

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE
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SACRAMENTO, CA 95833
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January 10, 2014

032013-SAC-0179
03-SAC-51 / PM 2.03
SCH#2008082049
P08-086

Ms. Dana Allen
Planning Division
City of Sacramento
300 Richards Blvd., 3rd Floor
Sacramento, CA 95811-0218

McKinley Village – Draft Environmental Impact Report (DEIR)

Dear Ms. Allen:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the McKinley Village Project DEIR. The project consists of the construction and operation of a 328-unit residential development, a neighborhood recreation center with incidental retail uses, parks, and associated infrastructure on an approximately 48.75-acre site. The project is bounded by State Route 51 (Business 80) and currently has access via A Street, a two-lane overpass across Business 80 that connects the development with downtown Sacramento through the Sutter's Landing Regional Park, and another access from 40th Street in East Sacramento. There is no existing or proposed direct access to the State Highway System (SHS) from the proposed McKinley Village Project. The following comments are based on the DEIR.

Traffic Impact Study (TIS) Methodology

On page 4.9-43 of the DEIR in Figure 4.9-8, seventeen percent of the proposed project's outbound traffic will access eastbound Business 80 at the E Street on-ramp. The methodology used to calculate Level of Service (LOS) on Business 80 is incorrect because it did not consider the cumulative delay caused by bottlenecks downstream on mainline Business 80. As a result, the LOS (delay) shown in Table 4.9-12, on page 4.9-57, does not reflect existing conditions. LOS is depicted as "D" when it should be "F" as noted in the table's footnotes which state, "** Observed LOS is worse than reported. The analysis methodology does not fully capture traffic operations effects in congested locations with bottlenecks. ** Actual LOS would be worse as the project adds trips to a congested facility operating at LOS F. The analysis methodology does not fully capture traffic operations effects in congested locations.*" Caltrans requests the TIS

consider the true shock wave effect, and include the cumulative delay on mainline Business 80 in order to show the true traffic impacts of the proposed project.

Mitigation

On page 4.9-39 of the DEIR Table 4.9-8 indicates trip generation from the proposed project to be 266 trips during AM peak hours and 341 trips for the PM peak hours. On pages 4.9-41 and 4.9-43, Figures 4.9-7 and 4.9-8 indicate forty-three percent of trips will go to Business 80. Currently Business 80, in the vicinity of this project, is operating at LOS F during peak hours, and will be further exacerbated by the proposed project's traffic during peak hours. Continuous developments, such as this one, will increase traffic volumes, reduce speeds and reduce LOS in this segment of the corridor. However, no mitigation measures have been identified to mitigate the proposed project's traffic impacts to the SHS. Caltrans has serious concerns regarding the lack of adequate traffic analysis.

If impacts are identified once adequate traffic analysis is conducted, potential mitigation measures could include fair share contributions to the following projects:

- E Street Transition Lane Project;
- Sacramento Regional Transit District facilities in and around the project area;
- Fiber Optics Installation from United States (US 50) to Interstate (I-80);
- Auxiliary Lane Project southbound (SB) 80; and
- Ramp Meters on the T St. SB onramp, N St. SB onramp, and the H St. SB onramp.

Planned State Highway System Projects

The following is a list of planned SHS Projects, within the vicinity of McKinley Village, that are on the current Sacramento Area Council of Governments Metropolitan Transportation Plan, and should be considered:

- E Street Transition Lane Project;
- Bus / Carpool Lanes Project from US 50 to I-80. Caltrans recommends an approximate 25-foot easement to accommodate future widening on Business 80 from post-mile (PM) 1.683 to PM 2.448.

Encroachment Permit

Please be advised that any work or traffic control that would encroach onto the State Right of Way (ROW) requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State ROW must be submitted to the address below.

Ms. Dana Allen / City of Sacramento, Planning Division
January 10, 2014
Page 3

Mr. Tim Greutert
California Department of Transportation
District 3, Office of Permits
703 B Street, Marysville, CA 95901

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website at the following URL for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Hydraulics

There are two 36-inch, reinforced concrete pipes that convey run-off, toward the proposed development, from north to south under Business 80, and are located approximately 500 feet east of existing flood gates. The Master Storm Drainage Study did not mention these pipes. Caltrans is concerned about how the pipes will be addressed by the proposed development and requests further drainage studies to reveal these potential impacts prior to project approval.

A Street Bridge

On pages 2-10, 2-58, and 4.9-93 the DEIR discusses a new sidewalk for the north side of the A Street Bridge. Caltrans requests the DEIR reflect that the new sidewalk is subject to Caltrans approval.

