homes that are visible from the street further back to enhance the streetscape
20. Included new sustainability features including pre-wiring for electric vehicle chargers

Biking and Walking

21. Added proposed bicycle pedestrian tunnel under the UPRR tracks at Alhambra Boulevard to connect McKinley Village to the McKinley Park neighborhood, retail, Sutter Middle School, and transit and to connect the existing neighborhood to McKinley Village, Sutter's Landing Park and the American River Parkway
22. Increasing the size of the proposed bicycle pedestrian tunnel from a box design that was 12 feet high by 12 feet wide to an arch design that is 12.5 feet high and 25 feet wide, increasing the tunnel size by 70%
23. Proposing to replace standard lighting at the 40th Street underpass and the Alhambra bike pedestrian tunnel with energy efficient LED lighting to provide safety and comfort to pedestrians and bicyclists and to create unique, well designed urban spaces
24. Redesigned entrance to the bicycle pedestrian tunnel to put "eyes on the path" by re-orienting homes and redesigning landscaping
25. Enhanced the bicycle pedestrian path to the tunnel by adding a gazebo and lighted boardwalk across the detention basin
26. Created a direct biking and walking connection from Street 8 to the A Street bridge and the bicycle pedestrian tunnel
27. Added dedicated on-street bicycle lanes and eliminated parking on 40th Street between C Street and A Street and from 28th Street to the A Street bridge to enhance bicycle connections and safety
28. Widened the sidewalk under the 40th Street underpass from 5 feet to 6 feet
29. Redesigning the entrance to the bicycle pedestrian tunnel to include a safe, secure alternative to bollards
30. Reserved a location in northeast corner of the project for a future bikeway connection over the Capital City Freeway to the Two Rivers Trail
31. Proposed sharrows within the project
32. Added traffic calming designs throughout the project including bulb outs, chokers, split medians, and traffic circles to slow traffic, improve biking and walking, and enhance the streetscape
33. Added trees to alleys

Parks and Public Spaces

34. Increased park and recreation center acreage from 1.9 acres to 3.2 acres, with a net increase in public parks of .8 acres despite the reduction in density
35. Included 8 parklets totaling approximately 1 acre to provide common greens and neighborhood gathering places throughout the project
36. Increased overall park and open space (parks, parklets, common greens, landscaped corridors, and detention basins) acreage to approximately 9.5 acres
37. Proposed a community garden in the northeast corner of the project
38. Committed to a voluntary art in public places program to enrich the public realm for residents, visitors, and neighbors
39. Proposing to turf and irrigate approximately 8,300 square feet of the southern detention basin (which is the overflow basin, thus infrequently holding water) to create additional usable park and recreation space
40. Increased tree planting from 1,500 to over 2,000 trees and set out specific planting plans
41. Increased the size of the recreation center to accommodate greater community participation
42. Increased length of the recreation center pool to 75 feet, with six 7 foot lanes so that McKinley Village could participate in local swimming leagues
43. Added additional indoor space, with outdoor patio and gas fire pit, to the recreation center for a café, restaurant, shop or other retail use
44. Proposed specific designs for parks, including activity spaces of benefit to and use by McKinley Village as well as nearby neighborhoods (e.g. pickle ball courts, etc.)
45. Added redwood planting and landscaping on the freeway side of the sound wall/berm along the Capital City Freeway

Other

46. Initiated transfer of property from Twin Rivers Unified School District to Sacramento City Unified School District so children can attend nearest schools and walk or bike to school and so impact fees can benefit local schools
47. Included a sewer storage/surge facility for McKinley Village
48. Working with City to provide a reservation of land to accommodate a potential future City constructed combined sewer system surge tank for the existing neighborhood

Dana Allen

From: Erin Kelly Macko <ekelly1123@hotmail.com>
Sent: Friday, January 10, 2014 2:38 PM
To: Dana Allen
Subject: McKinley Village Project

Dear Ms. Allen,

I agree with the following request made to you on December 19th, 2013 by Physicians for Social Responsibility. The Draft Environmental Impact Report for McKinley Village should expand its scope as the 700 physicians of our communities outline in their letter below.

Physicians for Social Responsibility
10 Dumfries Court
Sacramento, California 95831
www.sacpsr.org • info@sacpsr.org
916 955-6333

December 19, 2013

Dana Allen, Associate Planner, City of Sacramento Community Development
Department 300 Richards Blvd, 3rd Floor Sacramento, California 95811

By e-mail: dallen@cityofsacramento.org

Re: Draft Environmental Impact Report (DEIR) for the McKinley Village project

Dear Ms. Allen:

The DEIR for the McKinley Village project does not adequately address the health impacts for the residents of the proposed project. As stated on page 4 in Section 4.1 (Air Quality and Climate Change), Sacramento County's level of ozone and particulate matter are above attainment levels. Regional air pollution already places our entire community at risk for adverse health effects.

It is well established that proximity to highways is associated with adverse health impacts. According to an August 23, 2012 report by the California Air Resources Board,

Resources Board (CARB)[1], these include: exacerbation of asthma, impaired lung function, increased heart disease, new-onset chronic obstructive pulmonary disease, a faster progression of atherosclerosis, increased risk of premature death from circulatory disease, and increased incidence of new heart disease. Other effects include increased risk of low birth weight and increased risk of preterm delivery for mothers.

Numerous peer-reviewed studies have documented the additional health risks for children living in close proximity to highways. These health impacts include an increase in asthma in children who live within 417 meters (1/4 mile) of a major roadway (as evidenced by higher incidents of wheezing requiring inhaler use and increased hospitalizations).[2] Studies also show that exposure to near-roadway pollutants (independent of regional air pollution levels) add additional risk as evidenced by lowered childhood lung function.[3]

Recent research has also shown that living within 309 meters (0.2 miles) of a freeway during the third trimester, after adjusting for other variables, is associated with an increased risk of having an autistic child.[4]

It is our understanding that the entire project will be located within 417 meters of the freeway and it is anticipated that the closest residence will be 58 feet from the freeway (Appendix C, page 1). CARB recommends avoiding "siting new sensitive land uses within 500 feet of a freeway." [5] This recommendation is acknowledged in the DEIR in Appendix C, p. 10-11.

The best available scientific research indicates that significant health impacts for children can be lessened if they live at least 1370 feet (417 meters) from a major roadway. This information should be considered as this project is being reviewed.

Sincerely,

Harry Wang, MD President, Physicians for Social Responsibility/Sacramento

Sent from my iPad

Dana Allen

From: Beth Campbell <belloq@gmail.com>
Sent: Friday, January 10, 2014 2:42 PM
To: Dana Allen
Cc: Steve Cohn; Steve Hansen
Subject: Response to McKinley Village EIR

I am writing to express my concerns regarding the EIR submitted in response to the proposed development known as McKinley Village.

I am a homeowner near the intersection of 28th and D Streets, and my child attends Theodore Judah Elementary School in McKinley Boulevard. This project will greatly impact my home and family in ways that I feel have not been adequately addressed by the EIR.

Traffic on 28th Street: The EIR barely considers the impact of traffic on 28th Street and does not sufficiently address the concerns of residents in this part of midtown. The railway crossing on 28th Street creates daily delays, including routine stoppages of trains while traffic backs up all the way to D Street and beyond. What mitigation is proposed once this street is handling up to 1,800 additional car trips every day? What mitigation is proposed for this fragile neighborhood (already subject to problems due to the presence of a bar, a gas station, and a freeway onramp) once we become a major commuting route for new residents?

Children (primarily teenagers) as well as local residents routinely walk dogs and ride skateboards and bicycles up 28th Street to access Sutter's Landing park, the dog park, and the skate park. There is no sidewalk and the road is narrow and blind. **What mitigation measures are the developers and the city offering to keep these pedestrians and cyclists safe?**

Traffic on McKinley Boulevard: Last year the Sacramento Unified School District closed the school attended by most children in the part of Midtown to be most affected by traffic at McKinley Village. Kids in New Era Park and parts of Marshall School and Boulevard Park now attend Theodore Judah in East Sacramento, meaning many children walking and biking to school via McKinley Boulevard. This is already a route subject to heavy traffic and aggressive driving during the morning commute time, and it is frankly shocking that no tragedy has occurred so far. The additional traffic envisioned for McKinley Boulevard will make this route even more unsafe. **What mitigation measures are the developers and the city offering to keep these children safe on their way to school?**

Impact on Local Schools: As noted, Midtown's last public elementary school has been closed and Midtown children now attend Theodore Judah Elementary, which will also be the public school closest to McKinley Village. The staff and faculty at Theodore Judah has gone to great lengths to welcome the children from the recently closed Washington Elementary, but the fact remains that Theodore Judah is now at capacity, having to feed children in shifts at lunch time, move school functions off site to accommodate families, and give up office space for after school programs and extracurriculars for classroom space. **Will the recently displaced Washington kids be displaced once again to make room for McKinley Village children? What mitigation measures are the developers and the city and school district offering to ensure that these kids are not once again shunted to another school?**

The EIR answers none of these questions, and while I recognize the need for family housing in the Central City, this development continues to strike me as poorly planned and poorly located. Thank you.

Elizabeth Campbell
2718 D Street
Sacramento, CA

Dana Allen, Associate Planner City of Sacramento
Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

Re: PO8-086
DEIR for McKinley Village Project

The following comments address two aspects of the McKinley "Village" proposed plan. 1st, as designed it is not mixed use; 2nd it is not diverse in housing opportunities.

1st on Mixed Use: A prized feature for many East Sacramento residents is close walk-able proximity to daily retail, dining and transit needs. Some retail and transit access has eroded and is continually missed. Why plan a new "Village" project that does not address basic daily retail, dining, and transit needs? The "Village" as designed does not contribute to convenient access for these needs of new residents or the existing adjacent neighborhoods. The deficit obviously requires increased use of automobiles for multiple daily trips, negatively affecting adjacent neighborhoods. How can this deficit be addressed within the "Village" to provide walk-able access and transit for daily retail including groceries, dining and personal care items?

2nd on Housing: What can be done to further include consideration of housing needs for the disabled and the growing senior population? Adding a unit to an existing home is not an adequate overall solution. Where can multi-family units be included addressing specific needs of the disabled and the senior population?

The City General Plan outlines goals to integrate mixed use and variety in housing types, increase use of public transit, and enhance existing neighborhoods. How, when and where will the City achieve these goals if not in each new project? How will the City achieve these General Plan goals in the McKinley "Village" project?

Thank you for the opportunity to comment,
Rose Luther, East Sacramento resident

Dana Allen

From: Kristin Rapinac <kristin.rapinac@gmail.com>
Sent: Friday, January 10, 2014 2:50 PM
To: Dana Allen
Subject: McKinley Village Draft EIR Comments

Hello,

I would like to submit the following comments on the Draft EIR for the proposed McKinley Village development:

- The draft EIR glaringly neglects to study the full effects of project traffic on the Midtown neighborhoods of New Era Park, Marshall School and Boulevard Park. Despite the fact that the study estimates more than half of McKinley Village vehicles would use the A Street access, only seven intersections and portions of two roadways were studied in this area - compared with twenty-five intersections and ten roadways in East Sacramento. F and G Streets and all numbered streets west of 28th were completely left out of the report, and only a short segment of C Street was included.
- The traffic study fails to demonstrate the traffic patterns of vehicles traveling to employment centers and businesses in Midtown and downtown via streets in New Era Park, Marshall School and Boulevard Park.
- If the suggested half-street closure at 28th and C is implemented, it is important to understand how this would alter traffic patterns.
- The proposal, which offers only two access points -- one of them a very active train crossing -- conflicts with a key residential design principle in the City's General Plan: "Multiple ingress and egress points into subdivisions. This allows for a more even dispersal of traffic through a neighborhood. It also allows for improved emergency vehicle access."
- No comprehensive evaluation of an access point at Alhambra is included in the report, despite many requests from residents and neighborhood associations. Access at Alhambra would resolve many traffic concerns.
- The study's primary focus is whether traffic from the proposed project would cause congestion on area roadways, without taking into account the effect of 3,500+ additional daily vehicle trips on the safety, health and quality of life of residents, pedestrians and bicyclists. The increased traffic from the project would significantly and permanently alter the livability and character of several of Sacramento's signature historic neighborhoods. While this is a qualitative rather than quantitative value, it is a critical consideration.
- The study fails to consider the effects of traffic on Sutter's Landing Regional Park, especially in the years and decades to come. More than half of the vehicles entering and exiting the project will travel through the park. The city plans to develop Sutter's Landing Park as an important regional asset, providing access to the river, recreational opportunities and important wildlife habitat. As the park is further developed, it will attract more and more users, compounding traffic within the park and in the adjacent neighborhoods. The study needs to evaluate how McKinley Village traffic would affect current and future park visitors, how it will impact the Sutter's Landing Park Master Plan, and how increased park use will change traffic flows in the surrounding neighborhoods.

- Safety issues of a potential bicycle tunnel should be fully explored, as these tunnels have proved problematic in the past.

Respectfully,

Kristin Rapinac Graessle

2601 D St.

Sacramento, CA 95816

(207) 210-2178

January 10, 2014

Dana Allen, Associate Planner
City of Sacramento, Community Development Department
300 Richards Blvd., Third Floor,
Sacramento, CA 95811

Dear Ms. Allen,

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the McKinley Village Project (P08-086). I would like to compliment the staff and consultants for the overall readability and generally complete analyses of alternatives, especially given the massive amount of data and complexity of issues. Most, if not all, of comments on the NOP are considered clearly.

My strong preference is for the No Build Alternative for two primary reasons. One: while not so stated in the current General Plan, I believe the city should make preservation of existing natural open space as much a priority as infill near the urban core; in the same way the East Bay park system in the hills provide respite and recreation for residents dealing daily with urban tensions, Sacramento needs to plan for similar respite from what will be increased development. Once developed, open space is gone forever, but it takes considerable vision to protect such land. This parcel could provide an extension of Sutters Landing Park, outdoor education opportunities, or, simply, natural open space. Two, this project does not meet criteria for genuine infill. As others have commented, it is basically a suburban design in a problematic location that, while internally pedestrian and bike-friendly, lacks the connectivity of good urban infill.

However, given that the project is proceeding, I have the following comments:

- I agree with the comments made by ECOS in their letter to you dated January 8, 2014, and the letter from Physicians for Social Responsibility dated December 19, 2013, would like to incorporate those into my comments by reference.
- I particularly would reiterate the ECOS recommendation to require the HOA provide for a shuttle service to the major nearby transit stops for the 30, 34, and 67 buses during peak hours, or to approach RT about extending service, perhaps as a Neighborhood Rides route. The project is currently largely automobile dependent: transit connectivity would make it a far better infill project.
- The Land Use section discusses compatibility with the General Plan and the East Sacramento Community Plan but does not discuss compatibility with the Central City Community Plan; given the projected increase in traffic on local residential streets, that Plan is relevant to the analysis. Also, note that the Neighborhood Preservation Transportation Plan (NPTP) was based on the goals of that plan to restore and maintain the residential nature of the streets, with an overall goal of ensuring livability, and should be acknowledged in the discussion of the half-closures and in consideration of the traffic impacts to C and 28th Streets, which will

see deteriorated traffic conditions contrary to those goals. These goals are in keeping with the maxim of city planning that keeping viable and desirable residential neighborhoods in a central city increases the long-term stability of the urban core, and the General Plan goal to protect and enhance existing neighborhoods.

- Traffic: I appreciate the extensive analysis in the Transportation and Circulation section, particularly of projected cumulative effects, but had questions about the projected traffic on 28th Street and other midtown streets.

The DEIR shows the C to E Street segment carries about 1470 more cars than 28th Street from E to I Streets, presumably because of access to the E Street on-ramp (current midtown residents who wish to travel to downtown would take city streets to the west of 28th).

If the E Street on-ramp is closed, residents from the existing midtown neighborhoods, plus whatever McKinley Village traffic wishes to head north on the Capital City Freeway, would more likely continue to travel to J Street to access that on-ramp, rather than head east on E Street. The impact to the whole of residential 28th Street to J Street would be likely be greater, unless the city takes strong measures to encourage through traffic to move from 28th to 29th Streets.

- As noted above, current residents or workers in midtown/downtown take city streets west of 28th to reach downtown. Given that a selling point of McKinley Village location is that it is close to downtown, one can assume a number of residents will head that direction.

Commuters to downtown jobs from McKinley Village are likely take to take 28th Street to get out of McKinley Village but will then turn onto lettered streets to reach the city core. Increase traffic can be expected on F and H and, particularly, C, G and I Streets, because those three offer straight routes to downtown from 28th Street. The DEIR analysis mentions the potential increase of traffic on those streets as percentages, but for C and I Streets, which already carry a significant traffic load, the percentages could be a tipping point affecting their residential nature. A more explicit analysis of the project's traffic impacts on the streets leading to downtown is needed. (Note: the discussion of cumulative effects to C Street is truly alarming, but I very much appreciate that it was included in this document – while I understand the Sutter's Landing Parkway may be dropped in the future General Plan, these data are very helpful in evaluating it)

- For the same reasons, the analysis should address how increased traffic could affect the safety of vulnerable populations on C and I Streets – specifically, how increases would affect the safety of children walking across C Street to and from Courtyard School and of seniors walking across I and 28th Streets, to and from the Senior Center.
- A half-street closure on 28th Street at C Street should **not** be considered. Although it would divert some traffic from McKinley Village to 29th Street, it would also severely impact C Street, which is also residential and which already carries a high volume of traffic compared to neighboring streets. Other kinds of traffic calming measures that would reduce impacts to

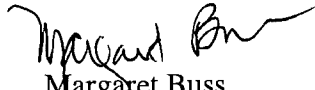
both streets should instead be investigated, including but not limited to signage to encourage 28th Street traffic to use 29th Street.

