Appendix B NOP Scoping Comment Letters





STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH





Notice of Preparation

June 26, 2015

To:

Reviewing Agencies

Re:

Railyards Specific Plan Update, Kaiser Medical Center and MLS Stadium

SCH# 2006032058

Attached for your review and comment is the Notice of Preparation (NOP) for the Railyards Specific Plan Update, Kaiser Medical Center and MLS Stadium draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Tom Buford City of Sacramento 300 Richards Boulevard, 3rd Floor Sacramento, CA 95816

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan

Director, State Clearinghouse

Attachments cc: Lead Agency

Document Details Report State Clearinghouse Data Base

SCH# 2006032058

Project Title Railyards Specific Plan Update, Kaiser Medical Center and MLS Stadium

Lead Agency Sacramento, City of

Type NOP Notice of Preparation

Description The project would amend the development densities provided in the Railyards Specific Plan; approve a

Fax

Medical Facility; and approve a stadium for a Major League Soccer franchise.

Lead Agency Contact

Name Tom Buford

Agency City of Sacramento

Phone 916 808 7931

email

Address 300 Richards Boulevard, 3rd Floor

City Sacramento State CA Zip 95816

Project Location

County Sacramento

City Sacramento

Region

Cross Streets East of the Sacramento River and I-5, south of North B Street

Lat / Long

Parcel No. 002-0010-056

Township Range Section Base

Proximity to:

Highways 1-5

Airports

Railways UPRR

Waterways Sacramento River, American River

Schools

Agencies

Land Use Vacant / Railyards Specific Planning District / Urban Center High and Urban Neighborhood High

Density, Parks and Recreation

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood

Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services;

Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian; Growth

Inducing; Landuse; Cumulative Effects

Reviewing Resources Agency; Central Valley Flood Protection Board; Office of Historic Preservation; Department

of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 2;

Native American Heritage Commission; Public Utilities Commission; State Lands Commission; California Highway Patrol; Caltrans, District 3 S; Air Resources Board; Department of Toxic

Substances Control; Regional Water Quality Control Bd., Region 5 (Sacramento)

Date Received 06/26/2015 Start of Review 06/26/2015 End of Review 07/27/2015

Note: Blanks in data fields result from insufficient information provided by lead agency.

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

20#06032058

Project Title: Railyards Spec	cific Plan Update, Kaiser M	edical Center and	MLS Stadiu	ım	
Lead Agency: City of Sacrame	ento		Contact	Person: Tom	Buford, Senior Planner
Mailing Address: 300 Richards	Boulevard, Third Floor		Phone:	916-808-793	1
		Zip: 95816	County:	: Sacramento)
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Project Location: County: Sa	cramento	City/Nearest (Community: S	Sacramento	
Cross Streets: East of the Sacr					
Longitude/Latitude (degrees, min	nutes and seconds):°	′″N/		" W Total	Acres: 244
Assessor's Parcel No.: 002-0010		a			ge: Base:
Within 2 Miles: State Hwy#	Interstate 5				n River
Airports:		Railways: Unior	n Pacific	Scho	ols:
Document Type:				,	
CEQA: NOP	☐ Draft EIR	NEPA:	☐ NOI	Other:	☐ Joint Document
Early Cons	Supplement/Subsequent l		☐ EA		Final Document
	(Prior SCH No.) 200603205		Draft E		Other:
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Local Action Type:				CEIVE	
General Plan Update		Rezon	е (Annexation
General Plan Amendment		Prezor	ie JU	N 26 2015	Redevelopment
General Plan Element	Planned Unit Developr		16		Coastal Permit
Community Plan	Site Plan	∐ Land I		division, etc.)	
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Development Type:					
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Project Issues Discussed in	Document:				
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Agricultural Land		Schools/\overline Schools/\over			Water Quality
Air Quality	Forest Land/Fire Hazar				▼ Water Supply/Groundwater
Archeological/Historical		⊠ Sewer Ca			▼ Wetland/Riparian
☒ Biological Resources	☐ Minerals		ion/Compact	ion/Grading	ĭ Growth Inducement
☐ Coastal Zone	➤ Noise	🗵 Solid Wa			■ Land Use
☑ Drainage/Absorption	➤ Population/Housing Ba	llance 🗵 Toxic/Ha	zardous		
☐ Economic/Jobs	➤ Public Services/Faciliti	es 🔀 Traffic/C	irculation		Other:
			100 000 100 100 1		
Present Land Use/Zoning/G	-				
Vacant/Railyards Specific Pl	anning District/Urban Cent	er High and Urbar	n Neighborh	ood High De	nsity, Parks and Recreation
Project Description: (pleas	e use a separate page if n	ecessary)			
The project would amend the	ne development densities p	provided in the Ra	ilyards Spec	ific Plan; appi	rove a Medical Facility; and

approve a stadium for a Major League Soccer franchise

OES (Office of Emergency

Native American Heritage

Marcia Scully

Public Utilities

Debbie Treadway

Comm.

Commission

Supervisor

NOP Distribution List

Resources Agency Nadell Gayou Dept. of Boating & Waterways Denise Peterson California Coastal Commission Elizabeth A. Fuchs Elizabeth A. Fuchs Colorado River Board Lisa Johansen Elizabeth Carpenter California Energy Commission Elizabeth Carpenter California Energy Commission Eric Knight Cal Fire Dan Foster Cal Fire Danes Herota Section California Department of Resources, Recycling & Recovery Sue O'Leary	Fish	. Fish	Jeff Tist	Cha Fish Julik	d Fist Les Hab		Hab Hab Prog	Heir Inyo Con	Georg Marin Other Depa	<u> </u>	\$ 0 T	Sec. Defi		se <u>Independer</u> Commissio
	Resources Agency	Resources Agency Nadell Gayou		California Coastal Commission Elizabeth A. Fuchs	Colorado River Boar Lisa Johansen	Dept. of Conservatio	California Energy Commission Eric Knight Cal Fire	Dan Foster Central Valley Flood Protection Board James Herota	Office of Historic Preservation Ron Parsons	Dept of Parks & Recreation Environmental Stewardship Section	Resources, Recyclin Recovery Sue O'Leary	Dept. of W Resources Resources Nadell Gay	Fish and Game Depart. of Fish & Wil	Environmental Service Division