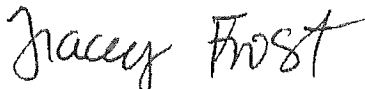
Transportation Management Plan (TMP)

Environmental Impact 4.9-5 indicates project build-out could cause potentially significant traffic impacts due to construction-related activities. Please add Caltrans, to Mitigation Measure 4.9-5, as a reviewer of the required construction traffic and parking TMP. TMPs must be prepared in accordance with Caltrans' *Manual on Uniform Traffic Control Devices*. Further information is available for download at the following web address:

<http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/pdf/camutcd2012/Part6.pdf>

If you have any questions regarding these comments or require additional information, please contact Arthur Murray, Intergovernmental Review Coordinator at (916) 274-0616 or by email at: Arthur.Murray@dot.ca.gov.

Sincerely,



TRACEY FROST, Interim Chief
Office of Transportation Planning - South

c: Scott Morgan, State Clearinghouse

PUBLIC UTILITIES COMMISSION

180 PROMENADE CIRCLE, SUITE 115
SACRAMENTO, CA 95834



December 17, 2013

Dana Allen
City of Sacramento
300 Richards Blvd
Sacramento, CA 95811

Re: Notice of Completion for McKinley Village Project, SCH #2008082049

Dear Dana Allen:

As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. New developments and improvements to existing facilities may increase vehicular traffic volumes, not only on streets and at intersections, but also at at-grade highway-rail crossings. In addition, projects may increase pedestrian traffic at crossings, and elsewhere along rail corridor rights-of-way. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers. A formal application to the CPUC is required for any new crossings along with an acceptable CEQA document.

The McKinley Village Project proposes the construction of two (one vehicle and one pedestrian) new grade separated railroad crossings to access the project area. It also proposes that the existing at-grade crossing at 28th Street be utilized as a second vehicle access the project property.

There needs to be a study done to evaluate traffic safety issues at the 28th Street at-grade railroad crossing. Any increase in traffic to the at-grade crossing by this project needs to be evaluated for potential impacts to safety and hazards.

In general, the major types of impacts to consider are collisions between trains and vehicles, and between trains and pedestrians. Measures to reduce adverse impacts to rail safety need to be considered. General categories of such measures include:

- Improvements to warning devices at existing highway-rail crossings
- Installation of additional warning devices
- Improvements to traffic signaling at intersections adjacent to crossings, e.g., traffic preemption
- Installation of median separation to prevent vehicles from driving around railroad crossing gates
- Prohibition of parking within 100 feet of crossings to improve the visibility of warning devices and approaching trains
- Installation of pedestrian-specific warning devices, channelization and sidewalks
- Construction of pull out lanes for buses and vehicles transporting hazardous materials

- Installation of vandal-resistant fencing or walls to limit the access of pedestrians onto the railroad right -of-way
- Elimination of driveways near crossings
- Increased enforcement of traffic laws at crossings
- Rail safety awareness programs to educate the public about the hazards of highway-rail grade crossings.

Commission approval is required to modify an existing highway-rail crossing or to construct a new crossing.

If you have any questions, please feel free to contact me at (916) 928-2515 or atm@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "David Stewart". The signature is stylized with a large, sweeping flourish at the end.

David Stewart, Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

24 December 2013

Dana Allen
City of Sacramento
300 Richards Boulevard
Sacramento, CA 95811

CERTIFIED MAIL
7012 2210 0002 1419 6813

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, MCKINLEY VILLAGE (P0-086) PROJECT, SCH NO. 2008082049, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 12 November 2013 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the McKinley Village P0-086) Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements

If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

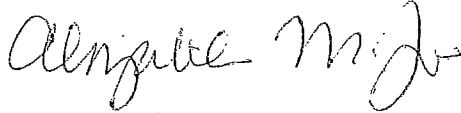
For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

If you have questions regarding these comments, please contact me at (916) 464-4684 or tcleak@waterboards.ca.gov.



to Trevor Cleak
Environmental Scientist

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



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

31 December 2013

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

DRAFT ENVIRONMENTAL IMPACT REPORT, MCKINLEY VILLAGE RESIDENTIAL DEVELOPMENT PROPOSAL, SACRAMENTO COUNTY

Central Valley Water Board Title 27 permitting staff has reviewed the November 2013 Draft Environmental Impact Report (EIR) for the McKinley Village Project prepared by Dudek Associates for the City of Sacramento (the City) under CEQA regulations. The 328-unit residential development project would be constructed on a 49-acre parcel of privately-owned land immediately south of the closed 28th Street Landfill. The parcel is bounded by the Capital City (Business 80) freeway to the north and the Union Pacific railroad line to the south. The parcel is accessible only by the A Street bridge, which connects to the landfill site. Our comments are as follows:

1. Various sections of the report may unnecessarily repeat information already described. Groundwater monitoring results, for example, are described on Pages 4.4-9 and then repeated on Pages 4.4-15 and 4.4-42. Gas information design and monitoring results are also repeated multiple times. The City might consider consolidating each topic into a single section and then cross-referencing as necessary. The description of groundwater quality information should be located in Section 4.5 (Hydrology, Water Quality and Drainage), not Section 4.4 (Public Hazards and Safety).