- ECOS suggested a roundabout at the A Street/Street 1 intersection within McKinley Village to smooth traffic flow and reduce automobile/bicycle/pedestrian conflicts. Are there other places where a roundabout or traffic circle outside the development would serve the same mitigation functions, A & 28th Streets within Sutter's Landing Park or at 28th and C?
- Congestion: The analysis discussed likely congestion on both the north and south sides of the 28th Street railroad crossing due to trains sitting at that location while waiting for their turn to enter the station or travel east. However, air quality and noise effects on nearby residents, as well as on children and adults playing softball or other league games in Stanford Park, should be assessed, as well as the air quality, noise, and effects to both the existing and planned natural values at Sutter's Landing Park.
- Throughout the EIR, the proposed Alhambra bicycle/pedestrian tunnel is cited as a very important part of this project's livability and its qualification as a good infill project. However, as the EIR consistently notes, UP has not yet agreed to the tunnel, nor is there any discussion of a timeline for that approval (or disapproval). The final EIR should address all relevant effects should UP deny a permit for a tunnel at this point, including addressing the project's relative value as infill.
- If used only as a bike/pedestrian tunnel, the developer and city should have enhanced safety features on the Alhambra side of the tunnel, such as convex mirrors (the kind often used on blind corners) showing the area outside the tunnel.. While the tunnel and immediate entrances may be well-lighted, the real danger for a pedestrian is potential threats hidden from view.
- The EIR states that the tunnel must be at least 12 feet wide to accommodate city maintenance vehicles and to allow emergency vehicles another point of access to the development. If the tunnel is approved, would it be possible for the developer to pursue design exceptions for normal street width or widen the tunnel slightly to provide a sidewalk, so that the tunnel could also be used as a one-lane access point, with traffic signals dictating directional flow through the tunnel? Having a third access point for automobile traffic would alleviate some of the traffic volume at 28th Street and at 40th Street, at least in commute hours. Bicycles could still use the tunnel, and, if a sidewalk is included, pedestrians.
- Last, but definitely not least: the Public Services and Recreation section mentions Sutter's Landing Park (SLP) as a regional park (p.4.7-11) but is not mentioned at all in Section 4.7-4 (p.4.7-29), which should include an analysis of the project's potential to cause deterioration of existing parks. SLP is, in fact, the closest park to the development and the one most affected by the development. Aside from a rather dismissive comment elsewhere in the EIR that the wildlife of the park are used to ambient noise and urban uses so would not be affected by the new development, there is no good discussion here (or elsewhere) of the effect on SLP and its particular values, which includes not only the recreational facilities but

its function as gateway to the riverine habitat and natural setting on the south side of the American River. (Note that this Park has a strong constituency in groups such as Friends of the River Banks, which sponsors monthly nature education programs in the park, Friends of Sutter's Landing Park, Friends of Swainson's Hawk, and Friends of the American River have long-standing concerns about the SLP losing its natural values to hardscaped facilities). The EIR should address how the influx of a minimum of 1800 automobiles a day at the park entrance affects the particular values of the Park.

Thank you again for the opportunity to comment on the DEIR. While I oppose the development, and notwithstanding the comments above, I very much appreciate the work that went into the analyses in the document and look forward to seeing concerns addressed.

Sincerely,



Margaret Buss
711 22nd Street
Sacramento, CA 95816
(916) 448-6246

Cc: Steve Hansen, City Council; Steve Cohn, City Council; Boulevard Park Neighborhood Association

Dana Allen

From: Gary Brill-Lehn <ggbrillehn@gmail.com>
Sent: Friday, January 10, 2014 3:16 PM
To: Dana Allen
Subject: Response to DEIR for McKinley Village proposed development

These are responses from Gary and Susan Brill-Lehn, 609 -40th Street, Sacramento, to the Draft EIR for McKinley Village. Thank you for including ours in the body of responses received from our many East Sacramento neighbors who are concerned about this proposed development.

We do not feel that there has been adequate analysis of both direct and indirect impacts of the proposed project (including all future phases and reasonably foreseeable facilities necessary to support the project) in the Draft EIR as is discussed below:

The Draft EIR (section 4.7 states that the impact of adding 144 elementary students [to Theodore Judah] is "less than significant". This analysis is based on the student generation and capacity figures from Sacramento City Unified District staff but fails to address all aspects of the issue. We note that the said school district is quoted in SCUSD August 1, 2013 Board Meeting Response to Public Comment in response to the question: **"Are these sites able to handle the increased capacity within the development's timeframe?"** Their response states that: **"assigning the students to Theodore Judah could create the need for additional capacity triggering Division of State Architect modifications. A transition plan would need to be developed to include, but not limited to, a plan for interim housing during renovation, community outreach and funding."** Capacity is only based on number of school rooms and does not consider the impact on ancillary school services. Already the old cafeteria is unable on some days to process current student through lunch in a timely manner and may need to be modified to accommodate increased volume of children. Theodore Judah houses after-school programs that may need to be closed due to new students. This will significantly impact working families in the local area who cannot drop work in order to get to school at 2pm. The above-referenced modifications may be very significant and costly if they require retrofitting.

With respect to the Alhambra Blvd alternative entrance/exit, we feel that there was i adequate independent review by analysts beyond the project proponent and ask the City to include a comprehensive analysis of this alternative by objective experts:

Moving the entrance/exit away from narrow streets in the heart of a small neighborhood and onto a major thoroughfare would go a long way toward increasing acceptability of the McKinley Village project.

With respect to the proposed mitigation suggested by the DEIR to add a dedicated right turn lane on Alhambra toward McKinley Blvd, we are very concerned that it will further limit the number of parking spaces for the McKinley Library, Clunie Clubhouse, McKinley Pool and the McKinley Park playing fields and playground.

This is a major regional park and needs to have adequate parking. Due to bus route set asides, church set asides, and other special requirements, we end up with almost no adequate parking now. If the dedicated right turn lane reduces the spaces further at a time when more users will be coming on

board from McKinley Village and other development projects in the area, the City's investment in its facilities at McKinley Park will be seriously short-changed.

We do NOT feel that a street light at 33rd St. and McKinley Blvd is advisable. If the traffic analysis numbers are accurate, that intersection is and will be a low LOS and it does not warrant the traffic light

Dana Allen

From: TIM DAVIS <t.davis@me.com>
Sent: Friday, January 10, 2014 3:20 PM
To: Dana Allen
Cc: Steve Cohn; Steve Hansen; Mayor Johnson; Angelique Ashby; Allen Warren; Jay Schenirer; Kevin McCarty; Darrell Fong; Bonnie Pannell
Subject: Draft Environmental Impact Report (DEIR) for the McKinley Village project

Dear Ms. Allen,

I am writing because I have grave concerns regarding the Draft Environmental Impact Report for the proposed "McKinley Village" project. I feel that it does not adequately address and inaccurately addresses, the significant impacts on the existing neighborhoods with increased traffic, noise and air pollution, and an overburdening of the nearby schools. I also feel the project is an ill-conceived design with increased house density, lack of public transportation, as well as flood and air pollution issues. And, it is not consistent in design with the surrounding neighborhoods. I feel it would be irresponsible for the city to approve this project as is proposed... this is not Smart Growth, this is suburban sprawl!

The proposed project does little to promote a sense of community as its an isolated location completely surrounded by the highway and railroad levees, it does not protect the integrity and vitality of the surrounding neighborhoods. McKinley Village Project will create adverse side-effects to the existing Midtown and East Sacramento communities by forcing higher levels of car travel on the local road system, increasing traffic on already crowded neighborhood streets (and adding the air, noise, and safety impacts that come with an increase in traffic), as well as placing an additional burden on existing public services, especially related to neighborhood schools.

Also, I agree with the following request made to you on December 19th, 2013 by Physicians for Social Responsibility. The Draft Environmental Impact Report for McKinley Village should expand its scope as the 700 physicians of our communities outline in their letter below:

Physicians for Social Responsibility
10 Dumfries Court
Sacramento, California 95831
www.sacpsr.org • info@sacpsr.org
916 955-6333

December 19, 2013

Dana Allen, Associate Planner, City of Sacramento Community Development Department
300 Richards Blvd, 3rd Floor
Sacramento, California 95811

By e-mail: dallen@cityofsacramento.org

Re: Draft Environmental Impact Report (DEIR) for the McKinley Village project

Dear Ms. Allen:

The DEIR for the McKinley Village project does not adequately address the health impacts for the residents of the proposed project. As stated on page 4.1-5 in Section 4.1 (Air Quality and Climate Change), Sacramento County's levels of ozone and particulate matter are above attainment levels. Regional air pollution already places our entire community at risk for adverse health effects.

It is well established that proximity to highways is associated with adverse health impacts. According to an August 23, 2012 report by the California Air Resources Board (CARB)[1], these include: exacerbation of asthma, impaired lung function, increased heart disease, new-onset chronic obstructive pulmonary disease, a faster progression of atherosclerosis, increased risk of premature death from circulatory disease, and increased incidence of new heart disease. Other effects include increased risk of low birth weight and increased risk of preterm delivery for mothers.

Numerous peer-reviewed studies have documented the additional health risks for children living in close proximity to highways.

These health impacts include an increase in asthma in children who live within 417 meters (1/4 mile) of a major roadway (as evidenced by higher incidents of wheezing requiring inhaler use and increased hospitalizations).[2] Studies also show that exposure to near-roadway pollutants (independent of regional air pollution levels) add additional risk as evidenced by lowered childhood lung function.[3]

Recent research has also shown that living within 309 meters (0.2 miles) of a freeway during the third trimester, after adjusting for other variables, is associated with an increased risk of having an autistic child.[4]

It is our understanding that the entire project will be located within 417 meters of the freeway and it is anticipated that the closest residence will be 58 feet from the freeway (Appendix C, page 1). CARB recommends avoiding "siting new sensitive land uses within 500 feet of a freeway." [5] This recommendation is acknowledged in the DEIR in Appendix C, p. 10-11.

The best available scientific research indicates that significant health impacts for children can be lessened if they live at least 1370 feet (417 meters) from a major roadway. This information should be considered as this project is being reviewed.
Sincerely,

Harry Wang, MDPresident, Physicians for Social Responsibility/Sacramento

[1] California Environmental Protection Air Resources Board. Status of research on potential mitigation concepts to reduce exposure to nearby traffic pollution, August 23, 2012, p. 2-3.

[2] Brown MS, Sarnat SE, DeMuth KA, Brown LA, Whitlock DR, Brown SW, Tolbert PE, Fitzpatrick AM. Residential proximity to a major roadway is associated with features of asthma control in children. PLoS One. 2012;7(5):e37044. doi: 10.1371/journal.pone.0037044. Epub 2012 May 17.

[3] Urman R, McConnell R, Islam T, Avol EL, Lurmann FW, Vora H, Linn WS, Rappaport EB, Gilliland FD, Gauderman WJ. Associations of children's lung function with ambient air pollution: joint effects of regional and near-roadway pollutants. Thorax. 2013 Nov 19. doi: 10.1136/thoraxjnl-2012-203159.

[4] Volk HE, Hertz-Picciotto I, Delwiche L, Lurmann F, McConnell R. Residential proximity to freeways and autism in the CHARGE study. Environ Health Perspect. 2011 Jun;119(6):873-7. doi: 10.1289/ehp.1002835. Epub 2010 Dec 13.

[5] California Environmental Protection Agency California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005, p. 10.

Sincerely,

Tim Davis
423 Santa Ynez Way
Sacramento, Ca 95816

Tim Davis Creative

Phone: (916) 737-1433 • Cell: (916) 747-5855

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January 10, 2014

Ms. Dana Allen, Associate Planner
City of Sacramento, Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, California 95811

RE: McKinley Village DEIR Comments

Dear Ms. Allen:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the McKinley Village project.

The DEIR does not adequately or objectively address the impact McKinley Village traffic will have on the surrounding neighborhoods, and instead only studies the Level of Service (LOS) from the driver's experience. As McKinley Village will utilize only narrow neighborhood streets for vehicle ingress and egress instead of major existing arteries such as Lanatt/Elvas and Alhambra, the project is inappropriately reliant on narrow streets which will create unsafe conditions for the children and residents.

While I have provided more precise comments below, I also wish to express my support for the comments submitted by Tina Cerruti and the Neighbors United for Smart Growth group.

Chapter Four – Section 9 Transportation and Circulation

Figure 4.9-7 Claims neither Tivoli, nor McKinley Blvd between 40th and Meister will realize *any* of the McKinley Village *inbound* traffic. Given the lack of retail located within McKinley Village -- and the proximity of these streets to Compton's Market – as well as the close proximity of this area to Theodore Judah Elementary, I question whether these figures can possibly be correct and ask them to be restudied.

I also call into question the claim that A Street will carry 52% of the inbound trip distribution, especially given the volume of trains that cross over 28th Street. I believe residents will develop a pattern of not using the 28th Street location and therefore favor 40th Street access. The DEIR does not study patterns of drivers who have a choice to cross over busy railroad crossing versus alternative access that is not blocked by railroads. I ask that this be studied and addressed.

Figure 4.9-8 Claims neither Tivoli, nor McKinley Blvd between 40th and Meister will realize *any* of the McKinley Village *outbound* traffic. Given the lack of retail located within McKinley Village -- and the proximity of these streets to Compton's Market – as well as the close proximity of this area to Theodore Judah Elementary, I question whether these figures can possibly be correct and ask them to be restudied.

I believe residents will develop a pattern of not using the 28th Street location and therefore favor 40th Street access. The DEIR does not study patterns of drivers who have a choice to cross over busy railroad crossing versus alternative access that is not blocked by railroads. I ask that this be studied and addressed.

When comparing Figure 4.9-6 Peak Hour Traffic Volumes (Existing) and Figure 4.9-9 Peak Hour Traffic Volumes and Lane Configurations – Existing Plus Project Conditions it displays that the McKinley Village project will generate *no* additional car trips on Tivoli, nor McKinley Blvd between 40th and Meister, even during peak times (however, in Table 4.9-9 it displays an increase from 1,500 to 1,502 Average Daily Traffic). It is not realistic -- especially given the close proximity of McKinley Village to Theodore Judah Elementary and Compton's Market – that a project of this magnitude will have variably no impact to these areas. This should be readdressed.

Merced Underpass

The utilization of existing major arteries for the McKinley Village project is too important to the surrounding neighbors for the City of Sacramento to ignore. In fact, there is an opportunity for the McKinley Village developer to pursue an underpass at Alhambra at a cost that is much lower than their current estimates. Attached is a recent underpass project completed in Merced. We request that the City of Sacramento work to find a way as to how a similar approach could be applied to McKinley Village, specifically at the Alhambra location.

As a steering committee member of Neighbors United for Smart Growth, I am forwarding this Merced underpass project information on their behalf.

Again, Dana, thank you for the opportunity to provide comments.

Sincerely,

Rob Finley
4026 McKinley Blvd
Sacramento, CA 95819

Attachments

DEIR Cover
BCA Award Info
BCA RR Underpass Info
G Street Photos
Unaltered BCA webpage

- Special Inspections

G Street / BNSF Underpass • Merced, CA



The G Street Underpass, which is 145 feet long, carries two sets of tracks over four lanes of depressed roadway traffic (six lanes of future traffic.) An extremely tight vertical clearance and the desire to minimize the roadway depression required the use of a precast concrete box beam bridge type. The entire structure was constructed in stages to permit continual BNSF and Amtrak traffic. In a very cost-effective arrangement, Biggs Cardosa Associates formed an integrated construction management team with the City's forces. The scope of work included reviewing contractor submittals (concrete mix designs, rebar shop drawings, prestressing tensioning reports, calculations, etc), assisting with preparation of bridge contract change orders, response to bridge RFI's, and on-site Structure Representation during the construction of the bridge and other miscellaneous structures. BCA also inspected all bridge-related work (field verification of contractor generated bridge survey information, coordination of pile driving inspection with a subconsultant, precast concrete section placement, welding, reinforcement, formwork and concrete placement), and performed material sampling and testing.

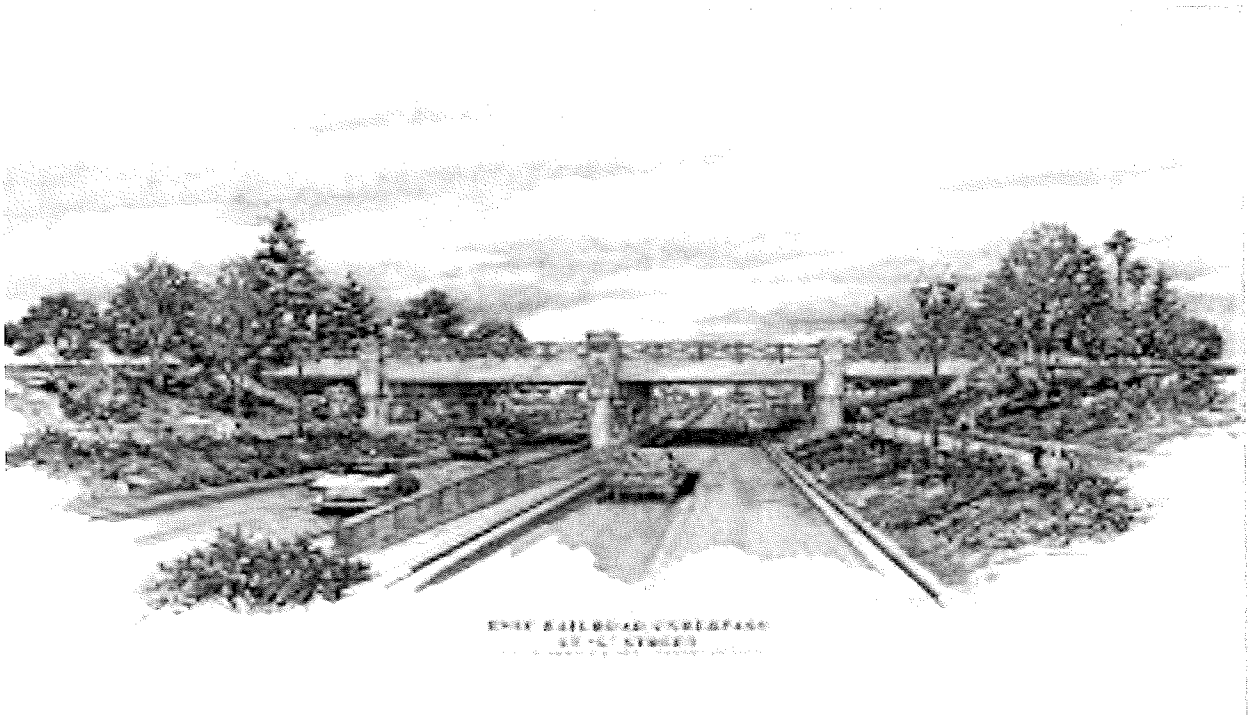


Construction



Completed

POTENTIAL FOR A RAILROAD UNDERPASS AT ALHAMBRA BOULEVARD



Neighbors United
for Smart Growth

Introduction

This information was prepared by Neighbors United For Smart Growth, an East Sacramento and Midtown group of citizens and residents, who believe that the vehicular access to the proposed McKinley Village project would better serve the existing as well as new neighborhoods if it were constructed at Alhambra Boulevard.

This packet contains information on a relative new and innovative method of constructing a roadway beneath an existing active railway without the traditional use of a shoofly. This method of construction allows trains to continue operation on existing track while construction of a vehicle underpass is completed.

In 2011 this method was developed and used to build an underpass in the city of Merced at an at grade crossing. The Engineering was done by Biggs Cardosa and Associates (BCA) and commissioned by the City of Merced who worked closely with BNSF Railroad and the engineering firm to get the project completed under budget and ahead of schedule.

The first page in the packet is a description of the Merced project from the BCA website. This is followed by a summary of the project as described in an California Engineering Excellence Award received by BCA in 2012 for their work on the project. The details of the Merced project, in the form of BCA's application for the award, follows. A similar project using the same method is now being started in Stockton.