7	Fish & Wildlife Region 1E Laurie Harnsberger	
	Fish & Wildlife Region 2 Jeff Drongesen	
	Fish & Wildlife Region 3 Charles Armor	
	Fish & Wildlife Region 4 Julie Vance	
2	Fish & Wildlife Region 5 Leslie Newton-Reed Habitat Conservation Program	
	Fish & Wildlife Region 6 Tiffany Ellis Habitat Conservation Program	
	Fish & Wildlife Region 6 I/M Heidi Calvert Inyo/Mono, Habitat Conservation Program	Age
	Dept. of Fish & Wildlife M George Isaac Marine Region	

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Ferri Pencovic

California Highway Patrol

Office of Special Projects

Suzann Ikeuchi

Dept. of Transportation

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t. of General Services ironmental Services a Garbeff

Caltrans, District 2

Marcelino Gonzalez

Caltrans, District 1

Rex Jackman

ta Stewardship an Samsam

Eric Federicks - South

Caltrans, District 3

Susan Zanchi - North

Caltrans, District 4

Patricia Maurice

Ising & Comm. Dev. 2A Coordinator sing Policy Division

Caltrans, District 5

Larry Newland

Caltrans, District 6

Michael Navarro

Delta Protection Commission Michael Machado ns, Boards

CASTORICA BENEVICE

Caltrans, District 10 Caltrans, District 12 Caltrans, District 11 Caltrans, District 9 Caltrans, District 8 Maureen Ei Harake Jacob Armstrong Gayle Rosander **Mark Roberts** Fom Dumas

Cal EPA

State Lands Commission

Guangyu Wang

Restoration

Jennifer Deleong

Santa Monica Bay

Air Resources Board

Tahoe Regional Planning Agency (TRPA)

Cathi Slaminski All Other Projects

Caltrans - Division of

State Transportation

ency CalSTA

Cherry Jacques

Caltrans - Planning

HQ LD-IGR

Philip Crimmins

Aeronautics

State Water Resources Cont Division of Financial Assistanc

State Water Resources Cont Board

Division of Water Rights Phil Crader Board 1

Dept. of Toxic Substances CEQA Tracking Center

Department of Pesticide Regulation CEQA Coordinator Last Updated 6/23/2015

Last Updaleo 6/25/2016

Caltrans, District 7 Dianna Watson

2006032058 Regional Water Oriality Control

Caltrans, District 8 Roberts	Board (RWQCB)
Caltrans, District 9 Rosander	RWQCB 1
Caltrans, District 10 Dumas	North Coast Region (1)
Caltrans, District 11 o Armstrong	Environmental Document Coordinator
Caltrans, District 12 een Ei Harake	San Francisco Bay Region (2) RWQCB 3 Central Coast Region (3)
	RWQCB 4 Teresa Rodgers To Annales Region (4)
rrces Board ther Projects	RWQCB 5S Central Valley Region (5)
Transportation Projects Nesamani Kalandiyur	RWQCB 5F Central Valley Region (5) Fresno Branch Office
Industrial/Energy Projects Mike Tollstrup	RWQCB 5R Central Valley Region (5)
State Water Resources Control Board Regional Programs Unit Division of Financial Assistance	Redding Branch Office RWQCB 6 Lahontan Region (6)
State Water Resources Control Board Karen Larsen – Asst Deputy Division of Drinking Water	Lahontan Region (6) Victorville Branch Office
State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality	Colorado River Basin Region (7) RWQCB 8 Santa Ana Region (8)
State Water Resouces Control Board Phil Crader Division of Water Rights	San Diego Region (9)
Dept. of Toxic Substances Control CEQA Tracking Center	Other
Department of Pesticide Regulation CEQA Coordinator	
	Сопѕегνапсу



Divisions

Administration
Maintenance & Operations
Engineering & Planning

County of Sacramento

July 6, 2015

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

SUBJECT: COMMENTS ON THE NOTICE OF PREPARATION OF A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT AND SCOPING MEETING FOR THE RAILYARDS SPECIFIC PLAN UPDATE, KAISER PERMANENTE MEDICAL CENTER, AND MLS STADIUM

Mr. Buford:

The Sacramento County Department of Transportation has received the Notice of Preparation (NOP) of a Subsequent Environmental Impact Report (EIR) for this Project, dated June 26, 2015. We appreciate the opportunity to the review this NOP and have no comments to offer at this time. We would ask that the City send us a copy of the EIR for review when it becomes available.

Should you have any questions, please feel free to contact me at (916) 874-6291.

Sincerely,

Matthew G. Darrow, PE, TE, PTOE.

Senior Transportation Engineer Department of Transportation

MGD

Cc:

Mike Penrose, DOT Dan Shoeman, DOT Dean Blank, DOT Kamal Atwal, DOT Juliette Robinson, DCD



July 9, 2015

nento Regional County Sanitation District

Main Office

10060 Goethe Road Sacramento, CA 95827-3553

Tel: 916.876.6000 Fax: 916.876.6160

Treatment Plant

8521 Laguna Station Road Elk Grove, CA 95758-9550

Tel: 916.875.9000 Fax: 916.875.9068

Board of Directors

Representing:

County of Sacramento

County of Yolo

City of Citrus Heights

City of Elk Grove

City of Folsom

City of Rancho Cordova

City of Sacramento

City of West Sacramento

Prabhakar Somavarapu

District Engineer

Ruben Robles

Director of Operations

Christoph Dobson

Director of Policy & Planning

Karen Stoyanowski

Director of Internal Services

Joseph Maestretti

Chief Financial Officer

Claudia Goss

Public Affairs Manager

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

Mr. Tom Buford, Senior Planner

Subject: Notice of Preparation of a Subsequent Environmental Impact Report and Scoping Meeting for the Railyards Specific Plan Update, Kaiser Permanente Medical Center and Major League Soccer Stadium

Dear Mr. Buford:

Sacramento Regional County Sanitation District (Regional San) has the following comments regarding the Environmental Impact Report for the Railyards Specific Plan Update, Kaiser Permanente Medical Center and Major League Soccer Stadium project.