The report also appears to jump from one topic to another. The City might consider reorganizing/re-ordering such information. For example, a basic site description and background should be provided before other details such as monitoring well locations and adjacent land uses. See Page 4.4.2.

2. The report should specifically address whether the project site was ever operated as a burn dump and how such determination was made (e.g., boring log descriptions, soil samples, SWIS data base search). Indirect evidence provided in the report as to the absence of solid waste disposal (e.g., 2006 geotechnical investigation) does not preclude the possibility that waste was burned.
3. On Page 4.4-39, the report notes that the two groundwater monitoring wells (C-11S and C-11D) and six landfill gas monitoring probes on the northern perimeter of the site will be

relocated for the project. Relocation of the wells should occur prior to project construction in accordance with Central Valley Water Board staff and LEA approvals.

4. As noted in a 12 November 2013 Central Valley Water Board staff inspection report (copy enclosed), current waste discharge requirements (WDRs) Order No. R5-2004-0039 for the 28th Street Landfill does not require monitoring of landfill soil gas probes for volatile organic compounds (VOCs). Future revised WDRs for the landfill may require VOC monitoring of one or more of the offsite gas probes along the project perimeter.
5. On Page 4.4.12, the report states:

Although VOCs in groundwater and methane in soil gas have been detected on the site and along the southern boundary of the landfill . . . these conditions do not "represent a limitation to residential development" as long as the landfill is maintained by the City in accordance with local, state, and federal requirements to control and monitor groundwater and methane (see Appendix K).

The report should consider the possibility that noncompliance with the landfill WDRs could potentially result in offsite impacts and the need for further corrective action and/or monitoring. The report should address what mitigation measures will be incorporated into the project to address such contingency. At a minimum, the project should be compatible with the reasonably foreseeable release scenario approved for landfill corrective action financial assurances under Title 27 (e.g., gas release). See WDR Finding 51.

6. Separate comments on the project may be provided by other Central Valley Water Board program staff.

Central Valley Water Board staff appreciates the opportunity to comment on the Draft EIR for the McKinley Village project. If you have any questions, please feel free to contact me at (916) 464-4641 or by email at jmoody@waterboards.ca.gov.


JOHN MOODY
Water Resources Control Engineer
Title 27 Permitting and Mines

Enclosure

cc w/o enclosure:

Gino Yekta, CalRecycle, Sacramento
John Lewis, Sacramento County Environmental Management Department, Sacramento
Lisa Jameson, Sacramento County, Environmental Management Department, Sacramento
Steve Harriman, City of Sacramento Department of Utilities, Sacramento
Ambrose McCready, SCS Engineers, Sacramento
Ryan Fong, River Rock Investment Group, Sacramento
Randolf Brandt, Geosyntec, Oakland
Nickolas Targ, Holland & Knight, San Francisco

**DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY**

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027
P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

January 9, 2013

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

**SUBJECT: MCKINLEY VILLAGE PROJECT (P08-806)
DRAFT ENVIRONMENTAL IMPACT REPORT - SCH 2008082049**

Dear Ms. Allen:

The California Department of Resources Recycling and Recovery (CalRecycle) has received the Draft Environmental Impact Report (DEIR) for the McKinley Village Project (Project). The DEIR evaluates the environmental impacts of the proposed Project which includes a 328-unit residential development along with parks and a neighborhood recreation center on an approximately 48.75-acre site.

CalRecycle is an agency, along with the State and Regional Water Quality Control Boards (RWQCB), responsible for the regulation and oversight of solid waste handling and disposal by implementing both State and Federal standards, including Subtitle D of the Resource Conservation and Recovery Act (RCRA). CalRecycle concentrates its expertise on the non-water quality issues with landfills including landfill gas. CalRecycle has expertise relative to solid waste and environmental, public health and safety issues associated with land uses on or near solid waste facilities including landfills. CalRecycle works with and through local agencies that act as the Solid Waste Local Enforcement Agency (LEA).