The developer of McKinley Village has stated that the cost of building a shoofly over Interstate 80 is prohibitive and the reason that Alhambra Boulevard is not possible. We think that this newly developed option of foregoing a shoofly and building a vehicle underpass beneath an active railway has not been thoroughly vetted or explored. We have talked with both the lead engineer from BCA on the Merced project as well as the project manager from the City of Merced. From these conversations we have concluded that it is entirely possible to create a vehicle access at Alhambra without a shoofly of interruption of rail traffic.

These materials are provided to spur exploration and discussion of alternatives to the 40th Street access and demonstrate the logistic and financial feasibility of a much more logical access at Alhambra Boulevard.

Please direct questions or further inquiry to nusg.sacramento@gmail.com

Contents

- Brief Description of Merced G Street Underpass Project From The Biggs Cardosa Associates Inc. (BCA) Webpage
- 2012 Engineering Excellence Award Received by BCA for the Merced G Street Project
- Description of The Collaborative and Innovative Construction of the Merced G Street Railroad Undercrossing described in the BCA Engineering Award Application
- Photographs of the project provided by John C. Sagin, Jr. AIA, Principal Architect, City of Merced
- Contact List of Principals Involved in the Project

Contact List

Neighbors United For Smart Growth

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City of Merced

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saginj@cityofmerced.org

David Gonzalves, Development Services Director: 209-385-6818

gonzalvesd@cityofmerced.org

Biggs Cardosa Associates

Richard Sanguinetti, Lead Engineer 559-449-8686 X 4106

rsanguinetti@biggscardosa.com

Burlington Northern Santa Fe Railroad

John Stilley, BNSF Public Projects Manager 909-386-4474

A. ROLE OF THE ENTRANT'S FIRM IN THE PROJECT

Prime Consultant and Structural Engineer

B. ROLES OF OTHER CONSULTANTS PARTICIPATING IN THE PROJECT

- BNSF Railway Company—Contractor (underpass bridge)
- Teichert Construction—Contractor (completion of bridge, roadway, stormwater, utilities)
- BKF Engineers—Civil Engineer
- HDR—Rail design
- Parikh Consultants—Geotechnical Engineer
- Zeiger Engineers—Lighting
- Heacox Associates—Landscape Architect
- Bender Rosenthal—Right-of-way appraisals and negotiations

C. BRIEF DESCRIPTION OF THE ENTRANT'S CONTRIBUTION TO THE PROJECT

Overall Project Description

In the city of Merced, long freight trains created frequent and significant traffic congestion and delays for automobiles, especially during peak-hour traffic. The city's three major cross-town roadways all had signal-controlled, at-grade crossings of the Burlington Northern and Santa Fe Railway Company (BNSF) line. This heavily used rail line carries 12 Amtrak trains and up to 70 freight trains a day. Because the community hospital is on the other side of the rail lines from the majority of the city's population, emergency medical crews transporting patients and on-call doctors rushing to the hospital frequently encountered delays caused by trains. Police and firefighting teams also routinely faced delays. In 1931, this particular crossing was the infamous site of an accident involving a school bus and a freight train that resulted in the death of 6 schoolchildren. This accident was the catalyst that led to the law that all school buses must stop at railroad crossings.

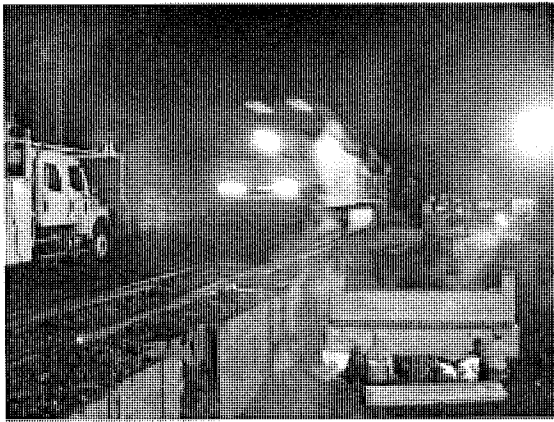


To improve safety, reduce traffic congestion, and provide a reliable route for the City's emergency services, the City obtained grant funding from the California Proposition 1B Highway-Railroad Crossing Safety Account (HRCSA) to create its first grade separation at the intersection of the BNSF line and G Street. An underpass was the most economical and least disruptive solution due to its smaller footprint. Rather than build a temporary at-grade railroad crossing (shoofly) for the construction period, the team chose to stage-construct the underpass within several hours-long construction windows with uninterrupted live railroad traffic. Pile driving occurred during the day, taking advantage of very short windows and repeatedly swinging the pile driver out of the way of approaching trains. Construction of the main portions of the underpass; the girders, the bent caps and the track, occurred for the most part on weekend nights, with BNSF shutting down one of the two tracks for a period of 12 to 16 hours.

In order to expedite approval and construct the project under live railroad traffic without impacting BNSF operations, the City took the bold and unorthodox decision to contract the construction of the bridge directly with BNSF's construction division. Biggs Cardosa Associates (BCA) designed the bridge and worked with BNSF's construction crews in a design-build arrangement to conform to BNSF's construction techniques, available supplies, and equipment.

The BNSF Railroad Underpass at G Street carries a main track, a siding track, and a maintenance road over four lanes of depressed roadway traffic (six lanes of future traffic). The 145-foot long bridge consists of four precast concrete box beam simple spans. The substructure consists of precast concrete abutments and bent caps, steel piles, and cast-in-place concrete pier walls.

Original or Innovative Application of New or Existing Techniques



Construction of the underpass without a shoofly

At the outset, BCA and the team investigated a variety of options for constructing the underpass. In a typical project of this kind, a shoofly is built to direct trains around the construction zone to avoid affecting railroad operations, but in this case, the intersection's proximity to the newly built Amtrak station and recently installed train switch made that option exceedingly expensive. Building a shoofly would have added an additional \$6 million to the project, temporary platforms at the Amtrak station, and an additional

temporary (and potentially dangerous) track crossing for Amtrak passengers. The City would also have had to acquire the land to place the shoofly, an expensive proposition that would also have disrupted the back yards of nearby residents.

BCA worked with BNSF to identify an alternate solution: construct the bridge under live railroad traffic without the use of a shoofly, using short one-day closures of one track at a time on weekend nights. The bridge is supported by driven steel piles that facilitated top-down construction. The driven piles performed double duty. They provided temporary bridge support during excavation of the depressed roadway, and became part of the permanent concrete substructure. The use of precast girders, bent caps, abutment caps, and wingwalls all contributed to expediting the construction schedule of the bridge. After the piles were driven, BNSF crews essentially built a one-track bridge in 12 to 16 hours. Within this window, they removed a portion of the track, excavated to within a couple of feet from the top of the piles, placed the bent and abutment caps, welded them to the piles, placed the precast girders, reinstalled the ballast and replaced the removed section of track.

“This was a really creative solution for the trains and the automobile traffic. BCA helped us show the City Council and the public that this was the best solution, and that it was in the best interest of everybody to close the road and build the bridge under live tracks. They cut 15 months off the project and saved millions of dollars. This teamwork was the reason that this project came in on time and on budget. Now everybody's happy.”

—David Gonzalves, Development Services Director, City of Merced

Use of Railroad Company as Contractor

Typically, railroad companies design and construct their own bridges, but it is highly unusual for a railroad to serve as a contractor for a bridge designed by a consultant for a local agency. BCA involved BNSF extensively from the start to ensure the process would go smoothly. BCA analyzed previous examples of BNSF's underpass designs and made sure that the G Street Underpass relied on the materials and standards that the railroad company typically used. Construction of all other elements, including the roadway, storm water utilities and associated sidewalks, were performed by the City's contractor, Teichert Construction.

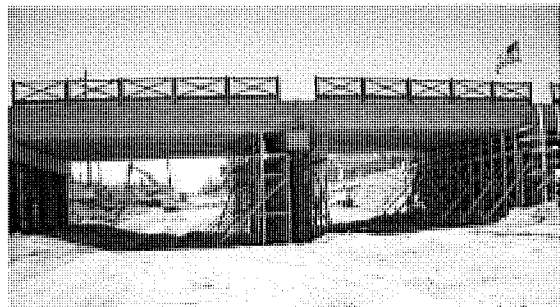
Using BNSF as the Contractor gave the railroad company the necessary level of comfort that their operations would not be impacted by constructing the bridge under live railroad traffic, and was instrumental in gaining BNSF's approval of this unusual construction methodology. It also enabled BCA to design shoring systems closer to live tracks than required by BNSF's specifications. This was a critical condition to the feasibility of the proposed system.

"BCA was able to use one of our standard bridge designs with standard span lengths and materials. Had they designed a fresh bridge that didn't draw on the standards that we use, we wouldn't have had the right frames, and we wouldn't have had the availability of materials. This way, we could get everything built really quickly. BCA was great to work with. They had a good design, they worked with our people to use what we could easily install, and they were out there to make sure that it was all done according to plan."

—John Stilley, Manager, Public Projects, BNSF Railway Company

Top-down construction

BCA designed the underpass to enable the shortest construction period possible by employing top-down construction, which minimizes the amount of excavation during the construction of the bridge. By excavating only enough soil to place the bridge girders, an adjacent live rail track is able to stay open without an expensive, tall shoring system. Once BNSF completed their portion of the underpass, the City's contractor, Teichert Construction dug underneath, completed the sub structure and created a four-lane roadway, bicycle lane/shoulders and sidewalks. With the rail traffic on the bridge above, Teichert Construction was freely able to complete the remaining project construction without disrupting rail traffic.



Future Value to the Engineering Profession

The project advances a positive public image of engineering excellence by demonstrating how creative engineering solutions can significantly enhance public health and safety in a timely and highly cost-effective fashion, resulting in an aesthetically appealing undercrossing.

"At first, many members of the public were against the project because of the disruption that construction would cause, but once they saw how well it was going, once they saw that it's on time and on budget, even with the months of heavy rain we had during construction, everyone became excited about it."

—David Gonzalves, Development Services Director, City of Merced

“We had never done anything like this before in the city of Merced—no one had any experience doing an undercrossing—and it has come out beautifully and works extremely well. This is going to be one of the nicest undercrossings in the area. There's nothing like this in the San Joaquin Valley. Most of the other undercrossings are very stark and ugly—this one is going to be beautiful.”

—*John Sagin, Project Manager, City of Merced*

Social, Economic, and Sustainable Design Considerations

Before the construction of this grade separation, local public safety officials estimated that a total of two hours of emergency vehicle response time were lost to rail traffic delays each day. The grade separation significantly reduces response time for emergency providers, including ambulances, fire protection, medical first responders, and police services.

The grade separation improves air quality in the San Joaquin Valley air basin by eliminating automobile traffic backups due to train delays, significantly reducing carbon emissions. The City estimated that the grade separation would eliminate 1,369 pounds per year of PM10, CO2, and NOx caused by idling vehicles waiting on the trains. Train horn use during all hours of the day and night can be much less frequent because of the elimination of the at-grade crossing.

The City is also incorporating local art into the project to create additional aesthetic appeal and ward off graffiti. The City selected two local artists to decorate the underpass upon completion, with murals depicting the city as well as a walkway and a series of ceramic tiles featuring local landmarks and images of California.

Complexity

BCA facilitated frequent meetings early in the project, bringing together the City, BNSF, and other entities as necessary. These meetings were crucial to the project's success. Coordination with PG&E and AT&T was also essential, because in order for pile driving to occur, these two utilities needed to temporarily relocate high voltage power lines and banks of fiber optic lines away from G Street in time for the start of construction. In the case of PG&E, G Street is a major power transmission corridor, and the lines had to be moved during the summer, when energy use is at its peak. Both utilities moved their lines in time for construction to begin on schedule, a very tall order given the complexity of the relocations and the extremely accelerated schedule. BCA and the City jointly coordinated the relocation design and the construction with PG&E and AT&T.

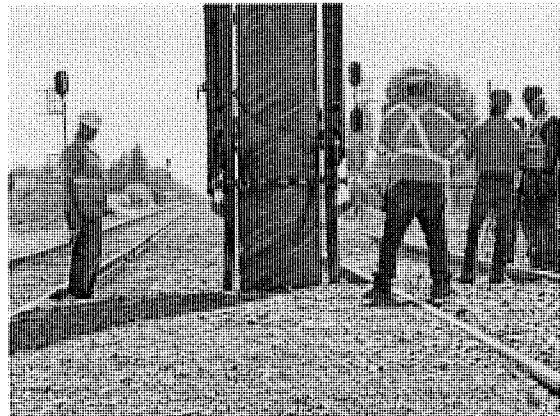
Extensive public outreach was required. The City put together a task force, the “G” Street/BNSF Railroad Undercrossing Citizens' Advisory Ad-Hoc Committee, to meet with City staff to share information, garner public input, gather comments and ideas on specific design aspects (such as road connections, traffic control, and aesthetics) and on traffic reduction/calming strategies, and bring input from the committee to the City's design and consultant team. The committee included residents from the surrounding neighborhood and representatives from local businesses, schools, and the citizenry at large. The advisory committee met multiple times and provided comments on topics such as pedestrian safety, infrastructure design, property rights, and neighborhood compatibility. BCA incorporated extensive input from the advisory committee.

The adjacent Ragsdale community, originally a vocal opponent to the project, turned into a project supporter through their involvement in the ad-hoc committee.



The project involved building three bridges: one for the main track, one for the siding track, and one for BNSF's maintenance road. During construction, BNSF shut down one track at a time and transferred all trains to the adjacent track for a period of 12 to 16 hours, usually at night on weekends. The piles were driven between oncoming trains. During a 2-hour interval between trains, the crane would swing into place, drive a pile between the rails, and then swing out of the way in time for the next train to pass. Safety considerations were crucial for a

construction project that had to take place during the night, when visibility is poor and workers must avoid fatigue while functioning against their biological clocks. Lighting equipment was required to illuminate the construction site. The work had to follow not only OSHA regulations but also Federal Railroad Administration safety regulations, which are stricter than those associated with general construction. Piles were driven in the intervals between passing trains, which required extensive care to ensure safety of crew and equipment, especially important given that the trains traveled past at speeds of up to 65 miles per hour.



“Since we are the railroad operator and the track owner, but we were not designing the bridge, there were times when issues arose that we didn’t have the answer to. What really helped smooth the process was that my supervisor on the ground had close contact with the engineers on the ground as well as the City. Having everyone there on site together to resolve issues was very beneficial. It certainly shortened the process a lot. We could communicate much more effectively to resolve issues in a timely manner and adjust plans and the design as necessary based on what we encountered in the field. I thought that worked really well.”

—Stephen Hedemann, Structures Supervisor, BNSF Railway Construction

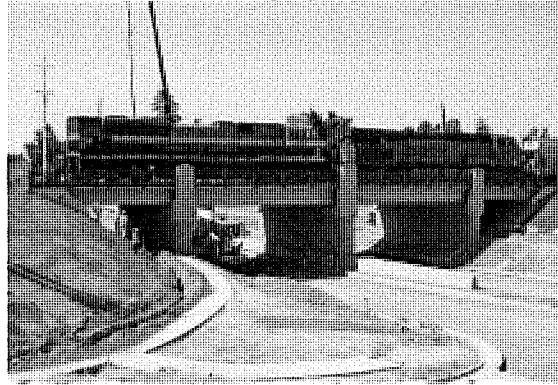
Exceeding Client/Owner Needs

BCA engaged with the City of Merced and with BNSF extensively throughout the project, identifying a number of options with cost estimates and incorporating extensive public input. One of the most noteworthy achievements on this project was the design team’s adherence to an extremely aggressive schedule. When BCA was given Notice to Proceed with the project in May 2008, only a very rough concept existed. In June 2010, the project was awarded for construction. Within those 26 months, the design team filed a Statutory Exemption from CEQA, completed a feasibility study and PS&E, coordinated the relocation of multiple utilities, participated in

community outreach efforts, and supported the City's efforts to acquire six full parcels and several partial takes and award an early demolition contract to clear the right-of-way. Although the project was likely the least advanced project approved for funding under Prop 1B's HRCSA program, it was the first project to be constructed under the program.

The California Transportation Commission had approved an \$18 million project, so keeping the project within that budget was of utmost importance. The project came in within that budget, including engineering, construction costs, and property acquisition. It is exceedingly rare to construct a grade separation of this complexity for less than twice that amount.

Total project budgeted cost: \$18 million
Total project actual cost: \$12.5 million
Entrant's portion of the budgeted cost: \$18 million
Entrant's portion of the actual cost: \$12.5 million



Scheduled and actual date of completion: Construction began on July 19, 2010. The underpass was completed in October of 2010. The roadway is on schedule to be complete by the end of October 2011, in advance of the anticipated completion date of December 2011.

"BCA was exceptional. They worked evenings, weekends, and nights, whenever we needed them, because of the need to get this project done on time. They bent over backwards and made sure that we got whoever we needed and whatever answers we needed to move this project forward. With all projects, revisions come up, and BCA's response time was absolutely excellent. In addition to their design, which worked out great, their response to our needs and the needs of the community was excellent."

—John Sagin, Project Manager, City of Merced

"Michael Thomas and Richard Sanguinetti sat down with us from the beginning and worked through the environmental impacts and the design. They took our input instead of having their own preconceived ideas, and they truly listened to the public. The result was that we had an easier time designing and selling the project to our community. The principals were out there under that bridge at 3:00 in the morning with us, enabling us to complete the work necessary during the windows of time that the railroad company gave us. That says a lot."

—David Gonzalves, Development Services Director, City of Merced

"For a grade separation project to go from concept through feasibility study, environmental clearance, final design engineering, utility relocation, right-of-way acquisition, and construction in about three-and-a-half years is unheard of in California these days. These projects usually take 10 years or more to come to fruition. I have never worked with a public agency as visionary, aggressive about keeping to their schedule, and goal-oriented as the City of Merced. Dave Gonzalves, John Sagin, Bill King and so many others at the City are who made this project possible within this time frame. Any time an obstacle arose, they would all scramble to solve it. Dave would not accept anything that would delay the project, and where others would shy away from political fallout, he pushed relentlessly. This project is the best example I know of a true partnership between the public and the private sector in delivering a project."