Regional San is not a land-use authority. Projects identified within Regional San planning documents are based on growth projections provided by land-use authorities. Sewer studies will need to be completed to assess the impacts of any project that has the potential to increase flow demands. Onsite and offsite impacts associated with constructing sanitary sewer facilities to provide service to the subject project should be included in this environmental impact report.

Customers receiving service from Regional San are responsible for rates and fees outlined within the latest Regional San ordinances. Fees for connecting to the sewer system are set up to recover the capital investment of sewer and treatment facilities that serves new customers. The Regional San ordinance is located on the Regional San website at http://www.srcsd.com/ordinances.php.

Local sanitary sewer service for the proposed project site will be provided by the City of Sacramento's local sewer collection system. Ultimate conveyance to the Sacramento Regional Wastewater Treatment Plant (SRWTP) for treatment and disposal will be provided via Sump 2/2A and the Regional San City Interceptor system. Cumulative impacts of the proposed project will need to be quantified by the project proponents via a sewer master plan to ensure wet and dry weather capacity limitations within Sump 2/2A and the City Interceptor system are not exceeded.

On March 13, 2013, Regional San approved the Wastewater Operating Agreement between Regional San and the City of Sacramento. The following flow limitations are outlined in this agreement:

Service Area	Flow Rate (MGD)
Combined Flows from Sump 2 and Sump 2A	60
Combined flows from Sumps 2, 2A, 21, 55, and 119	98
Total to City Interceptor of combined flows from Sumps 2, 2A, 21, 55, 119, and five trunk connections	108.5

Mr. Tom Buford July 9, 2015 Page 2

The SRWTP provides secondary treatment using an activated sludge process. Incoming wastewater flows through mechanical bar screens through a primary sedimentation process. This allows most of the heavy organic solids to settle to the bottom of the tanks. These solids are later delivered to the digesters. Next, oxygen is added to the wastewater to grow naturally occurring microscopic organisms, which consume the organic particles in the wastewater. These organisms eventually settle on the bottom of the secondary clarifiers. Clean water pours off the top of these clarifiers and is chlorinated, removing any pathogens or other harmful organisms that may still exist. Chlorine disinfection occurs while the wastewater travels through a two mile "outfall" pipeline to the Sacramento River, near the town of Freeport, California. Before entering the river, sulfur dioxide is added to neutralize the chlorine. The design of the SRWTP and collection system was balanced to have SRWTP facilities accommodate some of the wet weather flows while minimizing idle SRWTP facilities during dry weather. The SRWTP was designed to accommodate some wet weather flows while the storage basins and interceptors were designed to accommodate the remaining wet weather flows.

A NPDES Discharge Permit was issued to Regional San by the Central Valley Regional Water Quality Control Board (Water Board) in December 2010. In adopting the new Discharge Permit, the Water Board required Regional San to meet significantly more restrictive treatment levels over its current levels. Regional San believed that many of these new conditions go beyond what is reasonable and necessary to protect the environment, and appealed the permit decision to the State Water Resources Control Board (State Board). In December 2012, the State Board issued an Order that effectively upheld the Permit. As a result, Regional San filed litigation in California Superior Court. Regional San and the Water Board agreed to a partial settlement in October 2013 to address several issues and a final settlement on the remaining issues were heard by the Water Board in August 2014. Regional San began the necessary activities, studies and projects to meet the permit conditions. The new treatment facilities to achieve the permit and settlement requirements must be completed by May 2021 for ammonia and nitrate and May 2023 for the pathogen requirements

Regional San currently owns and operates a 5-mgd Water Reclamation (WRF) that has been producing Title 22 tertiary recycled since 2003. The WRF is located within the SRWTP property in Elk Grove. A portion of the recycled water is used by Regional San at the SRWTP and the rest is wholesaled to the Sacramento County Water Agency (SCWA). SCWA retails the recycled water, primarily for landscape irrigation use, to select customers in the City of Elk Grove. It should be noted that Regional San currently does not have any planned facilities that could provide recycled water to the proposed project or its vicinity. Additionally, Regional San is not a water purveyor and any potential use of recycled water in the project area must be coordinated between the key stakeholders, e.g. land use jurisdictions, water purveyors, users, and the recycled water producers.

If you have any questions regarding these comments, please contact me at 916-876-6104.

Sincerely,

Robb Armstrong

Regional San Development Services & Plan Check

cc: SASD Development Services

Sarenna Moore - Policy & Planning-Long Range Planning



CITY HALL

1110 West Capitol Avenue West Sacramento, CA 95691

City Council (916) 617-4500

City Manager's Office City Clerk Early Learning Services Information Technology (916) 617-4500 Economic Development (916) 617-4535

Tom Buford, Senior Planner City of Sacramento, Community Development Department 300 Richards Boulevard, Third Floor Sacramento, CA 95811

Re: Railyards Specific Plan Update Subsequent EIR Notice of Preparation

Community Development Planning/Development Engineering (916) 617-4645 Housing/Community Investment

Housing/Community (916) 617-4555 Building (916) 617-4683 Code Enforcement (916) 617-4925

Public Works
Administration
Transportation
Engineering
Flood Protection
(916) 617-4850
Environmental Services
(916) 617-4590
Utility Billing

Administrative Services

Finance (916) 617-4575 Human Resources (916) 617-4567

(916) 617-4589

Parks & Recreation Administration (916) 617-4620 Recreation Center 2801 Jefferson Blvd. West Sacramento, CA 95691 (916) 617-4770 Community Center 1075 West Capitol Ave. West Sacramento, CA 95691 (916) 617-5320

FIRE

2040 Lake Washington Blvd. West Sacramento, CA 95691 (916) 617-4600

POLICE

550 Jefferson Boulevard West Sacramento, CA 95605 (916) 617-4900

PUBLIC WORKS

Operations 1951 South River Road West Sacramento, CA 95691 (916) 617-4850 Dear Mr. Buford:

July 28, 2015

The City of West Sacramento is encouraged to see interest in the Railyards. The project will certainly have benefits of regional significance. To assist the City of Sacramento in preparing the SEIR for the Railyards Specific Plan update, the City of West Sacramento has the following comments and recommendations:

- 1. The SEIR should evaluate the proposed Downtown/Riverfront Streetcar network and its future operation. The starter line (Route A) for this regional circulator will provide connections between West Sacramento's Civic Center, the Sacramento Intermodal Transportation Facility, the State Capitol, the convention center, and Midtown. Future streetcar lines include Route E that will connect across the new C Street/Railyards Bridge with West Sacramento's Washington District and Bridge District neighborhoods. The streetcar project could both mitigate traffic and air quality impacts and could extend the economic benefit of the Railyards far beyond its localized impact by providing riders an easier method to connect destinations.
- 2. The cumulative analysis should account for planned development as described in the Washington Specific Plan and the Bridge District Specific Plan.
- The EIR should consider the plans for new bridges over the Sacramento River including the Broadway Bridge and the C Street/Railyards Bridge.
- 4. The following intersections should be studied employing West Sacramento level of service thresholds and include any air quality impacts that may result:
 - a) 3rd & Tower Bridge Gateway
 - b) 5th & Tower Bridge Gateway
 - c) Garden St & Tower Bridge Gateway
 - d) 3rd & C Streets
 - e) 3rd & E Streets

- f) 3rd & F Streets
- g) 3rd & G Streets
- h) Bridge St & South River Rd
- i) Jefferson Blvd & US
- j) 5th & C Streets



- 5. The proposed projects in the Railyards may have an impact on the following bridges, freeways and regional facilities. Potential impacts to these facilities should be examined in the traffic analysis and the risk of upset and air quality sections of the EIR:
 - a) Tower Bridge Operations
 - b) I Street Bridge Operations
 - c) Interstate 5 Operations and Bus/Carpool Lanes Project.

- d) US 50 Operations
- e) RT & YCTD Transit Services
- f) Raley Field Operations
- 6. The recreation chapter of the EIR should address potential impacts to the West Sacramento Riverwalk Park resulting from additional demand from increased employment in the Railyards.

The City of West Sacramento believes there are a number of projects and programmatic solutions that could improve traffic, risk of upset air quality and other transportation impacts in the Railyards, the downtown core, and West Sacramento. We recommend that the EIR analyze the following potential solutions to impacts that may be created by the project:

- 1. <u>Joint Comprehensive Parking Program</u>-The two cities have started talks regarding shared services for parking in the downtown core. Implementation of this shared service would provide better coordination for parking which would lessen impacts arising from Railyards development on traffic and parking operations.
- 2. Regional Bike Share the regional bike share project, of which both West Sacramento and Sacramento are members could reduce vehicle trips to and from the Railyards if bike share facilities are included as part of the projects.
- 3. <u>I Street Bridge Replacement Project</u> Both cities have jointly obtained funding for the replacement of the I Street Bridge. This project could improve access between the project area and West Sacramento.
- 4. <u>Bi-City Traffic Signal Synchronization/Connection</u>- both cities employ automated traffic management systems. Coordination of these traffic signals could lessen traffic impacts created by Railyards development.
- 5. <u>Emergency Evacuation Plan Coordination</u>- emergency evacuation plans for both cities have traditionally not been coordinated. Given the location of large public facilities (Raley Field, the ESC, MLS stadium), emergency evacuation plans should be coordinated to prevent problems in the event of a disaster in the downtown core area including West Sacramento.

Thank you for sending the NOP to the City of West Sacramento. We appreciate the opportunity to provide early input on the project. If you have any questions, please contact me or David Tilley at (916) 617-4645 or via email at charlineh@cityofwestsacramento.org or davidt@cityofwestsacramento.org.

Sincerely,

Charline R. Hamilton

Community Development Director

Cc: Martin Tuttle, City Manager

Denix Anbiah, Public Works Director



July 28, 2015

Tom Buford, Senior Planner
City of Sacramento, Community Development Department
Environmental Planning Services
300 Richards Boulevard, Third Floor
Sacramento, CA 95811-0218
tbuford@cityofsacramento.org

Subject: Notice of Preparation (NOP) of a Subsequent Environmental Impact Report (SEIR) for the Railyards Specific Plan (RSP) Update, Kaiser Permanente Medical Center, and MLS Stadium (P14-012)

Dear Mr. Buford:

Thank you for the opportunity to comment on the subject NOP. We are excited to see progress on developing the Railyards project area and look forward to it being a state of the art neighborhood for comfortable and friendly bicycle access for all ages and abilities. Both Kaiser Permanente and the Sacramento Republic Football Club, the intended occupant of the MLS Stadium, have already demonstrated their interest and commitment to fostering bicycling as a healthy and sustainable form of modern transportation.

The proposed project will cause a significant adverse effect on the environment if it will not adequately provide access by bicycle. Adequacy of bicycle access happens in three ways:

Adequate bicycle parking. The project must comply with Sacramento's requirements for short-term and long-term bicycle parking. The Medical Center is proposed to have 1.2 million square feet which will require 180 long-term bicycle parking spaces for employees or long-term patients and 60 short-term spaces for short-term visitors. We encourage the project to go beyond the basic requirements by providing bicycle parking that is noteworthy as an amenity of the project and therefore a selling point to potential employees and customers that is consistent with Kaiser's health care mission. For example, the Medical Center should include a state-of-the-art "bike station" to serve employees and customers with a secure, indoor, 24-hr accessible bike-parking facility; such a facility might also provide tools and supplies for minor bike repairs and servicing (e.g. flat repairs, tire inflation). The Sacramento Republic has provided valet parking for bicycles at its games since its first game in 2014. As many as 400 attendees have ridden bikes to games at its remote Cal Expo location. A much higher proportion of attendees at the proposed MLS Stadium will be expected to ride bicycles given its more accessible location to large residential areas. Therefore, the MLS Stadium should include a design for a bike parking operation that will hold at least 1,000 bikes, possible distributed among two or more locations.

Adequate bicycle access within the project. Because the proposed Medical Center and MLS Stadium each will occupy multiple city blocks, internal access by bicycle from the roadway network to bicycle parking locations will be critical. We request that bikeways be provided as part of the internal promenades through the sites. These bikeways should be delineated by pavement-surface treatments to show cyclists where they should ride to avoid conflicts with pedestrians. Signage can be used to guide cyclists to long-term bike parking and to exits from the project to the surrounding roadway network.