The Project is located within the City of Sacramento limits northeast of downtown Sacramento along Interstate 80 and north of the Union Pacific Railroad lines, east of Alhambra Boulevard, and west of Lanatt Street. The American River is located approximately 0.25 mile north and east of the Project site. Furthermore, the Project is located within 250 feet of the closed City of Sacramento 28th Street Landfill, a landfill (disposal site) operated and maintained by the City of Sacramento and regulated under the authority of Title 27 of the California Code of Regulations (27 CCR).

CalRecycle staff has focused our review of the DEIR on Chapter 4.4 (Hazards and Public Safety) and provides the following general and specific comments.

General Comments

Development Criteria: As reported in the DEIR, landfill gas has previously been detected from monitoring wells located at the landfill boundary. Pursuant to 27 CCR, the concentration of landfill gas at the compliance wells is required to be kept under the regulatory threshold of 5% methane by volume (27 CCR 20921[a][2]). State standards also required that the concentration of methane shall be less than 1.25% by volume in on-site structures (27 CCR 20921[a][1]).



Current CalRecycle regulations prescribe standards for construction of structures on closed landfill sites that are within 1,000 feet of a disposal area (27 CCR 21190[g]). These standards do not apply to structures on adjacent parcels. The regulation does not prohibit construction of structures, but does contain standards that are designed to protect the public health and safety from landfill gas.

While the disposal site operator is required to control landfill gas from migrating off site at concentrations that are dangerous to public health and safety, landfill gas control measures are not always 100% effective. Landfill gas control facilities can be idled periodically for routine maintenance and infrequently for major (and/or minor) repairs. Furthermore, the control facilities can become inoperable as a result of causal events. Additionally, gas migration can occur even during normal, non-upset gas control operations. CalRecycle has seen situations where onsite monitoring and controls have not been fully effective in detecting and/or controlling landfill gas migration. Some examples where landfill gas has migrated off-site toward adjacent residential development even though a gas control system was functioning include: Canyon Park Landfill and Mission Canyon Landfill, Los Angeles County; Pleasanton Landfill, Alameda County; and Sparks-Rains Landfill and Newport Dump No. 1, Orange County.

Therefore, in general, regardless of the current effectiveness of any landfill gas control and/or monitoring system, CalRecycle staff usually recommends that the property boundary of any landfill include a 1,000-foot buffer zone around the disposal area. However, we realize that because of development potential, especially in urban areas, this is not often a likely scenario.

The DEIR indicates that project consultants have stated that the landfill methane does not represent a limitation to residential development as long as the landfill is maintained by the City in accordance with requirements to control methane (DEIR pp. 4.4-12, 4.4-15, 4.4-21 and 4.4-40). These statements imply that methane gas migration can occur (and be considered a hazard) if not adequately controlled. As stated above, gas migration can occur regardless of the current effectiveness of the landfill gas monitoring and control system.

Because landfill gas generated within the landfill has had and will continue to have the opportunity to migrate into other properties, landfill gas has the potential to cause harm by creating hazardous and explosive environments. Therefore, as an additional backup safety measure, CalRecycle recommends that as a condition of development approval, any enclosed structure (i.e., residence or other public use structure) within 1,000 feet of the landfill footprint be required to comply with the standards similar to those contained in 27 CCR 21190(g) (e.g., barrier layer, venting, in-structure alarms, etc.). A copy of 27 CCR 21190(g) is attached to this letter for your reference.

Methane Standard: The regulatory standard for methane concentration at a landfill boundary is the lower explosive limit (LEL) of 5% by volume in air. However, the regulatory standard (both State and Federal) for on-site structures is 1.25% by volume in air. Since methane is an explosive hazard at 5%, the lower 1.25% level should be used to determine potential impacts to future residents especially since methane can accumulate and reach higher concentrations.

Project Impacts on the Landfill: Because of the proposed residential development, it is possible that the landfill will need to increase monitoring frequency and/or install additional monitoring wells as a protection measure. Furthermore, although the prescriptive methane compliance standard at the landfill property boundary is 5% by volume in air, because of the proposed residential development and the lower structure standard for methane, the landfill may have to implement corrective actions at lower monitoring readings than 5% at the property boundary

should the levels pose a significant threat to nearby development. The project also includes improvements to A Street which passes through the landfill. Any improvements to the road should not impede the City's maintenance of the landfill.

These improvements may require revisions to the landfill closure and postclosure maintenance plans and approvals from CalRecycle, LEA, and RWQCB. The project proponent and the City should consult with the LEA regarding these activities.