—Michael Thomas, Project Manager, Biggs Cardosa Associates

ACEC California 2012 Engineering Excellence Awards Honor Award

Biggs Cardosa Associates, Inc. BNSF Railroad Grade Separation at G Street - Merced, California

City of Merced
 Merced, CA
 Client/Owner

BNSF Railway Company
 Contractor
 (underpass bridge)

Teichert Construction
 Contractor
 (roadway, stormwater
 and utilities)

Biggs Cardosa Associates
 Prime Consultant and
 Structural Engineer

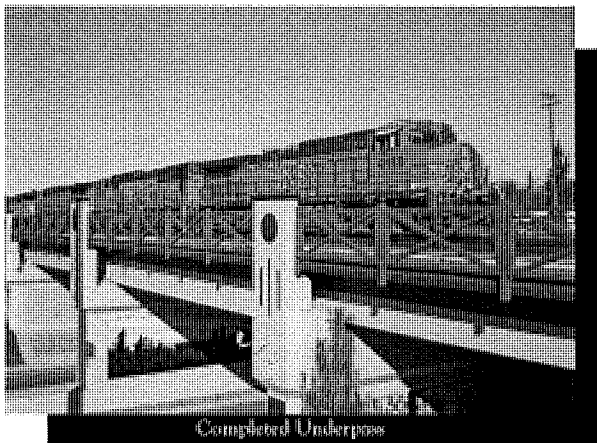
BKF Engineers
 Civil Engineer

HDR
 Rail Engineer

Parikh Consultants
 Geotechnical Engineer

Zeiger Engineers
 Electrical Engineer

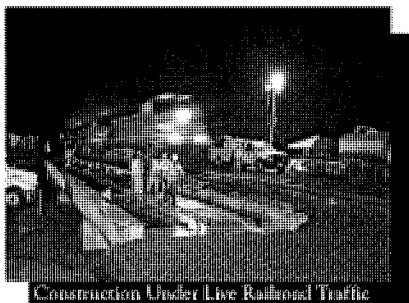
Heacox Associates
 Landscape Architect



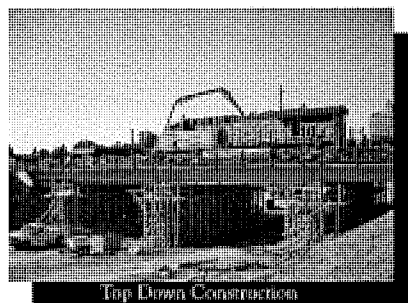
Completed Underpass



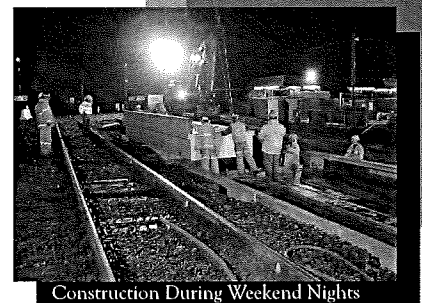
Completed Grade Separation At Night



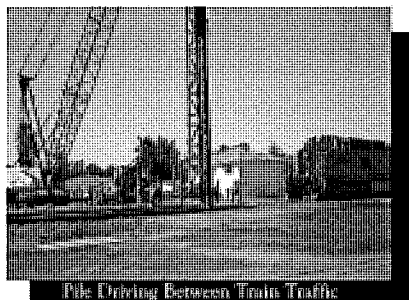
Construction Under Live Railroad Traffic



The Lower Construction



Construction During Weekend Nights



Pile Driving Between Train Traffic

In the city of Merced, long freight trains created frequent and significant traffic congestion and delays for automobiles, especially during peak hour traffic. The city's three major cross-town roadways all had signal-controlled, at-grade crossings of the Burlington Northern and Santa Fe Railway Company (BNSF) line, which carries 12 Amtrak trains and up to 70 freight trains a day. To improve public safety, reduce traffic congestion, and provide a reliable route for the city's emergency services, the City decided to create its first grade separation at the intersection of the BNSF line and G Street.

The BNSF Railroad Underpass at G Street carries two tracks and a maintenance road over four lanes of depressed roadway traffic (six lanes of future traffic). BCA collaborated with BNSF in a design-build arrangement to design and construct the 145-foot-long underpass beneath live railroad traffic, a much more economical and less disruptive solution than building a railroad shoofly during construction. BCA designed the bridge, and BNSF constructed the bridge mostly on weekend nights, with 12 to 16 hour temporary closures of one track at the time. Another noteworthy achievement was the delivery team's cooperation and adherence to an extremely aggressive schedule. In a little over three years, the City/BCA/BNSF/Teichert team completed a feasibility study, complied with CEQA, completed PS&E, relocated utilities, participated in community outreach efforts, acquired the necessary right-of-way, and completed construction.



January 9, 2014

TO: Dana Allen, Associate Planner
City of Sacramento Community Development Department
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

FROM: Susan Brank
290 San Antonio Way
Sacramento, CA 95819

SUBJECT: Comments on Draft Environmental Impact Report for
McKinley Village project proposal (P08-806)

I am writing as a resident of East Sacramento (36 years), a retired executive manager of the CA Board of Registered Nursing (20+ years), a volunteer teaching assistant at Theodore Judah Elementary School (7 years), and a mentor of underprivileged and foster children (7 years).

I am highly committed to public health and safety, particularly for children. Also, I strongly back the need for neighborhood livability and quality of life.

Following are my comments on the DEIR.

Lack of accessibility of DEIR document to the public.

The average member of the public would have an extremely difficult time accessing and commenting on the DEIR. It is hundreds of pages long and available in a fragmented manner on the City's website. It was difficult to locate and even more difficult to move from one section to another due to the need to open each section separately. Groups that advocate for neighbors were only provided with one copy for review.

Many citations in the DEIR were not attached for review. It was impossible to fully evaluate the DEIR without making the source documents for the citations part of the public record. Open government requires that such emails, memoranda, telephone notes, and other documents be included for review.

With such difficult access, there was a chilling effect on public review and comment.

McKinley Village is not a true infill project.

When the City's General Plan was developed and SACOG advocated for area planning, it is unfathomable to think that a proposal such as McKinley Village was intended.

It is simply wrong to place 328 families in a small pocket that is immediately surrounded by a high-volume freeway and railway lines. It is a good goal to make housing available near downtown to reduce pollution generated by long commutes. But that should not be achieved at the expense of families who are housed directly beside freeway and railroad lines with air and noise pollution!

Sacramento already has a high rate of asthma (15.5% per California Breathing of CA Department of Public Health, reference at end of this document). It has been established in numerous studies that the closer people live to freeways, the higher the incidence of asthma and other respiratory diseases. (See attached citations and studies by Breathe California, University of Southern California, and other research listings at end of this document.)

Oddly, the DEIR does not even mention possible potential respiratory diseases like asthma. Instead, it only refers strictly to cancer risk. Why isn't the City concerned about public health diseases and illnesses that greatly affect quality and longevity of lives, as well as affecting the cost of health care?

Reduction of car trips should be a primary goal of an infill project. McKinley Village is completely car-centric. There are no stores or services within the project, no mass transit, and only two access points in and out (making trips to services longer). The "village" is not a complete neighborhood, and it is not well-connected to adjacent areas.

Infill should include a variety of housing. This project consists of 328 stand-alone houses, with the possibility of adding a few condos.

Infill should be "right-sized" houses. This project's houses are huge, 4-5 bedroom houses with multiple-car garages, encouraging lifestyles that use excess space and waste resources.

"Persons per household" assumption is incorrect, leading to faulty conclusions.

If the wrong figure is used for the expected number of persons per household (PPH), then several conclusions fall apart. For example, the number of car trips, the incidence of cancer, the need for public services, the number of people impacted by noise and pollution, as well as other parts of the DEIR depend significantly on the PPH.

City staff used 2.0 persons per household as the assumed number. The report states that there will be 656 people living in the 328 houses. This cannot possibly be correct.

Looking at the evidence within the DEIR itself, internal inconsistencies prove that 2.0 PPH is not plausible. The best example comes from the estimated number of children from McKinley Village who will attend school.

Page 4.7-24 states that 230 – 258 students would come from McKinley Village. Let's assume the number of students is in the middle of that range: 244 students. Then the households might consist of some of the following combinations:

- 244 houses with one student and a single parent, and 84 houses with a couple with no children. That would mean 74% of the households had single parents.
- 244 houses with one student and two parents, and 84 households with only one occupant.

Neither of those options, or the infinite number of other combinations, are plausible. With houses having 4-5 bedrooms and a total of 230 – 258 children who are students, it is impossible to believe that the 2.0 persons per household measure is remotely correct.

Further proof that the DEIR's estimated PPH is way off the mark is the fact that the **most recent U.S. Census Data puts Sacramento's PPH at 2.7** for single family dwellings. (This is

consistent with Sacramento Area Council of Governments' and the City's Park Planning and Development' PPH figure as of June 27, 2013, pursuant to the City's Quimby Code formula.)

The PPH figure needs to be corrected throughout the report, resulting in a higher number of potential car trips, a higher cancer incidence rate (due to more people being affected), a greater need for public services, etc.

Problems accommodating McKinley Village students in schools.

The DEIR fails to identify fundamental problems that realistically will occur if 230 – 258 students are added to the Sacramento City Unified School District schools that are closest to the project.

In particular, based on my 7 years as a volunteer at Theodore Judah Elementary School, I am aware that adding 131 – 144 students to the school would be a monumental undertaking and would create a disruptive environment for all of the students. It would undermine the ability to provide an effective educational environment. That number of additional students simply cannot be absorbed in existing buildings.

The DEIR fails to include the text of at least two key citations in the appendices. The citations are a memorandum and an email. Without these documents, it is impossible to evaluate and adequately challenge the DEIR's conclusions about the impact of McKinley Village on schools. These documents should have been part of the public record.

The City needs to carefully question the accuracy and applicability of Table 4.7-2 which states that Theodore Judah can expand from its current enrollment of 581 to a capacity of 859. The context of the 859 capacity figure is not likely to be applicable in this case. The 859 capacity figure is not realistic when referring to an immediate addition of up to 144 students from the Village project.

Theodore Judah's campus is a historic registry site, making modifications to any structures on the campus especially complicated. The campus consists of the original oldest structure, which is supplemented with a number of modular classroom buildings. The cafeteria, auditorium, and other common spaces used by all students are likely not to be able to accommodate such a large number of students.

If more students are added, it would necessitate eliminating some programs that use rooms that are dedicated to the program. Examples include: Science, Speech Therapy, Classrooms for students with disabilities, Library, Music, and other programs. Parents and the neighborhood have worked diligently to establish these programs that are essential to a successful school. Elimination of key programs would destroy the upward achievements of the school across the past few years.

Reductions of the space for these specialized uses would have the greatest adverse effect on the most vulnerable students who are in need of specialized education and intervention, such as children who have physical, mental, or learning disabilities. Elimination of programs would also have a greater adverse impact on children who come from disadvantaged homes (as defined by the free and reduce-cost lunch programs). More than most children, these disadvantaged children rely on the library and computer lab and other special program access to meet needs that cannot be met at home.

Due to the District's budgeting process and the school's historic registry designation, it is not possible to simply install new modular classrooms for immediate expansion. It is also not a legal option to simply add more students to each existing classroom because of student/teacher ratios. (Classes for kindergarten cannot exceed 32 students, First through Third classes are 31 students, and Fourth through Sixth are 33 students.)

Public health and safety issues would be significant if such a large number of students are forced to be enrolled in a campus that cannot expand rapidly enough to smoothly incorporate the new students. Overcrowding, stress, and less individualized attention will most likely result in more illnesses, absences, and behavioral problems.

Mitigation would be essential if Theodore Judah is expected to absorb such a large number of new students. It would be necessary for the developer to work closely with SCUSD to offer funding and services to facilitate expansion. Private funding from the developer should be expected in order to arrive at solutions to maintain all of the school's programs, to hire architects and contractors to resolve the problem of lack of campus space for expansion, and perhaps funding for a school nurse and other personnel to ensure a successful transition.

Ongoing mitigation should be required of the developer to provide funding for school buses to transport children to and from Theodore Judah. Without buses, parents would have to drive approximately 144 children to and from school, adding 576 car trips via small residential streets. (It would not be safe to expect elementary school children to walk or ride bicycles through the tunnel under the railroad tracks.)

Traffic impacts to East Sacramento are not accurately portrayed.

Every aspect of the traffic counts are suspect because of my personal observation of fundamental flaws in the methodology.

On my street (San Antonio Way), traffic counts were conducted in July 2013 when school was not in session. A large proportion of traffic on this street is due to school traffic from September to mid-June. When this was brought to the City's attention, a new count was conducted in early October. There was a big problem. On that day, our road was CLOSED with official signs blocking the roadway due to road construction for meter installation.

In another case of flawed traffic study methodology, on San Antonio Way a traffic counter strip was laid across the street roughly halfway down the block between McKinley and 36th. This occurred after it was brought to the City's attention that one count happened while school was out of session and another count when the street was closed due to road construction. The fundamental flaw with the counter strip was its placement which caused it to fail to capture the majority of school traffic. Parents commonly park on the portion of San Antonio Way closest to McKinley Blvd. to pick up and drop off their children. When they depart, they make a U-turn and do not travel beyond the first half of San Antonio Way. Therefore, they did not go across the traffic counter strip on the day it was in place.

All of the traffic counts surrounding Theodore Judah Elementary School need to be re-examined to determine whether 1.) school was in session, and 2.) road construction was disrupting the usual flow of traffic. Also, major thoroughfares that were excluded from the traffic study need to be added.

Did the traffic study use any “extrapolations” to arrive at projected numbers for traffic counts? If so, those locations need to be identified for the public. Such methodology for this neighborhood is dubious at best. Patterns of traffic vary widely at each intersection depending on the flow of school traffic, time of day, and weather conditions. No counts at one intersection or road should be applied to another location.

The projected number of vehicle trips due to the new development needs to be recalculated in light of a corrected number of Persons per Household (PPH) and in light of an inordinate need to travel due to lack of services within the new “village.”

“Level of Service” (LOS) criteria are NOT sufficient measures of traffic impact.

City traffic studies typically find “less than significant” impacts because the definitions are car-centric and do not consider the impact on pedestrian, bicyclists, children, and residents. “Level of Service” merely refers to issues such as wait time at an intersection, traffic flow, and speed. By adding stop signs and/or traffic lights, the additional onslaught of traffic is considered magically mitigated because traffic is moving.

The City needs to evaluate other factors! Traffic that will be generated by this project will significantly increase the number of cars and trucks on narrow residential streets and will alter the residential character. Even San Mateo County takes these factors into consideration in addition to the basic LOS criterion.

The City needs to factor in the impact of the additional vehicle traffic on existing neighborhoods whose roads are not large enough to accommodate the new traffic. The additional air pollution from exhaust, vehicle noise, risk to pedestrians and bikers (especially children), and reduced quality of life for residents must be considered.

Two major factors will cause McKinley Village to generate more traffic than other new or existing neighborhoods.

First, the “village” has only two ways in and out of the neighborhood, thereby funneling and condensing the traffic at two key junctures. That intensifies the amount of traffic unfairly at two small existing neighborhood locations!

Second, McKinley Village will have no services like grocery stores or restaurants. (There is a possibility of a small commercial space, but the developer has stated that the neighborhood is too small to make support of services viable.) Without any internal services, extra vehicle trips will be essential, even for small items like bread and milk.

An Alhambra Blvd. access point must be added.

As described above, traffic in and out of the proposed McKinley Village is funneled and concentrated into only two access points. Both of these exits drop traffic onto small residential streets and into neighborhoods that are not constructed to handle the likely 3,000+ car trips per day. The funnel effect is likely to fall more onto the 40th Street egress because residents will avoid the exit that might be blocked by train traffic.

Besides creating an adverse impact on existing small neighborhoods, the limit to only two exits could be a critical safety issue in the event of emergencies such as train derailment, gas leaks, flooding, or other problems that could require quick evacuation of the village. Also, emergency vehicle access to the village would be restricted to only two access points.

In fairness to the existing neighborhoods and new residents of the "village," a more logical access point needs to be added at Alhambra Boulevard. Unlimited advantages could be listed for such an addition. New residents could more easily exit to go to McKinley Park, stores, the freeway, downtown, and other destinations without having to wind their way through small residential streets.

The cost of adding an Alhambra Blvd. access point is irrelevant in the bigger picture of what makes sense for decades to come.

Air quality evaluation fails to comply with current research and standards.

As described in a prior section, it is simply wrong to place 328 families in a small pocket that is immediately surrounded by a high-volume freeway and railway lines. It is a good goal to make housing available near downtown to reduce pollution generated by long commutes. But that should not be achieved at the expense of families who are housed directly beside freeway and railroad lines with air and noise pollution!

Sacramento already has a high rate of asthma (15.5% per California Breathing of CA Department of Public Health, reference at end of this document). It has been established in numerous studies that the closer people live to freeways, the higher the incidence of asthma and other respiratory diseases. (See attached citations and studies by Breathe California, University of Southern California, and other research listings at end of this document.)

Oddly, the DEIR does not even mention possible potential respiratory diseases like asthma. Instead, it only refers strictly to cancer risk. Why isn't the City concerned about public health diseases and illnesses that greatly affect quality and longevity of lives, as well as affecting the cost of health care?

HEPA filters in each home's HVAC systems will not help when families are outside. Children will be playing in yards and pools that are extremely close to air pollution including particulate matter and harmful chemicals. The developer touts parks, recreational areas, and inviting yards for barbeques. But should the new residents be spending any time outside in light of their proximity to pollutants?

Attempts to mitigate the pollution are futile. Trees will take a decade to begin to mature and reach a size that they will begin to make a small dent in the pollution. In the meantime, traffic on I-80 will continue to increase, with a logjam of traffic that situates idling vehicles spewing emissions right next to the new neighborhood. Also, railway traffic should increase in the future as our population and demand for goods increases.

Noise pollution for residents of the Village is not addressed properly in the DEIR.

One of the strangest quotes from the DEIR that was provided by the noise consultant was "Perception of the loudness of noise" depends on a number of factors. Certainly, anyone who

has walked along the area that is intended to become McKinley Village can attest to the fact that no perception filter is needed: It is simply extremely loud at the site.

Train whistles blow throughout the night, trains' wheels screech loudly at the curve in the tracks as they scrape metal-to-metal, the incessant roar of traffic from I-80 is maddening, and you must shout loudly to a walking partner to be heard over this din of noise.

Mitigation of train noise is nearly impossible. The level of the tracks is roughly at the level of the roof-line of the houses. No sound barrier can block the train noise.

Mitigation of the freeway noise might be dampened slightly by sound walls. But it will still be continually present, especially on the second level of homes.

It is difficult to imagine how residents could possibly have outdoor barbecues or backyard gatherings with the high noise level.

Air and noise pollution for existing neighborhoods during construction not addressed adequately.

The DEIR states that project construction will have a significant impact in July 2014 when site grading and construction of the 40th Street underpass plus the 40th Street extension overlap.

What will be the route for construction vehicles? What requirements will be in place to halt construction on days that are high pollution days for Sacramento? How will the developer keep down billowing clouds of dust while grading and preparing the site? (Recently, I saw construction underway at Curtis Park Village, and the dust cloud was at least eight stories high and was so thick it obliterated the view.)

Those of us in the neighborhood who have asthma need to know what to expect during construction. Construction will be staged across a few years, creating a long period in which our quality of life is dramatically impacted. In fact, illnesses may result from the particulate matter and diesel fumes that will affect respiratory health. Also, public health officials need to be consulted about the possibility of Valley Fever spores being released from the site.

Construction will be the key time when an Alhambra Blvd. access point would be critical.

The secondary levee at 40th Street should NOT be punched to create a tunnel.

If access to McKinley Village was available via Alhambra Blvd, there would be no need to create a tunnel under the rail tracks at 40th Street.