Adequate bicycle access to the project sites. The project sites will be located on roadways to be developed through the Railyards. It will be critical for the proposed project to ensure it provides access for all ages and abilities of cyclists to and along these roadways from key rider sources like the Sacramento River Parkway, midtown Sacramento, and East Sacramento. Because of the high number of cyclists expected to ride to MLS soccer games, either Class 1 (bike trails) or Class 4 (protected bike lanes) should be provided to the stadium site to prevent conflicts between high vehicle volumes and high bicycling volumes.

The subject EIR must address these 3 dimensions of adequate bicycle access.

SABA works to ensure that bicycling is safe, convenient, and desirable for everyday transportation. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient, and least congesting form of transportation.

Thank you for considering our comments.

Sincerely,

Jordan Lang

Project Analyst

CC: Paul Philley, SMAQMD (pphilley@airquality.org)

Ed Cox, City of Sacramento Alternative Modes Coordinator (ecox@cityofsacramento.org)





Matthew Rodriquez
Secretary for
Environmental Protection

Department of Toxic Substances Control



Barbara A. Lee, Director 8800 Cal Center Drive Sacramento, California 95826-3200

July 29, 2015

Via E-Mail Only

Tom Buford, TBuford@cityofsacramento.org

COMMENTS ON CITY OF SACRAMENTO'S JUNE 26, 2015 NOTICE OF PREPARATION FOR A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT FOR THE RAILYARDS SPECIFIC PLAN UPDATE

Dear Mr. Buford:

Department of Toxic Substances Control (DTSC) has received and reviewed the June 26, 2015 Notice of Preparation (NOP) for the Railyards Specific Plan Update (RSPU) Subsequent Environmental Impact Report (SEIR). The RSPU SEIR would update the December 11, 2007 Railyards Specific Plan (RSP) Environmental Impact Report (EIR). The RSPU SEIR will also address the environmental effects of a proposed Kaiser Permanente Medical Center and Major League Soccer Stadium which would be constructed within the Railyards.

DTSC appreciates the opportunity to review and comment on the NOP and is eager to participate and provide information to facilitate the implementation of the California Environmental Quality Act process. Close communication between all responsible agencies during preparation of the RSPU SEIR will be essential to assure the document is complete and up to date. Below are points that should be discussed in the RSPU SEIR.

Scope of RSPU SEIR

As you are probably aware, DTSC is providing lead regulatory oversight for the cleanup of contaminated soil, soil gas, and groundwater at the Railyards. DTSC's review on the scope of the RSPU SEIR focused on the aspects related to the historical and ongoing remedial measures at the Railyards. The sections in the RSPU SEIR titled "Hazards and Hazardous Materials" and "Hydrology and Water Quality" should consider and discuss Railyards remediation issues.

Tom Buford July 29, 2015 Page 2 of 3

The RSP EIR included a Mitigation Monitoring Program that became ordinance. The RSPU SEIR should continue this program for construction of new development and infrastructure. DTSC will focus on mitigations regarding hazardous materials.

Additionally, the RSP EIR and associated documents mention a Tri-Party Memorandum of Understanding (MOU) that was developed between DTSC, City of Sacramento, and S. Thomas Enterprises of Sacramento, LLC (STES). Since STES' loss of the Railyards by way of foreclosure resulted in the MOU being ineffective, discussion of the MOU needs to be updated in the RSPU SEIR.

Cleanup at the Railyards

The soil cleanup for the following Study Areas have been completed, with the exception of inaccessible areas: Sacramento Station, Northern Shops, Central Corridor, Car Shop Nine, and Lagoon. Inaccessible areas include soil beneath the former platforms in Sacramento Station and beneath Track 150 east of 7th Street in Car Shop Nine that will be remediated when they become accessible; soil near the Central Shops border in Northern Shops that will be remediated this year; and soil beneath a water line in Northern Shops that will remain inaccessible. Soil remediation will be certified complete when the required land use covenants (LUCs) are recorded.

The soil remedies for the Central Shops and Lagoon Northwest Corner Study Areas are ongoing. The soil remedy for the Manufactured Gas Plant Study Area has not yet been selected.

The final groundwater remedies for South Plume and Lagoon Groundwater Study Areas have not been completed, but interim remedial measures have been in place. The South Plume remedy is currently being designed and implemented, and the Lagoon Groundwater remedy is being evaluated.

The Railyards was not remediated to levels protective for unrestricted land use, so recordation of a LUC is required to limit land use and require exposure controls and mitigation measures to protect human health and the environment. DTSC is working with the current Railyards owner to record a LUC.

Examples of exposure controls include having a compliant layer/barrier and signage to prevent access to native soil. Also, a soil and groundwater management plan would be required prior to disturbance of either media to identify procedures for safe and appropriate handling. Lastly, vapor intrusion mitigation measures would be required as part of new construction of enclosed structures unless data is provided to show they aren't needed.

Tom Buford July 29, 2015 Page 3 of 3

Medical Center and Stadium

The Medical Center is approximately 18 acres in an area bounded by Bercut Street, South Park Street, 5th Street, and Railyards Boulevard. This area is in the Northern Shops and Lagoon Study Areas, located above the Lagoon Groundwater Study Area. The soil there has been cleaned up, and groundwater remediation is ongoing.

The Stadium is approximately 12-14.5 acres in an area bounded by 8th Street, North B Street, 10th Street, and Railyards Boulevard. This area is in the Lagoon and Car Shop Nine Study Areas, and located above the Lagoon Groundwater and South Plume Study Areas. The soil there has been remediated, except for under Track 150, and groundwater remediation is ongoing.

DTSC looks forward to receiving the RSPU SEIR for a complete review of the specific points related to remediation of contamination at the site. As the RSPU SEIR project proceeds, and if you have any questions regarding site investigation and remediation, please contact me at (916) 255-3601 or Ruth.Cayabyab@dtsc.ca.gov.