Specific Comments

1. *Section 4.4.4 Project-Specific Impacts and Mitigation Measures 4.4-2 (Page 4.4-39)*: The DEIR states that the replacement gas monitoring wells on the project property (Lennane wells) will be constructed in accordance with the DTSC Advisory on Active Soil Gas Investigations. The DTSC Advisory focus is not for long-term monitoring of potential off-site gas migration. Since the gas monitoring wells are considered part of the landfill gas monitoring program, the wells need to be constructed pursuant to standards contained in 27 CCR 20923 *et seq.* The proposed location and design needs to be submitted to the LEA for approval with concurrence by CalRecycle.
2. *Section 4.4.5 Sources Cited (Page 4.4-50)*: The following two documents are attributed to CalRecycle:
 - a. CalRecycle, 2013a. Closed Disposal Site Inspection Report (188) for the Sacramento City Landfill located at 28th and A Streets, Sacramento, 95816, July 11, 2013.
 - b. CalRecycle, 2013b. Closed Disposal Site Inspection Report (188) for the Sacramento City Landfill located at 28th and A Streets, Sacramento, 95816, July 26, 2013.

Please note that both documents are inspection reports that were prepared by the County of Sacramento, Department of Environmental Management, acting as the LEA, utilizing a form developed by CalRecycle. These two documents are the product of Sacramento County and should be attributed as such.

Thank you for the opportunity to review the DEIR. Should you have any questions or comments concerning the above matter, please contact Mr. Michael Wochnick or me at (916) 341-6289 or (916) 341-6320, respectively. Alternatively, CalRecycle staff may be reached by email at michael.wochnick@calrecycle.ca.gov or wes.mindermann@calrecycle.ca.gov.

Sincerely,



Wes Mindermann, P.E.
Supervising Waste Management Engineer
Engineering Support Branch

Attachment

cc: Jon Lewis, Sacramento County Environmental Management Department
John Moody, Central Valley Regional Water Quality Control Board, Sacramento
Steve Harriman, City of Sacramento Department of General Services

ATTACHMENT

27 CCR 21190. CIWMB - Postclosure Land Use

(g) All on site construction (*sic* structures) within 1,000 feet of the boundary of any disposal area shall be designed and constructed in accordance with the following, or in accordance with an equivalent design which will prevent gas migration into the building, unless an exemption has been issued:

- (1) a geomembrane or equivalent system with low permeability to landfill gas shall be installed between the concrete floor slab of the building and subgrade;
- (2) a permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade or slab;
- (3) a geotextile filter shall be utilized to prevent the introduction of fines into the permeable layer;
- (4) perforated venting pipes shall be installed within the permeable layer, and shall be designed to operate without clogging;
- (5) the venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system;
- (6) automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected; and
- (7) periodic methane gas monitoring shall be conducted inside all buildings and underground utilities in accordance with Article 6, of Subchapter 4 of this chapter (section 20920 et seq.).



January 10, 2014

BOARD MEMBERS

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

Via Email: dallen@cityofsacramento.org

RE: Draft Environmental Impact Report (DEIR) for the McKinley Village Project

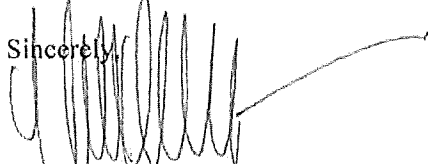
Dear Ms. Allen:

We have reviewed the DEIR for the McKinley Village Project and we note the discussion of the California High-Speed Rail Authority's (Authority) potential alignment for access to a high-speed rail station in downtown Sacramento in Chapter 2 "Project Description" of the report. In November 2005, the Authority certified the Final Program EIR/EIS and approved the High-Speed Train System Program for California. The statewide program included the identification and analysis of a preferred alignment for the high-speed rail service to the Sacramento station. Since that time, the Authority has discussed the proposed high-speed rail alignment alternatives with City of Sacramento representatives and has commenced analysis of potential alternatives for refined high-speed rail alignments and placement of ancillary facilities in the vicinity of the McKinley Village Project site. I would appreciate if the City would continue to keep the high-speed rail project in mind as analysis of the development project moves forward.

We look forward to continuing coordination with the City of Sacramento on our respective projects.

Please visit our website at <http://www.cahighspeedrail.ca.gov> for additional project information. Please contact me at (916) 403-6934 or mark.mcloughlin@hsr.ca.gov if you have any questions.

Sincerely,


Mark A. McLoughlin
Director of Environmental Services

EDMUND G. BROWN JR.
GOVERNOR



cc: Ben Tripousis, Northern California Regional Director, California High-Speed Rail Authority