Even though the levee for the railroad tracks is a secondary one, it does provide some protection for East Sacramento from flooding. In the event of a primary levee breach, this secondary levee would provide a few extra hours for residents to evacuate. Why would the City want to allow the tunnel to be punched through that key point in the secondary levee in light of that information?

Summary

Thank you for taking into consideration my feedback on the DEIR. You can see that I have given careful consideration to many aspects of the proposed development.

I do not think that this development would be good for the City as a whole, for the residents of the proposed development, or for the residents of existing, adjacent neighborhoods.

Sincerely,

Susan Brank
290 San Antonio Way
Sacramento, CA 95819

Attachments

Comments on DEIR, McKinley Village



909 12th Street
Sacramento, CA 95814
Phone: (916)444-5900 or 1-877-3BREATHE
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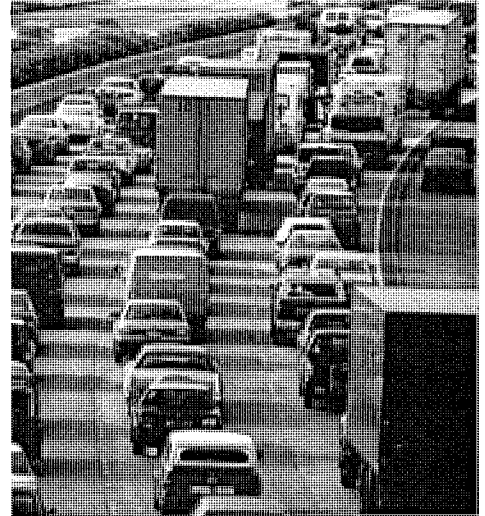
Local Health Impact Studies

Health Effects Task Force Studies 1995-2009

We have completed work on eight local studies on air pollution in collaboration with UC Davis, Kaiser Permanente, California Department of Health Services, California Air Resources Board (CARB), and California Office of Environmental Health Hazard Assessment, with funding from Sacramento Metropolitan Air Quality Management District and Yolo-Solano Air Quality Management District.

May 2009 Thomas A. Cahill and David E. Barnes, UC Davis DELTA Group:
Comparison of Fine Mass, UC Davis DRUM versus FRM, at the ARB 13 th and T Street Site

This one year side by side monitoring study, sanctioned by the California Air Resources Board at its 13th and T Street site, compares mass data collected by the UC Davis rotating drum impactor (8 DRUM) with ARB's standard mass monitoring measurements. The study showed that the 8 DRUM monitor proved to be a cost effective way to obtain important additional data for health and regulatory needs while being accurately comparable to the ARB's mass measurements currently required by law. In particular, this study introduces vital new information about ultrafine particulate matter which studies now show is capable of deep lung deposition, and heart and brain impacts.



April 2008 T. A. Cahill PhD, UC Davis:

Removal Rates of Particulate Matter onto Vegetation as a Function of Particle Size

Conducted at the University of California, Davis, this wind tunnel study showed that all forms of evergreen vegetation were able to remove 30% to 80% of very fine particles at wind velocities below roughly two miles per hour during the 2 to 4 seconds in which the particles were within the vegetation chamber. Redwood and deodar were about twice as effective as live oak. The success of this study has led to one to begin January 2009 that will compare protective qualities of evergreen vegetation downwind and adjacent to Highway I-5 in Sacramento as compared to unprotected sites also downwind of I-5. [Click here](#) to read a one page summary of the report.

2007 T.A. Cahill, PhD, UC Davis and T.M Cahill, ASU:

Air Quality at Roseville Railyard Poses Cancer Risk : Recent Study by Health Effects Task Force Also Outlines Multiple Solutions

This study was conducted in collaboration with the Placer County Air Pollution Control District (PCAPCD) and its Roseville Railyard Aerosol Monitoring Project (RRAMP). The study report consists of seven components all of which bear on monitoring emissions from the Railyard in Roseville. Some components were funded by EPA Region IX in a grant to PCAPCD and some were collected by Dr. Cahill as a volunteer with Breathe California of Sacramento-Emigrant Trails (BCSET) and the Health Effects Task Force (HETF). This study is the first of its kind to analyze the chemical content of the highly toxic ultrafine particulates in locomotive diesel at the railyard. A key study finding revealed that the locomotive diesel exhaust from the Roseville Railyard is about 5.5.times richer in the most carcinogenic components of diesel exhaust (benzo[a]pyrene, among others) than is the exhaust from diesel trucks. A chapter of this report is dedicated to recommendations for mitigation of emissions at the Roseville Railyard.

There has been substantial media coverage of the health impacts of exposure to diesel pollution in and around the Roseville Rail Yards. It is important, however, to appreciate that, as stated in the Sacramento Bee article, the predicted increase in lifetime cancer rate from the Air Resource's Boards 2004 analysis was 1 part on 1,000 or less for the vast majority of local residents. Other impacts, such as increases in asthma, are harder to predict but can certainly occur.

Nevertheless, there are actions you can take to better protect your health:

- Install filters in your heating and cooling systems – passive electrostatic filters appear to be a good choice;
- Be extra vigilant in keeping your filters clean and change them more frequently;
- Avoid tracking dirt inside and open windows away from the diesel pollution source;
- Minimize your time spent outdoors in situations in which you observe diesel smoke is present,
- Next spring, plant a row of vegetation with thick foliage as a barrier which may be effective to absorb diesel smoke. Good evergreen choices might be deodars, cedars, redwoods, and interior live oaks. More studies are being done on the most effective vegetation barriers and results should be available soon.

Other mitigations are being implemented within the rail yard itself by Union Pacific Rail Road as per an agreement with Placer County and other agencies, and the report on their progress is currently scheduled for release next Spring. .

2006 T.A. Cahill, PhD, UC Davis:

Vehicular Particulate Exposures and Potential Mitigations Downwind of Watt Avenue, Sacramento, California

This third and final phase of a series of studies conducted by Dr. Cahill for Breathe California of Sacramento-Emigrant Trails focused on air quality impacts from traffic on Watt Avenue which confirmed previous findings that very fine and ultrafine particulates substantially impacted Arden Middle School immediately downwind of Watt Avenue at Arden Way. A new section in this report addresses mitigation opportunities for those who reside downwind of heavily trafficked urban corridors such as Watt Avenue. This report also emphasizes that although the California Air Resources Board has declared diesel particulates toxic to human health (California Almanac 2006), no health protection standards have been established by the California Air Resources Board or the Environmental Protection Agency for the very fine and ultrafine particulates found in diesel exhaust. This study received guidance and support from Arden Middle School and San Juan Unified School District personnel and county departments.

2005 T.A. Cahill, PhD, UC Davis:

Sacramento/Interstate 5 Transect Study, Phase II, Winter Months

This second phase examined the impacts of secondary roadways carrying predominantly car traffic. On Watt Avenue, diesel trucks, although they represented only about 1.5 percent of all vehicles, contributed about 1/3 of all the very fine and ultrafine particulates, while cars contributed 2/3 of the very fine and ultrafine particulates, which substantially impacted Arden Middle School.

2003 T. A. Cahill, PhD, UC Davis:

Sacramento/Interstate 5 Aerosol Transect Study

This study measured air pollution levels at nine sites upwind and downwind of Highway I-5 and east to the foothills. The level of diesel/smoking gasoline vehicle impacts was larger at Arden Middle School directly downwind of Watt Avenue than at the Crocker Art Museum directly downwind of Highway I-5, despite lower traffic flows on Watt Avenue. Very fine particulates traveled well away from freeways and filled large areas of downtown Sacramento.

2003 California Air Resources Board:

Short Term Study of Outdoor Air Quality at Two Sacramento Schools on Watt Avenue

This limited study provided some insight into the air quality of the two schools, Arden Middle School and Frederick C. Joyce Elementary, but showed that the overall Sacramento region had a stronger influence over the air quality of the schools than the local sources of air pollution. Diesel particulate was not measured as part of this study because no methods to measure diesel particulate were available to CARB at the time the study was conducted.

2003 Study in collaboration with Michael Lipsett, MD, OEHHA on MediCal youth with asthma in the Sacramento Region:

Air Pollution and Exacerbation of Pediatric Asthma in Sacramento

Specific to the Sacramento Region, this study demonstrated a link between SMOG and childhood asthma attacks resulting in hospitalizations and emergency room visits. This study has not been released for publication.

2002 Study in collaboration with Steve Van Den Eeden, PhD, Kaiser Permanente:

"Particulate Air Pollution and Morbidity in the California Central Valley"

This study found strong and consistent air pollution effects between particulate matter and acute and chronic respiratory hospitalizations among Kaiser Permanente members, 60 percent of whom lived in the Sacramento Region.

1998 Study in collaboration with T.A. Cahill, PhD, UC Davis:

"Comparison of Cardiac and Stroke Mortality to Carbon Monoxide, Ozone, and Particulate Air Pollution Concentrations in the Sacramento Valley Region"

This study compared CA Dept. of Health Services mortality data to CARB air pollution data, suggesting a statistically strong link between PM 10 and increased mortality from ischemic heart disease, with weaker evidence for heart attacks and strokes and ozone air pollution.

To receive any additional information regarding these studies and/or the Health Effects Task Force, please contact Betty at (916) 444-5900 ext. 211 or email bturner@sacbreathe.org.

Health Effects Task Force

The Health Effects Task Force (HETF) is a group of air quality and health experts who for over a decade have volunteered to leverage their skills and expertise to further locally based studies on the health impacts of air pollution in Sacramento and the Central Valley of California. This is an area with known and serious air pollution problems that differ significantly in type from other extensively studied areas in California and the nation.

HETF has been chaired since its inception by Jananne Sharpless, past chairwoman of the California Air Resources Board, with members drawn from organizations such as the Cal EPA/ARB, Kaiser Permanente, California Office of Environmental Health Hazard Assessment, University of California, Davis, Sacramento County Health Department, and local research companies, among others.

Local air districts have funded the work of HETF with modest grants for over ten years with results only achievable because of the dedication of this extraordinary group of volunteers.

Eight studies specific to this region have been completed identifying:

- How strategically placed vegetation downwind of busy roadways can remove ultrafine particulates from the air, thereby protecting the health of residents,
- Effects of air pollution on mortality rates from ischemic heart disease and stroke in the Central Valley,
- Particulate air pollution and rate of hospitalizations;
- Increased hospitalizations and emergency room visits of MediCal youth with asthma during high ozone days; and
- Three studies on exposure to ultrafine particulates across Sacramento and at a school site directly downwind of a densely trafficked urban corridor.

Other studies in progress include: a ten year study looking at air pollution effects on the elderly; high school students conducting on campus indoor and outdoor air quality assessments at regional high school sites; a study on the health protection effect of vegetation and downwind barriers on very fine and ultrafine particulates from freeways; and a one year comparative study of data captured by the Cahill 8 drum sampler and the California Air Resources Board monitor at the 13th and T Streets site in Sacramento.

Childhood Asthma Linked to Freeway Pollution

09/21/05

By studying air pollution levels in 10 Southern California cities, USC investigators show that proximity to freeways poses a respiratory risk.

By Alicia Di Rado

“These results suggest that tailpipe pollutants from freeway traffic are a significant risk factor for asthma,” said lead author James Gauderman, associate professor of preventive medicine in the Keck School.

Living near a freeway may mean more than the annoying rumble of cars and trucks: For children, it brings an increased risk of asthma, according to researchers in the Keck School of Medicine of USC.

Scientists studying air pollution levels in 10 Southern California cities found that the closer children live to a freeway, the greater their chance of having been diagnosed with asthma. The findings are reported in the November issue of the journal *Epidemiology*.

Researchers also found that children who had higher levels of nitrogen dioxide, or NO₂, in the air around their homes were more likely to have developed asthma. NO₂ is a product of pollutants emitted from combustion engines, such as those in cars and trucks.

“These results suggest that tailpipe pollutants from freeway traffic are a significant risk factor for asthma,” said lead author James Gauderman, associate professor of preventive medicine in the Keck School. “Considering the enormous costs associated with childhood asthma, today’s public policy toward regulating pollutants may merit some re-evaluation.”

“These results have both scientific and public health implications,” said David A. Schwartz, director of the National Institute of Environmental Health Sciences, the federal agency that funded the study. “They strengthen an emerging body of evidence that air pollution can cause asthma and that exposure to outdoor levels of nitrogen dioxide and other traffic-related air pollutants may be a significant risk factor for this illness.”

Researchers looked at the pollution-asthma link in 208 children who were part of the USC-led Children’s Health Study, the longest investigation ever into air pollution and kids’ health. The study has tracked the respiratory health of children in a group of Southern California cities since 1993.

The investigators placed air samplers outside the home of each student to measure NO₂ levels. In addition, they determined the distance of each child’s home from local freeways, as well as how many vehicles traveled within 150 meters (about 164 yards) of the child’s home. Finally, they estimated traffic-related air pollution levels at each child’s home, using models that take weather conditions, vehicle counts and other important factors into account.

In all, 31 children (15 percent) had asthma. Scientists found a link between asthma prevalence in the children and NO₂ levels at their homes.

For each increase of 5.7 parts per billion in average NO₂ – which represents a typical range from low- to high-pollution levels among Southern California cities – the risk of asthma increased by 83 percent. Risk of wheezing and current asthma medication use also rose as NO₂ levels increased.

The scientists also found that the closer the students lived to a freeway, the higher the NO₂ levels outside their homes. NO₂ levels also corresponded with traffic-related pollution estimates from the group's statistical model.

It was not surprising, then, when they found that the closer the students lived to a freeway, the higher the students' asthma prevalence.

For every 1.2 kilometers (about three-quarters of a mile) the students lived closer to the freeway, asthma risk increased by 89 percent. For example, students who lived 400 meters from the freeway had an 89 percent higher risk of asthma than students living 1,600 meters away from the freeway.

Interestingly, the researchers saw that air pollution from freeway traffic influenced NO₂ concentrations at homes more strongly than pollution from other types of roads. Traffic counts within 150 meters of homes (which primarily comprised traffic from smaller streets) were only weakly correlated with measured NO₂.

In any community, a freeway is a major source of air pollution.

“Cars and trucks traveling on freeways and other large roads may be a bigger source of pollutants that matter for asthma than traffic on smaller roads,” Gauderman said. Scientists also find it difficult to get good data on traffic on smaller streets, which may make it harder to find associations between asthma and local traffic.

Gauderman cautioned that researchers do not yet know that NO₂ is to blame for the asthma. NO₂ travels together with other airborne pollutants, such as particulate matter, so it may be a marker for other asthma-causing pollutants.

Study sites included the cities of Alpine, Atascadero, Lake Elsinore, Lancaster, Long Beach, Mira Loma, Riverside, San Dimas, Santa Maria and Upland.

The Children's Health Study is supported by the NIEHS, California Air Resources Board, the Southern California Particle Center and Supersite, the Environmental Protection Agency and the Hastings Foundation.



CALIFORNIA BREATHING

Initiatives and Information for Asthma Advocates in California

Sacramento County Asthma Profile

May 2011

In Sacramento County, approximately 214,000 children and adults have been diagnosed with asthma.

Lifetime Asthma Prevalence,² 2009

People who have ever been diagnosed with asthma by a health provider

Percent with Lifetime Asthma (95% Confidence Interval³)

	Age	Sacramento County	California
Children	0-4	--	7.7 (6.2-9.2)
	5-17	12.7 (6.9-18.6)	16.2 (14.9-17.6)
Adults	18-64	17.3 (13.6-20.9)	13.8 (12.9-14.7)
	65+	11.9 (7.6-16.3)	11.8 (11.0-12.7)
Totals:	0-17	12.7 (7.8-17.7)	14.2 (13.1-15.3)
	18+	16.5 (13.3-19.6)	13.5 (12.8-14.3)
	All Ages	15.5 (12.8-18.2)	13.7 (13.1-14.3)

Data Source: California Health Interview Survey (CHIS), 2009

Notes

1. PI = Pacific Islander; Please see technical notes for more information on race/ethnicity categorizations.
2. Lifetime asthma prevalence is the proportion of people in the population who have ever been diagnosed with asthma by a health provider.
3. The 95% confidence interval (CI) is a range that expresses a level of certainty about an estimate based on the margin of error.

The 95% CI means that we are 95 percent confident that this range contains the true population

percent. A narrow CI means that there is less variability in the estimate and/or there is a larger sample size. A wide CI indicates more variability and/or a smaller sample size.

4. Active asthma prevalence is the proportion of people in the population who have ever been diagnosed with asthma by a health provider and report that they still have asthma and/or report that they had an episode or attack within the past 12 months.
5. Work-related asthma is asthma that is caused or triggered by conditions or substances in the workplace.
6. Balmes J, Becklake M, Blanc P, et al. Environmental and Occupational Health Assembly, American Thoracic Society. American Thoracic Society Statement: Occupational Contribution to the Burden of Airway Disease. *Am J Respir Crit Care Med*. 2003;167:787-797; Lutzker L, Rafferty A, Brunner W, et al. Prevalence of Work-related Asthma in Michigan, Minnesota, and Oregon. *Journal of Asthma*. 2010;47:156-161.
7. Obesity is defined as a body mass index (BMI) of 30 or greater.
8. Data Sources for Asthma Risk Factors: Smoking — CHIS, 2009; Obesity — CHIS, 2009; Poverty Level — American Community Survey, 2007-2009; Unemployment Rate — State of California Employment Development Department, 2009
9. An asthma death is a death where asthma was indicated as the underlying cause on the death certificate. The rate of asthma deaths is the number of deaths per 1,000,000 residents, age-adjusted to the 2000 U.S. population.
10. An asthma ED visit is an admission to a licensed ED in California with the primary diagnosis of asthma. The rate of asthma ED visits is the number of visits per 10,000 residents, age-adjusted to the 2000 U.S. population.
11. Population denominators for rates are from the California Department of Finance. All rates are age-adjusted to the 2000 U.S. population. Age-adjusted rates are modified to eliminate the effect of different age distributions in different populations. Rates based on numbers <20 are not reported.
12. An asthma hospitalization is a discharge from a licensed acute care hospital in California with the primary diagnosis of asthma. The rate of asthma hospitalizations is the number of hospitalizations per 10,000 residents, age-adjusted to the 2000 U.S. population.
13. Charges for asthma hospitalizations are the only type of data available to assess the costs of asthma in California counties. However, there are many other costs associated with asthma, including other types of health care utilization, medications, and indirect costs due to factors such as school and work missed.
14. Healthy People 2010 (HP2010) is a set of national benchmarks for a wide range of health topics, including asthma. For more information on HP2010, visit www.healthypeople.gov.
15. Outdoor air quality data—including exposures such as PM2.5, PM10, ozone, and traffic pollution—can be found online through the California Environmental Health Tracking Program’s Air Quality Data Query or on the California Air Resources Board website.

Additional References on Health Impacts of Location of Homes:

[1] California Environmental Protection Air Resources Board. Status of research on potential mitigation concepts to reduce exposure to nearby traffic pollution, August 23, 2012, p. 2-3.