Sincerely,

Ruth Cayabyab

Ruth Cayatyat

Brownfields and Environmental Restoration Program

CC: Brad Shelton, P.G., Brad.Shelton@waterboards.ca.gov Fernando Amador, P.E., Fernando.Amador@dtsc.ca.gov Karl Kurka, KKurka@cityofsacramento.org



Eric Gill, Financial Secretary-Treasurer

Hernando Ramos Tan, President

Godfrey Maeshiro, Senior Vice-President

July 29, 2015

Tom Buford, Senior Planner City of Sacramento Community Development Department 300 Richards Blvd., Third Floor Sacramento, CA 95811

Re: Comments on Notice of Preparation of Subsequent Environmental Impact Report and Scoping Meeting for the Railyards Specific Plan Update

Please accept this response to the referenced Notice of Preparation of a Subsequent Environmental Impact Report (SEIR). Please **include the following contact as an interested party** to the distribution list to receive all updates and notifications for this Project:

Ivan Hou
Unite Here Local 5
1516 South King Street
Honolulu, HI 96826

Email: ihou@unitehere5.org

The City's SEIR should take a critical look at Kaiser Permanente's Medical Center proposal and ask if it will significantly advance Sacramento's healthcare industry. The Railyard site, based on the 2007 Railyards Specific Plan (RSP), may be better suited for other developments that diversify the city's economic activities. The 2007 RSP provided a cohesive plan for the site with commercial, retail and residential mixed uses. A medical and sports complex is an incongruent departure from the RSP. Alternative uses for the Railyard site should be a point of focus of the SEIR.

The Kaiser medical center is a zero-sum development. The medical center was reported to provide about the same number of jobs as the Morse Avenue facility it will replace¹. Kaiser wants to build this new facility a mere six and a half miles away from the old facility. The new location moves the medical facility further away from densely populated neighborhoods to the west. Sacramento will have one Kaiser hospital whether or not this development is approved. In fact, the City would probably benefit from more choice and competition if a *different* healthcare company built at the Railyard. Granting Kaiser the Railyard site is a lateral move for the City. In contrast, the Major League Soccer facility is at least a unique addition to the city's development mix.

¹ http://www.sacbee.com/news/business/article25986196.html

The SEIR should evaluate whether the assignment of Railyard acreage to build a Kaiser facility and sports stadium is the best use of the site and whether it will impact the City's ability to enhance the downtown and waterfront neighborhoods with the mixed uses described in the 2007 RSP, i.e. will the proposed facilities limit the viability of commercial, retail and residential mixed-use developments in the remainder of the site?

Kaiser's financial reserves should be incorporated into the SEIR's evaluation of alternative uses and mitigation actions. Kaiser is a tax-exempt organization but is immensely profitable. Much of Kaiser's profitability comes from taxpayers since many of Kaiser's members are public sector employees. CalPERS alone provide Kaiser with 500,000 members. Kaiser:

- held \$32.8 billion in unrestricted cash and investment reserves at the end of 2014;
- made \$3.1 billion in net income in 2014;
- averaged nearly \$2.5 billion in net income each year over the past five years;
- the CEO and Chairman earned \$10 million in 2012 while the board of directors received an average salary of \$220,000.

The money Kaiser spends each year for marketing, executive pay, capital projects and retained as net income is money not used for direct patient care. Indeed, Kaiser is in the midst of a ten year plan to spend \$30 billion on capital expenditure projects. Kaiser has the financial resources to implement a range of development plans including refurbishment of existing facilities. Negative impacts to Kaiser from City policy decisions that do not meet its organizational goals are minimized by its financial flexibility. The City should not be too focused on making Kaiser happy. The City should only commit to a Railyard Kaiser facility if it is the best use for the site that benefits the region for the long term, regardless of what Kaiser wants. The SEIR should take Kaiser's financial resources into account when evaluating alternative uses for the site and mitigation actions for environmental impacts.

Regards,

Ivan Hou Unite Here Local 5 1516 South King Street Honolulu, HI 96826 Tel: 808-941-2141 ext. 267

Email: ihou@unitehere5.org

CC:

Tom Buford via email Sacramento City Council



(916) 202-4815 - PO Box 162140, Sacramento CA 95816 - info@preservationsacramento.org - PreservationSacramento.org

July 30, 2015

Tom Buford, Senior Planner City of Sacramento Community Development Department 300 Richards Blvd, Third Floor Sacramento, CA 95811

RE: Railyards Specific Plan Notice of Preparation Response

The Board of Directors of Preservation Sacramento request that the City of Sacramento include the following items as areas within the scope of analysis of the SEIR proposed for the Railyards Specific Plan Update.

First, the Central Shops Historic District should be maintained and protected, with adjustments only as necessary to provide better circulation via relocation of Camille Avenue farther north, and inclusion of potential new construction in the former Transfer Table location west of the Paint Shop, in order to facilitate use of that large open space in the absence of the already removed eastern Transfer Table. We strongly encourage the city to require nomination of the Central Shops for listing in the National Register of Historic Places, as a potential mitigation method and to facilitate adaptive reuse of the historic Shops buildings.

Second, the proposed reduction of housing units in the Railyards from 12,000 to approximately 6,000 must be scrutinized for ways to minimize loss of proposed housing, including utilization of the ORMX zoned properties for new construction that combine office and employment center uses with residential floors. Sacramento's central city currently employs approximately 90,000 people, with a workforce population of only approximately 12,000. In order to avoid significant impacts to transportation networks via a loss of proposed housing, as much housing as possible should be retained in the revised plan. Significant reductions in proposed population density, coupled with increases in commercial space, could result in greatly increased traffic as people must commute to this new job center instead of living in close proximity to work. This means potential dramatic increases in vehicle miles traveled compared to the numbers provided in the original Railyards EIR.

Third, because this new neighborhood will require neighborhood-serving retail in order to avoid additional traffic impacts from residents leaving the neighborhood to perform regular shopping activities, commercial programming within the district should focus on neighborhood-serving retail, such as grocery stores, hardware, clothing, and other retail uses, rather than focusing on entertainment, dining and other commercial uses that do not satisfy basic needs for neighborhood residents. Another pressing neighborhood need is a site for educational facilities, as Sacramento's central city has only two elementary schools, no junior high or high schools or full-sized college campuses. Educational facilities provide employment while also filling a growing need for future downtown residents who wish to raise their families in the heart of the city. Failing to provide these facilities may also result in increased vehicle miles and resultant pollution impacts, as lack of these services means they must travel elsewhere to satisfy household needs and transport children to school.