[2] Brown MS, Sarnat SE, DeMuth KA, Brown LA, Whitlock DR, Brown SW, Tolbert PE, Fitzpatrick AM. Residential proximity to a major roadway is associated with features of asthma control in children. *PLoS One*. 2012;7(5):e37044. doi: 10.1371/journal.pone.0037044. Epub 2012 May 17.

[3] Urman R, McConnell R, Islam T, Avol EL, Lurmann FW, Vora H, Linn WS, Rappaport EB, Gilliland FD, Gauderman WJ. Associations of children's lung function with ambient air pollution: joint effects of regional and near-roadway pollutants. *Thorax*. 2013 Nov 19. doi: 10.1136/thoraxjnl-2012-203159.

[4] Volk HE, Hertz-Picciotto I, Delwiche L, Lurmann F, McConnell R. Residential proximity to freeways and autism in the CHARGE study. *Environ Health Perspect*. 2011 Jun;119(6):873-7. doi: 10.1289/ehp.1002835. Epub 2010 Dec 13.

[5] California Environmental Protection Agency California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005, p. 10.

Dana Allen

From: Ellen Cochrane <ellencochrane@hotmail.com>
Sent: Friday, January 10, 2014 4:00 PM
To: Dana Allen
Subject: McKinley Village Draft Environmental Impact Report Comment

Response letter to the McKinley Village Draft Environmental Impact Report

The Draft Environmental Impact Report for McKinley Village makes no mention of the effect the development will have on McKinley Park. I request that the project's planning and financial team address the following:

McKinley Park Library

Additional families will make use of the excellent services provided by this small public library. Attendance will rise at events and check outs and visits will increase. There is no provision to help this already struggling institution. The developers have not addressed the issue of increased usage adding stress to this underfunded county library.

McKinley Park Pond

The McKinley Park Pond has a broken, pox-marked bank, substandard filtering system, no fencing, animal habitat mismanagement, and chronic litter. This beloved park pond is currently under maximum stress and decay and our city government cannot fund its rehabilitation. The developers have not provided a provision for any help or support of this neighborhood landmark.

McKinley Park Turf/Jogging Track

The park turf suffers from scuffed out tufts, brown patches and dead areas. Park activities have worked grooves into the lawn and jogging track and deteriorated the quality of the grounds. The city cannot keep up with the repairs that are needed because of lack of money. The developers have not provided a provision for any help or support of these park features.

I request that the developer study the impacts of the development on McKinley Park and create a protection and intervention plan for this treasured public area, should the project goes through.

The study should examine all the McKinley Park recreational areas (i.e. tennis courts, rose garden, softball field, picnic areas...) and forecast the areas that will be heavily impacted. The study should identify upkeep costs with increased usage and develop and 25 year management plan with the City of Sacramento.

The intervention measures should include a yearly tax on the households of McKinley Village of \$500/house to support the McKinley Library, McKinley Pond and the McKinley Jogging Track and sod areas, and any other areas in the park that will be impacted.

It's simply not moral that a developer be able to plunk down hundreds of homes, sell off his interests, and then leave East Sacramento with a park needing even more funds to continue its operation. Civic responsibility must be enforced; developers will not willingly volunteer to do the right thing.

s/Ellen Cochrane
926-43rd Street
Sacramento, CA
95819
(916) 457-2725

McKinley (MKV) Village DEIR
John and Marylou Allen

Traffic

To begin with, they fail to mention that their traffic study was conducted during the summer when Theodore Judah School was out and so there was less traffic; and that there were many street closures in the area due to city work on water systems which also does not reflect normal volume and usage. These both have very much skewed the overall data that they collected.

They also conveniently have left out their own calculations for 3,500+ vehicular trips being generated each day by MKV. Furthermore, they have not factored into the overall situation the additional traffic increases from the Stonebridge development with another 1,000+ vehicular trips per day.

Also, the traffic report does not take into account the hundreds of vehicular trips that the Stonebridge development will be adding on East Sac streets. Nor for that matter there is no mention of what impact of future cumulative increase in overall traffic throughout East Sac.

40th Street and Alhambra

If this access is built, there then will be a critical need to put a stop light at 40th and C Streets, along with cross walk lights for the children that are supposed to be walking to Theodore Judah School. How else will they (or for that matter anyone else) be able cross C St.-Elvas Blvd.? Otherwise, this intersection will just become another "crash corner." Sadly we will no doubt begin to see more White Bikes to mark where bicyclists and pedestrians have been killed by automobiles in our neighborhood.

Also, to cut back on the dangerous levels of speed along C St.-Elvas Blvd., a medium strip needs to be put in place by the developer as well, along with stop signs and bike lanes on both sides of the road. (All of which the developer should pay for!) This may help to slow down traffic a bit.

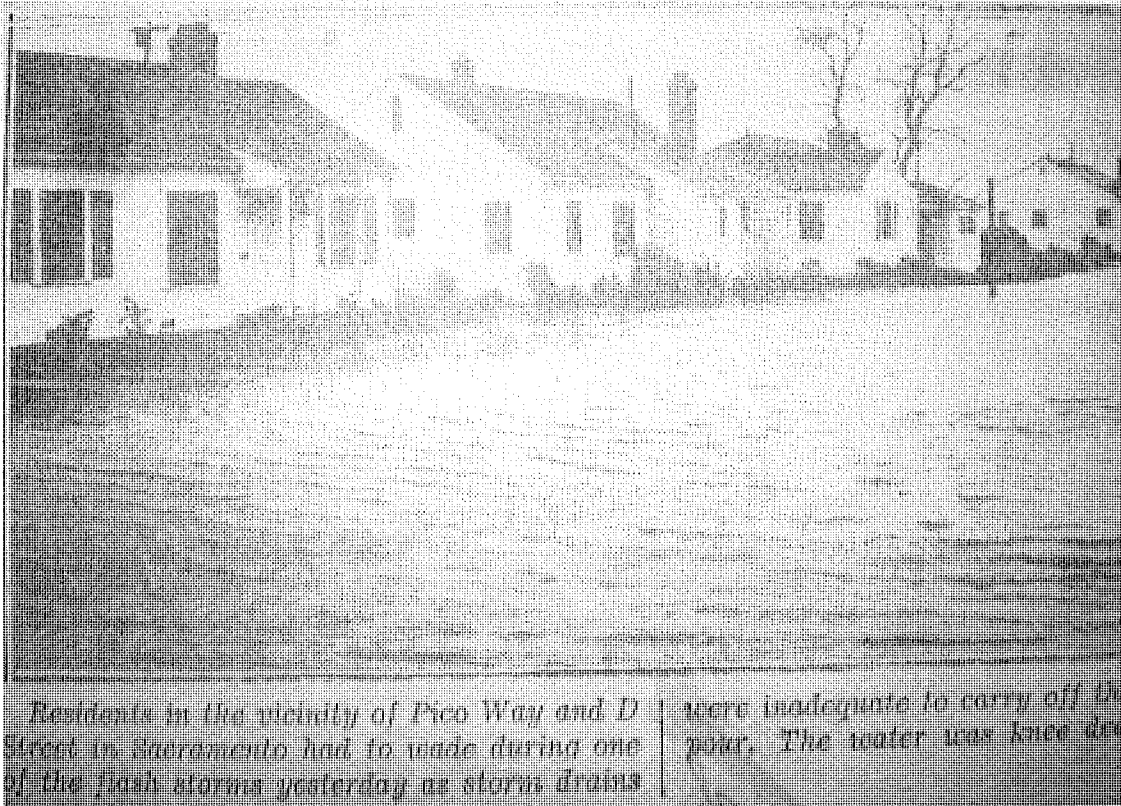
Furthermore, most residents, after waiting for one of the 30-60 trains to pass at 28th St. each day, will more than likely wind up using the 40th St. exit instead. This will place tremendous pressure on just one single exit. To relieve this situation, a second automobile access point should be built at Alhambra to mitigate the problem.

Schools

The mailer failed to make any mention of the increased number of children who will need to attend neighborhood schools from the Stonebridge development with 120 planned units. Furthermore they have failed to calculate into their number the students who have been displace from the closure of Washington School. Finally they are basing their estimate of school attendance on the low expectation that only 0.94 students per household will be going to Theodore Judah. Instead, with two to three kids per household, the number would in fact be hundreds of more students added onto already limited school resources.

Drainage

They MKV site is currently a bathtub without a drain. By connecting up MKV to East Sac antiquated and combined sewer-storm drainage systems, the project will place East Sac at even greater risk of localized flooding. This has been an ongoing problem for East Sac residents for many years



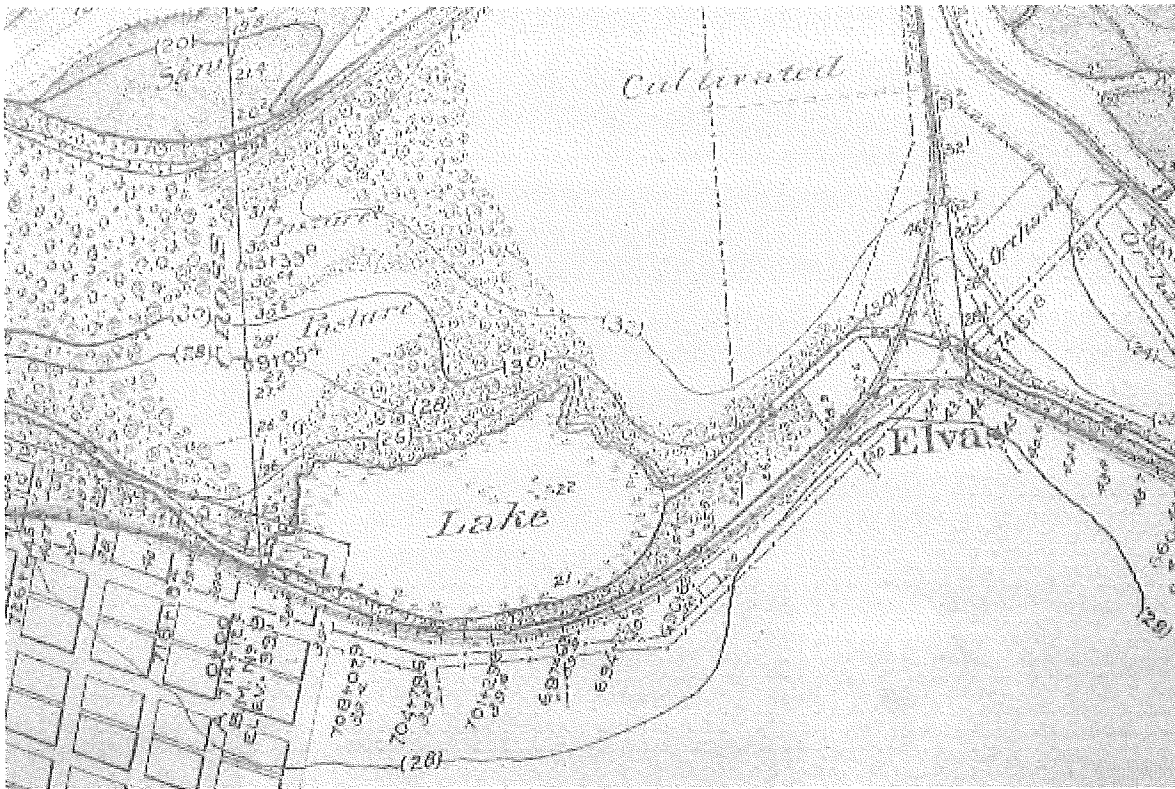
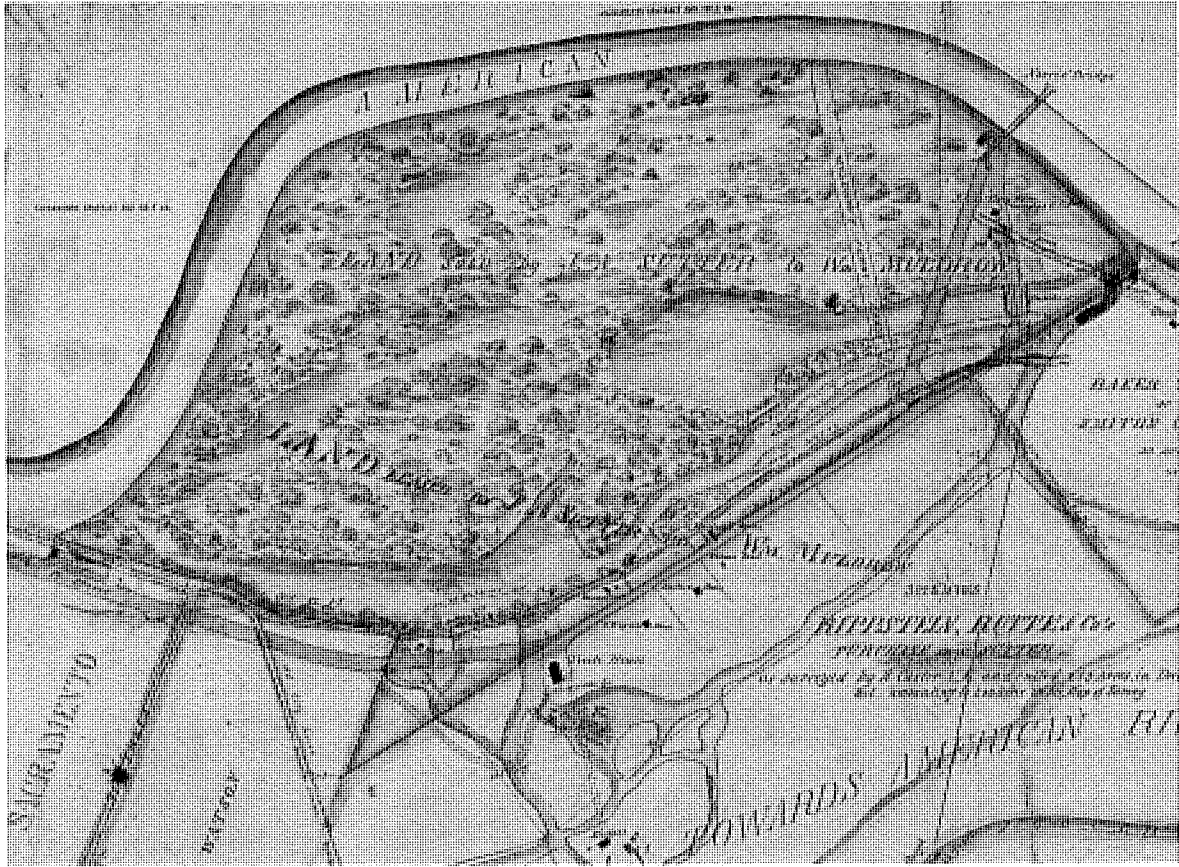
Rain dumps of 10 or more inches of rain in a very short period of time are would overwhelm this system even without additional drainage from MKV. It is hard to not see how this will not impact East Sac. Say for example a 10 inch down pour in a short period of time would lead to around 13.5 million gallons of water for 50 acres. How would this volume of flood runoff be handled by a detention pond designed to handle only 8 acre feet (c. 2.6 million gallons)? Would it remain in MKV? Would this then only wind up only being the “nuisance” for its residents which is spoken about in the report? Some nuisance! At the very least the home should have elevated foundations and escape hatches built into their roofs.



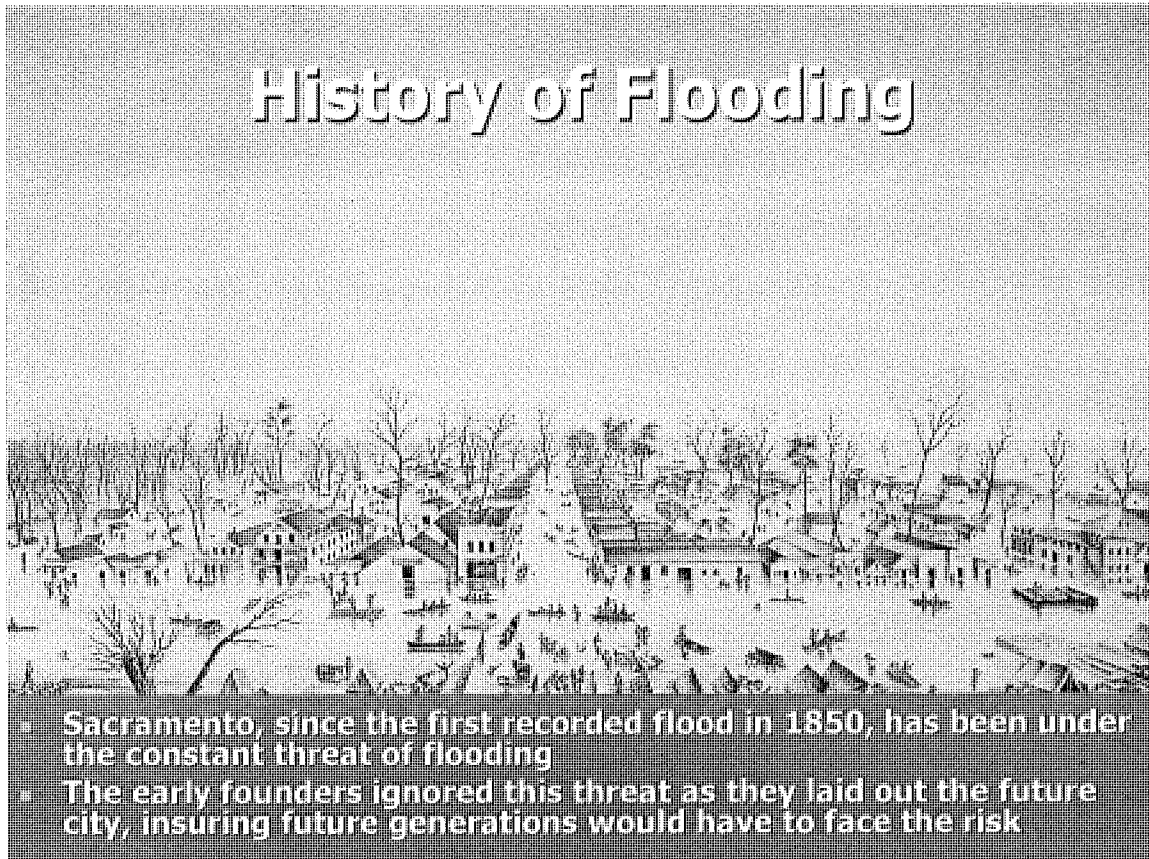
H Street 1983

Vague assurances of mitigation in the future are found throughout Section 4.5. Two key words stand out here – “future” and “potential.” Both imply that there is no guarantee anything is mandated or will be in place. They represent a failure on the developers and planners to be fully forth coming with vital information at the time when the public (the tax-payers) and the decision makers (who they elected) are confronted with having to pass judgment on a project that will impact their lives for years to come. And who will pay for these mitigations? The developer? The builder? The home owners association? Or the tax payer? There needs to be a full disclosure made now that identifies the parties who are financially responsible should any future litigation and settlements take place.

Flooding



The proposed McKinley Village development poses some critical questions for not only Midtown and east Sacramento, but for the city and the state as well. The site of the current proposed McKinley Village (MKV) project – the most recent of the many proposals for the location – has never been developed. There are some very good reasons for why this location has not been developed.



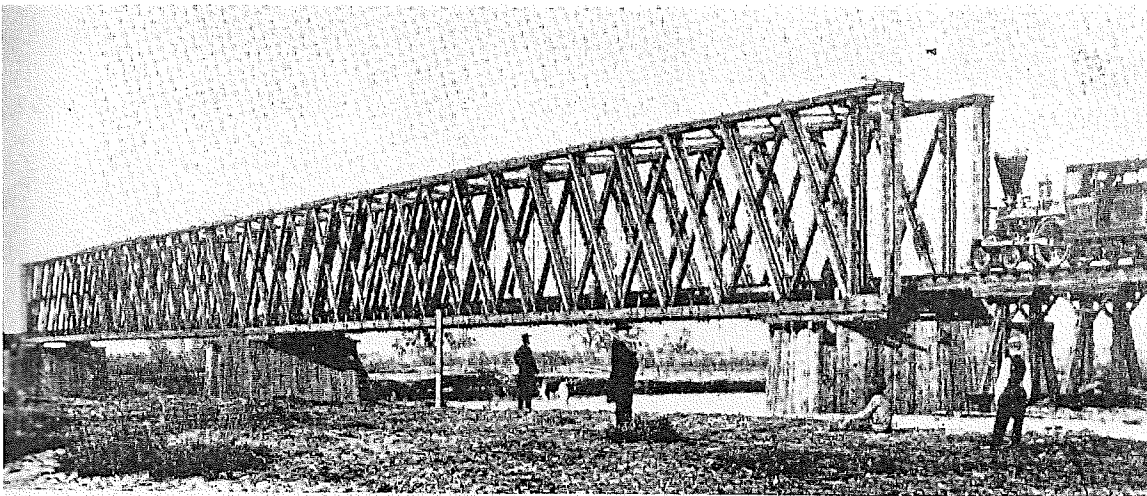
Over 150 years ago, city founders avoided including the location within first levee systems due to low elevation, swamps, quicksand, sloughs, and even a lake! Three of the four breaks that led to worst flood in Sacramento's history in 1861-2, took place adjacent to this site – e.g. B and 28th Sts, Alhambra and C St. When the transcontinental railroad was being built in 1863, the builders bypassed the area because of its flood prone nature. Given the location's lengthy troubled history, is it any wonder that the area has been seen for what it really is – river bottom land? More than a century ago, Sacramentans deemed the land only suitable for agricultural purposes – e.g. "Smith's Gardens" and "Muldrow's Gardens." The area was only incorporated into the city limits in 1964, to further the expansion of the city dump and, had the freeway been routed differently, the area might have become an "infill" site with trash from the old city dump.

The current Union Pacific Railroad (formerly Southern Pacific) levee embankment has been built up and widened over the last 150 years, and during that time, has provided the city with its primary or secondary line of defense against flooding. Even as late as 1928, the city was saved from a major flood by the railroad embankment after the levee along the American River failed – North Sacramento was not so fortunate.

Current Sacramento Area Flood Control Agency (SAFCA) studies still recognize its vital role in offering Midtown and East Sacramento districts, the city in general and and the capitol of California with a further line of flood protection. The proposed plan to puncture it with two (?) new underpass accesses (Alhambra Blvd. and 40th St.) will increase by 20% the number of openings, making it even more likely that there could be a major failure because of antiquated flood gate equipment, missing parts or not even enough personnel to carry out the closure of the floodgates in time.

Even if developed, the area could suffer a major catastrophic flood with much loss of life and property. According to a 2005 regional flood scenario study, the site could be covered in up to 25 feet of water within two hours or less – turning it from an evacuation site to a rescue site!

A Proven Track Record



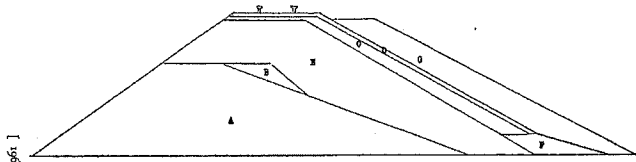
The first bridge on the CP crossed the American River 4 miles east of Sacramento. Fire destroyed this double Howe Truss in 1870, and an iron structure replaced it.

Since 1863, the Union Pacific (the old Southern Pacific) railroad embankments became the basis for the first levees which provided most of East Sacramento with flood protection. It has served as either the primary or secondary levee for Sacramento since 1863. Over the years as the line was double tracked, the roadbed was raised and widened. The county and Union (Southern) Pacific RR continued to build up, strengthen and reinforce the sides of the earlier embankment. It has served as the first line of defense and directly withstood floods – e.g. 1867, 1871, 1875, 1878, 1892-3, 1906, 1907, 1909, 1911, 1914, 1915, 1917, 1927, 1928. They have also provided a backup tier of defense during the floods of 1930, 1935, 1937, 1938, 1940, 1950, 1955, 1964, 1973, 1983, 1986, 1997.



Many now dismiss this tried and track proven levee as now being antiquated and altogether irrelevant to Sacramento's flood protection needs. Though never intended to meet all of the city's protection perimeters, the embankment-levee is still there (along with its flood gates) after more than a 150 years. Even a Sacramento Area Flood Control Agency (SAFCA) video, "Sacramento Flood Story," has the railroad embankment holding back rising flood waters and providing precious time for evacuation in a dramatization of a flood event scenario.

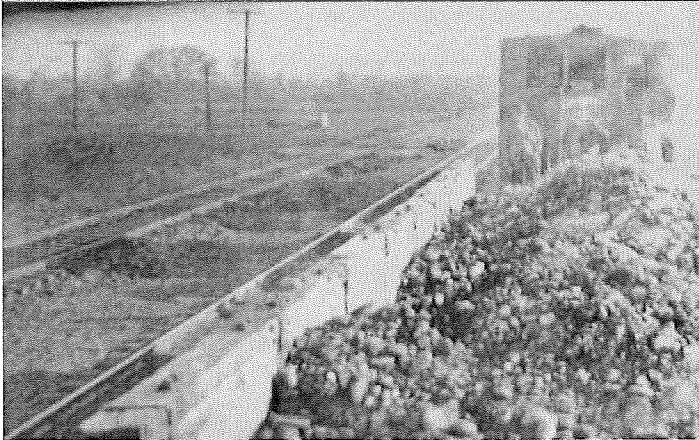
Not bad for "old school" construction. So claims that the railroad embankment is "not a certified levee" are more than misleading, they are down right false. These embankments have provided Sacramento with over 150 years of flood protection! Not a bad track record! No attention was given in the DEIR to conducting archaeological work and an engineering examination during the cuts in the railroad embankment. Besides being part of the original transcontinental roadbed, it would also be important to learn about the stratigraphy and internal structure and materials used in its embankment's construction. (See diagrams below from Marysville levees)



[96]

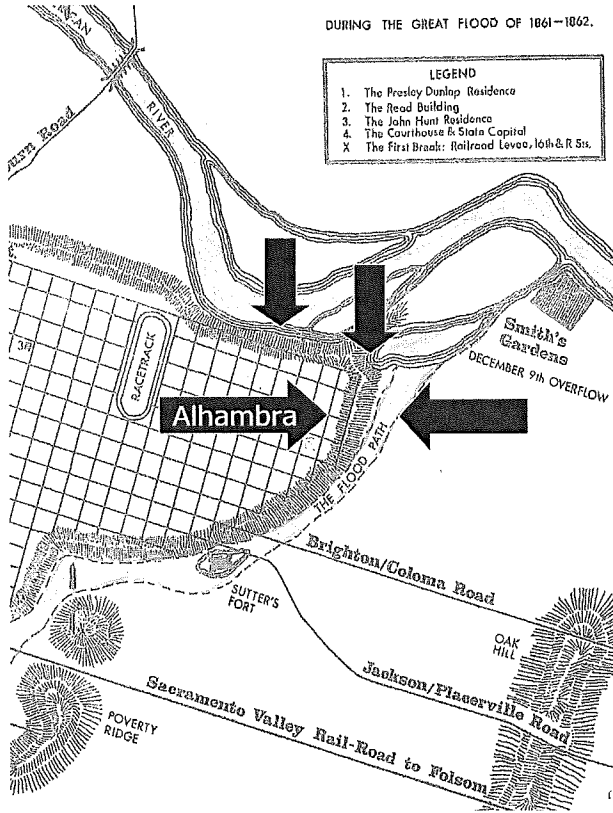
MARYSVILLE LEVEE AT COUNTY HOSPITAL

- A. Old levee on March 19th, 1907; flood was within two inches of crown.
 - B. Earth fill, brought in by Western Pacific trains.
 - E. Dredge tailings from Oroville by Western Pacific.
 - C. Red dirt with part gravel from Oroville by Western Pacific for "verser."
 - D. Additional clay slab by Southern Pacific Co. to prevent seepage.
 - F. Earth fill with scrapers by Cozenbrook Bros.
 - G. Earth slab in 1935; paid for by State & Federal funds.
- SCALE. Ten feet to one inch, approx.



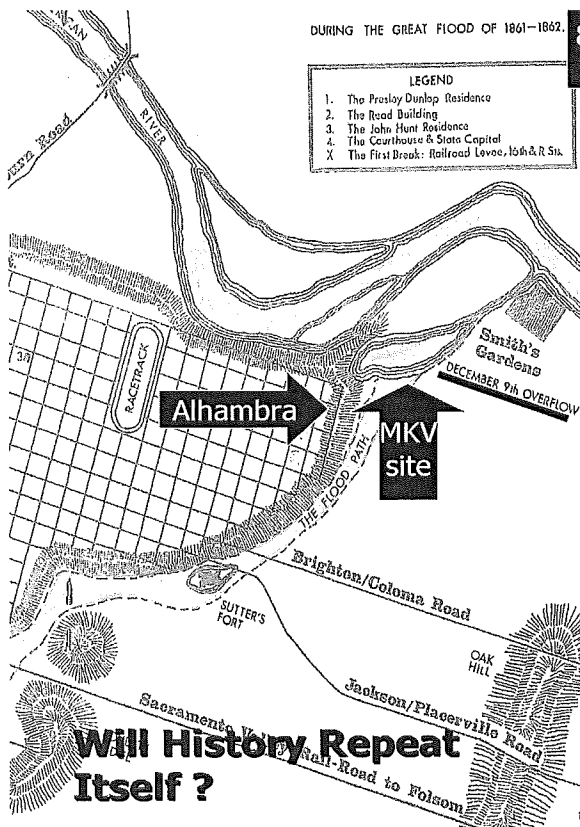
RR Bed

- Part of the UPRR embankment was built over the original B St levee and then extended in a southerly direction paralleling the American River in the 1860s
- It was probably added to as it was raised, widened and strengthened over the past 150 years with various types of materials

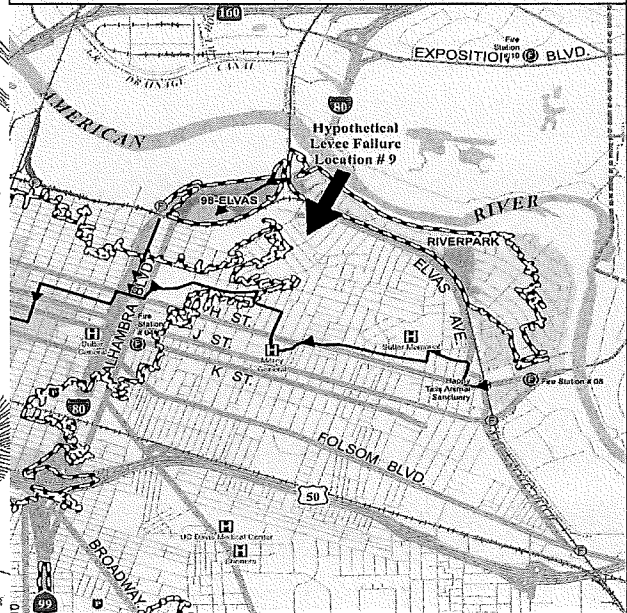
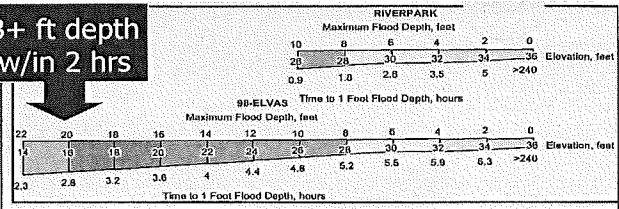


3 Major Breaks

- The winter flood of 1861-2, was the worst flood in the recorded history of Sacramento
- Sacramento was buried in some places under 4-8 feet of mud and silt
- This great flood was actually a series of four separate floods
- 3 of the 4 floods began in East Sac and Midtown areas very close to MKV site



8+ ft depth
w/in 2 hrs



Will History Repeat
Itself ?

Shouldn't the city do everything in its power to improve upon this backup system? Just as a good general would have contingency plans with multiple lines of defense in case of the need to fall back to a secondary defensive position, so to should our city officials, who are charged first and foremost, with the safety of Sacramento and her citizens, likewise build on this second line of defense in their active planning for the next major flood event. Putting still more breaches

A levee system is only as strong as its weakest points -- and its weakest points are the floodgates. There are currently 10 pedestrian and vehicle access points cut through the levee -- 7th, 12th, 16th, pedestrian, Western Pacific railroad (both around 18th), Biz-80, H St, J St, CSUS pedestrian access, Folsom Blvd. (Hope I haven't left anything out) Adding two more cuts will increase the possible threat of failure by 20%. Remember there has also been a 20% cut in city staffing. There are already too many floodgates to close as it is! Adding more will greatly increase the chance of a total systems failure.

The developers of McKinley Village intend to cut 2 new breaches in the RR levee embankment (at Alhambra, and 40th St) -- adding 2 more breaches to the 11 current openings (including 6 in East Sac alone!). Despite the installation of floodgates these new openings represent a 20% increase in the total number. Each floodgate has to be closed manually, with many having to be assembled on the spot by 10-man crews and then sandbagged for leaks.



Furthermore, this will increase even more the possible flood threat to East Sac and the rest of the city. Beware of the so called "floodgate" protection you wind up with in these breaches. Instead of getting more costly self-closing, real floodGATES, we will instead probably get the do-it-yourself variety of erector set assemble type of (much cheaper) barriers (e.g. top logs, multiple panel A-frames or gasket gates to name a few). Keep in mind these latter options will actually require a crew of up to 10 men to assemble them AND sand bag them (as they usually leak) and take from one to four hours to close and seal. Then there are the floodgates to the north of the river as well! Keep in mind the

city has sustained a 20% cut in staffing which will surely impact response times during an emergency. That and the likely hood that many city employees may not even be able to get to work or the sites due to major or localized flooding, road closures, etc.



1 - Comparison to 120 & Broadway (at Town's canal pumps)

Remember not all floodgates are created equal and the developer has been not at all forthcoming with any real details about the type or their construction! People mistakenly have in mind something like the side hinge closing gates at 7th Street. Why aren't the designs for the 2 new floodgates at Alhambra and 40th included in the DEIR? The people of Sacramento deserve to have the full opportunity to review them now before the final EIR is issued. At the very least, 2 state-of-art, automatically closing, side-hinged floodgates need to be installed at the Alhambra and 40th breaches. This would at least reduce the need to have more overstretched city staff required for their closure.



The threat of flooding is the single most important issue confronting the city and people of Sacramento for the past 160 years. It continues to pose a Katrina-like threat today to hundreds of thousands of people – making Sacramento the second most flood prone city in the U.S.

The proposed 40th Street underpass would breach the second line of defense for East Sacramento and the city in general. Flooding within “McKinley Village” would put its 1500+ residents in grave and immediate danger – whether to close or not to close the flood gates? This while the city has to make similar decisions regarding other threatened locations north and south along the river.

Elevations in East Sacramento ranging from 15 to 56 feet in height. Even small variations in just a few feet of elevation can spell disaster – e.g. 10 foot deep flood level at Clunie Center and McKinley Park area. Ironically, the only probable safe places in all of Midtown-East Sacramento area during a flood would be East Lawn Cemetery and the old city dump!

The McKinley Village Project is just another example in a long pattern of risky land development in Sacramento. The proposed site puts its occupants at grave and immediate risk during a flood. Evacuation and rescue of over 1500+ residents of McKinley Village may prove to be next to impossible in the short time that is necessary to do so. The proposed plans for opening up the 40th underpass also puts the rest of East Sacramento in even greater danger – not only from the direct impact of flooding, but also from cutting vital rescue or evacuation routes and isolating much of East Sacramento from outside assistance.

Despite assurances that the risk of catastrophic flooding is minimal, the threat nevertheless still exists. And even in drought cycles! The threat will less likely come

from a failure of Folsom Dam, but instead from multiple levee failures or over topping simultaneously taking place along the American River.

The flood threats to East Sac and Midtown take basic 3 forms – two which can be seen and one that cannot: over topping of the American River; local internal flooding; and storm/sewer overflow. MKV project could possibly have serious impacts which could negatively affect any or all of these potential threats to flood protection

There are many facilities in Mid-town-East Sacramento that could potentially be impacted by flooding: 3 major hospitals; 2 fire stations; a California National Guard Armory; SMUD facilities; 7 schools; numerous daycare and eldercare facilities; 12 churches (potential relocation centers?); 1 animal hospital and 1 animal shelter. What provisions have been taken to facture in these facilities. Why have these issued not been fully addressed as they will surely be impacted should flood risks be increased for the area?

The DEIR makes an outright false statement when they claim that MKV will have “the same level of protection as East Sacramento, Midtown and Downtown.” Really? “Same” here must have a different meaning than the Oxford English Dictionary’s definition of the word – “identical, not different, unchanged, unvarying” Perhaps its meaning is closer to the original Latin word from which it is derived – *simulo*, “to pretend a thing is so.” So why is this development on the OTHER side of a secondary levee with floodgates which are there to provide a further line of defense for Sacramento in case of a failure of the American River levee system? The same level? I don’t think so!

Floodgates and Underpasses



Beginning in 1912, Sacramento constructed its first underpass through the B St RR embankment. Further accesses were added over the years along with floodgates. With the addition of each new underpass or cut through the UPRR levee, the risk of flooding of

the rest of the city only increases. The proposed vehicle underpass openings in the UPRR embankment at 40th Street and Alhambra and B Street pedestrian access, pose a serious

The proposed vehicle underpass opening in the UPRR embankment at 40th Street and Alhambra and B Street pedestrian access, pose a serious threat to this second and last line of defense for Sacramento. Adding 2 more to a system of 11 current breaches could over burden the whole system – adding further chinks in its armor and basically turning the whole UPRR levee into sieve.