William Burg, President, Preservation Sacramento Board of Directors

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE 2379 GATEWAY OAKS DRIVE, STE 150 – MS 19 SACRAMENTO, CA 95833 PHONE (916) 274-0635 FAX (916) 263-1796 TTY 711



July 30, 2015

032015-SAC-0097 03-SAC-5 / 24.02 SCH# 2006032058

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

Railyards Specific Plan Update (RSPU), Kaiser Medical Center (KMC) and Major League Soccer Stadium (MLSS) Project – Notice of Preparation (NOP) of a Subsequent Environmental Impact Report (SEIR)

Dear Mr. Buford:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The proposed RSPU includes construction of a 1.2 million square foot KMC, and a MLSS to house a new professional soccer team and up to 25,000 attendees at soccer games and other events. The proposed RSPU will also include refinements to the density and intensity of land uses within the Office/Residential Mixed Use, Residential/Commercial Mixed Use, and Residential Mixed Use zones. The project is located immediately north of downtown Sacramento on both sides of Interstate 5 (I-5), with I-5 providing direct freeway access to the project site via the Richards Blvd., I Street, and J Street interchanges. Due to the project's location, scale of development and potentially significant impacts to mainline I-5 and its interchanges (IC), Caltrans views the project as being of regional and interregional significance. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl. The following comments are based on the NOP.

Transportation, Traffic, and Parking

The second paragraph on page 4 of the NOP states that the ensuing SEIR will evaluate potential environmental issues regarding Transportation, Traffic, and Parking. Caltrans requests that evaluation include an analysis of local and State facilities within the project area to determine

Mr. Buford/ City of Sacramento, Community Development July 30, 2015 Page 2

potential operational impacts that may occur as a result of the implementation of the proposed project. The analysis must also include proposed improvements or suggestions to mitigate those potential impacts to the facilities. The study is to include, I-5, the I-5/Richards Blvd. IC, 7th St., State Route (SR) 160, 12th St., 16th St., and 10th St. The study should also include an existing-plus-project scenario, and future-plus-project scenario analyses.

Caltrans' concerns about potential mitigation for significant impacts that may be identified in the SEIR, to the State Highway System, could be addressed by payment to the I-5 Subregional Corridor Mitigation Program (SCMP). The SCMP would be a voluntary impact fee for new developments within the I-5 corridor between Elk Grove, downtown Sacramento and West Sacramento that would be used to construct a set of transportation improvements including very relevant projects like the American River Bridge Crossing, the Green Line extension, the Sacramento Streetcar, and the Richards Blvd. IC projects.

The SCMP would not encompass when a development would create significant impacts to intersections where freeway ramps meet local roadway, including Intersection level of service impacts; determining if traffic added by a development would cause off-ramp traffic to back-up onto the freeway mainline; and determining if the development would cause existing or future conditions to deteriorate to the point where there is potential for increased collisions.

Transportation Management Plan (TMP)

If it is determined that traffic restrictions and detours are needed on or affecting State highways, a TMP or construction Traffic Impact Study may be required of the developer for approval by Caltrans prior to construction. 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/engineering/mutcd/pdf/camutcd2014/Part6.pdf.

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.

Charles Laughlin
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 link below for more information. http://www.dot.ca.gov/hq/traffops/developserv/permits/.

Mr. Buford/ City of Sacramento, Community Development July 30, 2015 Page 3

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

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

Sincerely,
The peduciales

ERIC FREDERICKS, Branch Chief Regional Planning – South

c: Scott Morgan, State Clearinghouse



July 30, 2015

Tom Buford, Senior Planner City of Sacramento Community Development Department 300 Richards Blvd., Third Floor Sacramento, CA 95811

Subject: Notice of Preparation of a Subsequent Environmental Impact Report for the Railyards Specific Plan Update, Kaiser Permanente Medical Center, and MLS Stadium

Dear Mr. Buford,

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of a Subsequent Environmental Impact Report (SEIR) for the Railyards Specific Plan Update, Kaiser Permanente Medical Center, and MLS Stadium. SMUD is the primary energy provider for Sacramento County and the proposed project area. SMUD's vision is to empower our customers with solutions and options that increase energy efficiency, protect the environment, reduce global warming, and lower the cost to serve our region. As a Responsible Agency, SMUD aims to ensure that the proposed project limits the potential for significant environmental effects on SMUD facilities, employees, and customers.

It is our desire that the SEIR, the Railyards Specific Plan Update, Kaiser Permanente Medical Center, and MLS Stadium will acknowledge any project impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - https://www.smud.org/en/do-business-with-smud/documents/Guide-for-Transimssion-Encroachment.pdf. Some of these requirements include the following
 - https://www.smud.org/en/business/customer-service/support-andservices/documents/Underground-Structure-T007.pdf
- Utility line routing
- Electrical load needs/requirements
 - 1. Energy Center (central utility plant)
- Energy Efficiency
- Climate Change



SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed project. Please ensure that the information included in this response is conveyed to the project planners and the appropriate project proponents.

Environmental leadership is a core value of SMUD and we look forward to collaborating with you on this project. Again, we appreciate the opportunity to provide input on this NOP. If you have any questions regarding this letter, please contact Rob Ferrera, SMUD Environmental Specialist at rob.ferrera@smud.org.

Sincerely,

Rob Ferrera

Environmental Specialist
Environmental Management
Legislative & Regulatory Affairs
Sacramento Municipal Utility District

Cc: Rob Ferrera

Jose Bodipo-Memba Pat Durham Joseph Schofield Mike Wirsch Mike Deis



July 30, 2015

Tom Buford, Senior Planner
City of Sacramento Community Development Department
300 Richards Blvd., Third Floor
Sacramento, CA 95811
tbuford@cityofsacramento.org

RE: Railyards Specific Plan Update (SAC200500788)

Mr. Buford,

The Sacramento Metropolitan Air Quality Management District (The District) thanks the City of Sacramento for the opportunity to comment on the proposed project to modify the Railyards Specific Plan to include a hospital campus and soccer facility. The District is required by law to "represent the citizens of the Sacramento district in influencing the decisions of other public and private agencies whose actions may have an adverse impact on air quality within the Sacramento district." We offer our comments in that spirit.