How will city workers tasked to manually close the floodgates carry out their duties in timely fashion – especially if they themselves are blocked from reaching each location by internal flooding? What about storage offsite of parts, equipment, etc? How will the increased number of RR embankment openings (not including Richards, 8th, 12th, 16, UPRR and pedestrian access, Business 80, H St, J St, CSUS pedestrian access , 65th St and 14th Ave. floodgates) be affected by new additions? Increasing their number, only increases the risk for Downtown, Midtown and East Sacramento in particular, the whole city in general and, by extension the Capitol, state government and the very governance and economy of the State of California! How will these issues be addressed? Levees are only as strong as their weakest points! So adding two more breaches to the system only further increases the number of weak points and thereby increases the risk of failure of the whole system.

Adding two more floodgate only raises or heightens already existing issues and concerns: antiquated equipment and missing parts; poor coordination, slow response times, and inexperienced crews; not enough crews to manually assembly floodgates or reach them in time; parts for floodgates stored off site preventing delivery to site in time; too few practice drills; flooded underpasses preventing access; “Business 80” floodgates have never put into operation!

Furthermore, underpasses themselves are often at risk of flooding and becoming inaccessible – blocking evacuation routes or closure of the floodgates. Flooding could also cut off evacuation along Hwy 80, Hwy 50, H Street Bridge, Light Rail corridors, etc. – making for dangerous conditions that could see hundreds or thousands being trapped in the central Sacramento area.



“Water planners and engineers established the “100-year flood” concept not to indicate the actual frequency of such events, but predict the likelihood of serious floods. Unfortunately, such predictions were based only on records of flooding available since statehood, in 1850.” (David Carle, Introduction to Water in California, 2004)

It is true that improvements to the levee system and Folsom dam have increased Sacramento’s degree of flood protection: many miles of levee improvements along the American (100 years); widening the dam outlets (140 years); and raising the elevation of Folsom dam (potentially 213 years).

It should always be kept in mind, however, that any figures based on so many years of flood protection do not actually represent any guarantee, only a prediction of possible flood events taking place in the future. This is due to the fact that they are based on records only going back to 1850

Given this lack of long range data, and the continued studies of global warming and its impact on weather patterns and long term climate, more unstable weather patterns (and less predictable forecasting) will become the norm. Rising sea levels also mean rising river (and flood stage) elevations too.

Instead our mind set should be; the farther removed in time we are from the last catastrophic flood, the closer we are to the next major event. In reality, all bets are off when it comes to any true flood prediction. The threat is real, immediate and it is always there!

“Flood protection” as a concept and strategy, has been developed by numerous entities with a vested interest in – Army Corp of Engineers, FEMA, the insurance and construction industries and local governments. They did so in order to try to assure those in flood prone areas that the risk from flooding remains a more-or-less abstract concept which that can lull many into thinking it will not happen in their lifetimes and so they do not have to concern themselves with the eventuality of such an event taking place. (Keep in mind, even FEMA, in one of its documents, talks about “the 100 year flood myth.”)

By increasing the risk of inundating Downtown, Midtown and East Sacramento the risk is multiplied for the whole city in general and, by extension the Capitol, state government and the very governance and economy of the State of California! And it should be noted, given California’s vital importance for the country, to the nation’s economy. It should be kept in mind that a 1907 nation-wide depression, the “Panic of ’07,” was impart triggered by the devastation caused to the nation’s economy by the 1906 San Francisco earthquake and fire. So how will these issues be addressed?

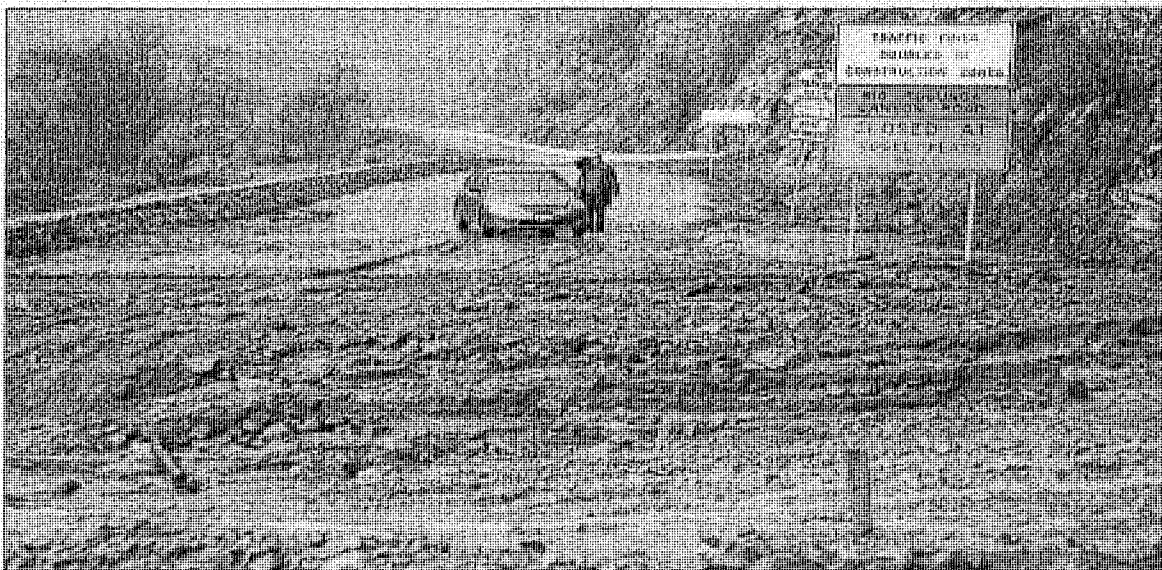
It Can’t Happen Here!

What if the state got 8 feet of rain in 3 weeks?
Experts are creating a model of such a deluge.
They call it ...

‘FRANKENSTORM’



AP/WIDE WORLD Associated Press



AP/WIDE WORLD Associated Press

A weeklong series of storms in Southern California last week pounded the coast with waves, top, and created mudslides on hillsides stripped of vegetation by wildfires, above. But such storms would be a drop in the bucket compared to a “Frankenstorm.”

SCIENTISTS SEEK TO ESTIMATE MAGNITUDE OF DAMAGE

Many remain skeptical (at their own risk) when it comes to the threat of a major flood in their lifetime; especially in times of drought.

Must we once again repeat the old Sacramento story of the many being put at great risk for the benefit of just a few? It vitally important to keep in mind, that the farther away in time you are from the last major disaster event, the closer you are to the next one. Will we once again allow ourselves to create another man-made disaster and then blame it on nature? Disaster does not have to become destiny!

By deemphasizing the potential for nature's destructive role and claiming that the risks are minimal, we try to rationalize and normalize disaster situations. This then allows us to evade, disavow and even deny any moral responsibility for our own short-sighted actions. Denial then allows for collective amnesia and the politics of forgetfulness. In turn we can set the blame on nature and not ourselves for "natural" disasters. In the end, "natural" disasters – like floods, quakes, storms – are really man-made disasters that just happen to intersect with the forces of nature. We cannot unmake the mistakes of the past, but we cab possibly prevent others from happening. Ultimately, the responsibility lies with us to make sure there are as few "natural" disasters in the future as possible.



Some of my first memories as a child here in Sacramento, are of floods. In the winter of 1955, my father took me to the American River levee somewhere near where CSUSacramento is today. All I could see in front of me was vast expanses of a leaden-gray sky and steel-gray flood waters extending as far as the eye could see. Then in 1986, while I was attending CSUS, I went up onto the same area of levee and saw a raging muddy river just a couple of feet below where I was standing!



I have no wish to repeat that experience and the fears that go with ever again. Still the threat is there AND it is real. Remember the farther in time we are removed from the last major flood event, the closer we are to the next.

I want to make sure that not only East Sac, but that the whole of our city, is protected as best as possible. It is the primary responsibility and duty of our elected officials and city staff and employees to protect the people they represent and serve. We need to do all in our powers to do this and not have Sacramento become the next New Orleans.

Dana Allen

From: george raya <georgeraya@yahoo.com>
Sent: Friday, January 10, 2014 4:55 PM
To: Dana Allen
Subject: RE:Comments on DEIR for McKinley Village Development

From:
George Raya
911 - 28th Street, Apt. 1
Sacramento, CA 95816
Cell: 916-508-5232
georgeraya@yahoo.com

To:
Dana Allen, Associate Planner
City of Sacramento , Community Development Dept.
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811

RE: Comments on DEIR for McKinley Village Development

Dear Mr. Allen:

I have been a resident of Midtown, off and on, since 1970. I moved into the house next door to to my current address, 903 - 28th Street, when I was a Junior at Sac State. I remember what Midtown was like when most of the streets were one-way. At 29th Street, 'I' Street was like a freeway, the folks from East Sac zooming to work.

Adding all this new traffic from McKinley Village won't make it as bad as the old days, but it will be a traffic problem. With cars coming down 28th Street from Sutter's Landing Regional Park/McKinley Village, all the street off of 28th will be jammed with new traffic. I notice there was no traffic study for D, E, F, and etc. There will be increased traffic at those intersections.

It was be a lot better if the traffic went a tunnel at Alhambra, instead of A Street.

As far as mitigation, there needs to be street lights along 28th Street, G through C Street, so pedestrians are seen by the automobile drivers.

George Raya

Dana Allen

From: Tamarin <lizzypod@hotmail.com>
Sent: Friday, January 10, 2014 4:53 PM
To: Dana Allen
Subject: Comments on McKinley Park Village

**Dana Allen, Associate Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811
dallen@cityofsacramento.org**

Dear Dana,

Please consider the following comments concerning the McKinley Village DEIR.

Transportation and Circulation

P. 2-46 - The document does not satisfactorily discuss the potential for vehicle access to Alhambra Blvd. It is apparently possible to construct an underpass large enough for city maintenance vehicles to go underneath the railroad tracks. Why not have two such underpasses and set limits on height of vehicles accessing the neighborhood through those access points? An alternative evaluating this option should be discussed in detail.

There is no discussion of access to Alhambra via overpass in lieu of the A Street access point. Alhambra is a key corridor for traffic. This would eliminate safety and traffic impacts on the adjacent neighborhood.

The DEIR rejects out of hand the possibility of having only the A Street and Alhambra as vehicle access points because of the potential need for multiple access points in case of emergency. This is no different than the situation in River Park, however, where the two access points are only blocks apart. This alternative should be discussed in detail.

There is no discussion of the possibility of having three access points: A Street; 40th and Alhambra. This option would address the majority of the traffic and safety concerns regarding the adjacent neighborhood as well as the emergency access concerns described in the DEIR.

The DEIR provides inadequate details and discussion of traffic during the estimated three years of construction. Specifically, the DEIR improperly proposes to defer any discussion of those details until a later time:

"Construction equipment and construction worker vehicles generally would be staged on site or at the adjacent Cannery Business Park site. Per City requirements, the project applicant is required to prepare a traffic management plan for construction vehicles and equipment that would be reviewed and approved by the City's Department of Public Works prior to beginning any construction activities."

The City cannot conclude there are insignificant effects or no need for mitigation without fully evaluating any such

traffic management plan.

The traffic analysis does not evaluate several key corridors for traffic. The majority of morning traffic from the project will presumably go downtown or onto the freeway. There is no evaluation of traffic from 36th and McKinley to the freeway, despite the fact that this is where most traffic will go to get on the E Street on-ramp (going east) or go under the freeway to get on the H Street on-ramp (going west). (See map locations 16 to location 8.)

There is no evaluation whatsoever of impacts to H Street or corridors going to H Street from the project. H Street provides the primary on-ramp to the freeway for traffic going west.

There is no evaluation of traffic from McKinley and 39th to H Street and 39th. 39th is a main corridor from the neighborhood to H Street because of the controlled intersections at 39th/H and 39th/J. There is no evaluation of the impact on this area.

There is no evaluation of corridors leading from the project downtown. No westbound midtown streets were part of the traffic study.

C Street between 33rd and Alhambra is effectively a one-way street where cars must pull over to the side to allow another car to pass in the opposite direction. The DEIR fails to address this narrowness of this road and related safety concerns sufficiently.

In addition, the project identifies C Street between 33rd and Alhambra as a “major collector” and establishes that such a corridor (a “two lane” with speed bumps) may have 8000 cars and still achieve level A service. Any person familiar with this stretch is aware – based on common sense - that this corridor cannot sustain 8000 cars per day (primarily during peak hours – perhaps 8000 makes sense over 24 hours) and have free flowing conditions. Given the existing conditions described above, any additional traffic in this stretch will be a significant impact. The DEIR not only fails to note the significant impact but proposes no mitigation measures for this segment to accommodate the increased traffic. This is a fatal flaw in the traffic study and conclusions.

The section on Trip Distribution fails to discuss impacted high schools other than Hiram Johnson. The vast majority of high school aged students in East Sacramento and River Park do not attend this high school. Rather, they attend McClatchy, Rio del Oro and West Campus. There is no discussion of traffic or other impacts of 300+ houses on those schools.

Mitigation Measure 4.9.1 is not a realistic option. The DEIR recognizes that traffic at H and Alhambra already experiences delays during peak traffic times. If merely retiming the signal is all that would be required to resolve that impact, the City would have already reduced the impact on that intersection. This is not a true mitigation measure. Therefore the identified significant impact has not been mitigated whatsoever.

The community has no access to regional transit, regional transit stops are not proposed in the project area, and the project is located too far from the nearest stops to encourage the use of public transportation. This is directly contrary to tenets of sustainable community strategies.

Other Comments

There is no discussion in the DEIR of the possibility of an East Sac High School on half of the property, with

mixed use/residential as proposed on the remainder of the parcel. I am requesting that the final EIR address such an alternative.

The DEIR acknowledges that the existing neighborhood and sewer system is inadequate and has had frequent flooding in recent years. The DEIR does not adequately address this problem. Specifically, in section 4.8, the DEIR proposes to address this problem at some point in the future: "Before the ultimate facilities can be constructed, the City requires a detailed pump station, force main, and detention tank design report be provided." This is an improper deferral of a critical project component, which must be analyzed before the City can conclude there is "no significant effect."

p. 2-45 - states that there would be flood gates on the underpass for pedestrian access. The DEIR does not address whether the construction of underpasses would affect the current determination of the adjacent neighborhood area (East Sac) as a "no flood zone."

Thank you for your consideration of these comments. I look forward to seeing them addressed in the Final EIR.

Tamarin Austin
270 San Miguel Way

Sacramento, CA 95819

Dana Allen

From: Susann Hadler <susannhadler@yahoo.com>
Sent: Friday, January 10, 2014 4:46 PM
To: Dana Allen
Subject: Mc Kinley Village

I just want to voice that I am firmly against the Mc Kinley village project. The impact on the current neighborhoods would be devastating. The J Street area has already become a mess since they changed the lane configurations to being only one lane each direction. More cars would impact the quality of life for the entire area. I have lived on 43rd Street since 1986 and would hate to see all of the negative changes that this development would cause.

Susann Hadler
1033 43rd Street

Dana Allen

From: Carl Seymour <carlscpp@surewest.net>
Sent: Friday, January 10, 2014 10:42 PM
To: Dana Allen
Subject: Comments on McKinley Village EIR

Dana,

I have reviewed bits of the draft EIR and proposed development plan, and have the following concerns.

1. C Street has incorrectly been identified as a "Major Collector", which is in fact incorrect. This has been brought up before, and our City Councilman Steve Cohen was supposed to have ensured that the error would be corrected. It apparently has not been. Standards for Major Collectors and residential streets are, and should be, different.
2. C Street traffic already exceeds the City's own stated standards for "residential livability". Further increases will effectively tilt this beyond livability, resulting in deterioration of the neighborhood.
3. The City's original plans called for Elvas Avenue to connect to 16th street via the project site, using the A Street overcrossing. As designed, the plan effectively closes forever the possibility of this important solution to East Sacramento traffic. McKinley Village's street system should be designed to allow the City to complete this "Elvas Expressway" in the future when it is needed. (It is needed now).
4. The proposed 16 foot sound wall will act to reflect sound from railroad trains into the existing neighborhoods, much like a "choral shell" reflects performers voices into the audience. Obtaining quiet for a new neighborhood at the expense of homes constructed in the early 1900's is not acceptable.
5. Placing housing so that it backs up against the railroad tracks is an extremely poor idea for several reasons. a) These homes will be undesirable to live in, resulting in high turnover. A "neighborhood" is not created when neighbors don't stay long enough to get to know each other. b) These homes will be risky to live in. Although it is rare, trains do derail, and we saw a catastrophic example of this recently near Fargo, North Dakota. Imagine if that massive fire had occurred in an area of occupied homes! People living and sleeping in homes next to railroad tracks would be at great risk should a derailment occur here. c) Currently, the homes along B Street abutting the railroad tracks experience "casing" by would-be burglars, who walk along the RR tracks and throw pebbles at the windows to see who is home. d) Home abutting the railroad tracks have very little privacy. For all of the above reasons, my friends who bought a home on B street ended up selling and moving very shortly after buying.

There is no reason to create a similar problem when starting from scratch. Rather, the main thoroughfare for McKinley Village should be next to railroad tracks, providing a more logical traffic flow, providing a safe zone in the event of catastrophic derailment, providing a

buffer zone from noise and vibration, and preserving the possibility of connecting Elvas to 16th street someday.

Sincerely,

Carl Seymour
3116 C Street
(916) 444-9164 ext. 301

Dear Ms. Allen,

January 10, 2014

Thank you for getting back to me about the procedure for submitting comments on the McKinley Village DEIR. I appreciate the opportunity to share my views.

Overall, I believe the McKinley Village (McV) project would be a disaster for Sacramento. I also believe the project DEIR is a whitewash basically designed to facilitate the advent of that disaster.

Before discussing my own objections to McV, I want to point out that Dave Edwards, Land Use Chair for East Sacramento Preservation (a neighborhood association) has prepared a multi-page summary of comments on the DEIR. I heartily endorse Mr. Edward's comments, and I firmly believe city staff should read, ponder, and fully answer each of his concerns.

First and foremost on my own list of concerns is traffic. To get residents out of the McV bowl, developers will blast a tunnel through the secondary levee at C Street between 40th St. and Tivoli. The exit of these McV drivers would unleash a ruinous influx of traffic on the quiet, fragile neighborhood that comprises East Sacramento. Car exhaust will pollute the air, and the vehicles themselves imperil pedestrians. The very fabric of the neighborhood will be eroded. Home values will decrease. No one wants to live on a busy street.

My second concern (even in the current water crisis) is the inevitable risk of flooding that will be present once holes are punched in the railroad berm. I question the wisdom of making two (planned) holes in a structure that is doing a nice job of protecting us.

Finally, I believe there are much better uses for the McV land. What about a plant nursery, a museum, a vocational school, veterans' hospital, commercial solar energy system??

East Sacramento is a classic neighborhood. It charms residents and visitors alike. It adds great value to the city.

WHY WOULD WE CHOSE TO DESTROY SUCH A BEAUTIFUL ASSET?

Sincerely
Janet Maira