Construction Emissions

Construction of the current specific plan is currently being done consistent with the Railyards Construction Mitigation Plan. Altering the land uses, tentative map, and zoning may result in more or less anticipated construction emissions. These emissions should be discussed, quantified, and disclosed in the manner described in Chapter 3 of the District's "CEQA Guide to Air Quality Assessment." If the anticipated emissions would vary significantly from the prior environmental document, the construction mitigation plan should be amended to account for the change.

With respect to greenhouse gas emissions generated from the construction of the project, these emissions should be discussed, quantified, and disclosed in the manner described in Chapter 6 of the District's "CEQA Guide to Air Quality Assessment." Per the guidance, the District recommends that GHG emissions be minimized during the

¹ California Health and Safety Code §40961

² http://www.airquality.org/ceqa/ceqaguideupdate.shtml

construction phase utilizing the District's "Guidance for Construction GHG Emissions Reductions."

Operational Criteria Emissions

The Railyards Specific Plan's Mitigation Monitoring and Reporting Plan (MMRP) required the adoption of an Air Quality Mitigation Plan (AQMP). The current AQMP incorporates 20 measures, and effectiveness of each measure was scaled based on the land uses and circulation plan anticipated in the original environmental documents. Changing the tentative map, zoning, land uses, and intensities may alter the effectiveness of the 20 measures incorporated in the current AQMP. The emissions from altering the project should be discussed, quantified, and disclosed in the manner described in Chapter 4 of the District's "CEQA Guide to Air Quality Assessment." If the effectiveness of the AQMP is degraded with the proposed changes, the City and proponents should work with the District to amend the AOMP to maintain current levels of effectiveness.

Greenhouse Gas Emissions

Operation of the project may result in an increase in Greenhouse Gas emissions. These emissions should be discussed, quantified, and disclosed in the manner described in Chapter 6 of the District's "CEQA Guide to Air Quality Assessment." The proponents should also discuss the project's consistency with existing Greenhouse Gas reduction plans, such as the Metropolitan Transportation Plan/Sustainable Communities Strategy, the California Air Resources Board Scoping Plan and the City of Sacramento Climate Action Plan.

Permitted and Unpermitted sources of Toxic Air Contaminants

The City should make a concerted effort to disclose potential TAC-related health impacts from locating sources of TAC emissions in close proximity to existing or future planned receptors, and utilizes best practices when locating receptors in close proximity to an existing or future planned source of TAC emissions. For example, proponents should be mindful of planning outdoor space at the hospital campus near Interstate 5, utilizing best practices in its design.

Permitted sources can be identified using ARB's Community Health Air Pollution Information System (CHAPIS) and supplemented using the EPA's Toxics Release Inventory Explorer search tools. For more information, refer to Chapter 5 of our CEQA Guide.

Additionally, the proposed project may require permits from the SMAMQD (Authority to Construct and Permit to Operate) due to equipment needed for the uses (such as back-

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³ http://www.airguality.org/cega/ceguguideupdate/Ch6ConstructionMitMeasures.pdf

⁴ http://www.airquality.org/ceqa/ceqaguideupdate.shtml

up generators and boilers at the Hospital Campus). The Environmental Document should discuss the impacts of these sources, and the District recommends proponents contact a permitting engineer in the Stationary Sources Division at (916) 874-4800.

Sustainable Modes Service to Soccer Facility

Sports and entertainment venues deserve special attention to ensure sustainable modes can handle peak loads from patrons. Bicycle valet, bus layover facilities, and expanded waiting areas at the light rail station should be considered in the transportation management plan to minimize vehicle miles traveled.

General comments

To summarize, the District requests that the City consider construction and operational emissions, as well as toxic air contaminants. All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling (916) 874-4800.

The SMAQMD thanks the City of Sacramento for the opportunity to comment on this project. If you have additional questions or require further assistance, please contact me at pphilley@airquality.org or (916) 874-4882.

Sincerely,

Paul Philley, AICP

Associate Air Quality Planner/Analyst Sacramento Metropolitan Air Quality Management District 777 12th Street, 3rd Floor

Sacramento, CA 95814

Attachment: Construction Mitigation (Basic and Enhanced)
Attachment: SMAQMD Rules & Regulations Statement

Basic Construction Emission Control Practices

BASIC CONSTRUCTION EMISSION CONTROL PRACTICES

The following practices are considered feasible for controlling fugitive dust from a construction site. Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel powered equipment. The California Air Resources Board enforces the idling limitations.

 Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.

 Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Lead agencies may add these emission control practices as Conditions of Approval (COA) or include in a Mitigation Monitoring and Reporting Program (MMRP).

ENHANCED EXHAUST CONTROL PRACTICES

- The project representative shall submit to the lead agency and District a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of the construction project.
 - The inventory shall include the horsepower rating, engine model year, and projected hours of use for each piece of equipment.
 - The project representative shall provide the anticipated construction timeline including start date, and name and phone number of the project manager and on-site foreman.
 - This information shall be submitted at least 4 business days prior to the use of subject heavy-duty off-road equipment.
 - The District's <u>Equipment List</u> Form can be used to submit this information.
 - The inventory shall be updated and submitted monthly throughout the duration of the project, except that an inventory shall not be required for any 30-day period in which no construction activity occurs.
- 2. The project representative shall provide a plan for approval by the lead agency and District demonstrating that the heavy-duty off-road vehicles (50 horsepower or more) to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project wide fleet-average 20% NO $_{\rm X}$ reduction and 45% particulate reduction compared to the most recent California Air Resources Board (ARB) fleet average.
 - This plan shall be submitted in conjunction with the equipment inventory.
 - Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available.
 - The District's <u>Construction Mitigation Calculator</u> can be used to identify an equipment fleet that achieves this reduction.
- 3. The project representative shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40% opacity for more than three minutes in any one hour.
 - Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately.

Enhanced Exhaust Control Practices

- Non-compliant equipment will be documented and a summary provided to the lead agency and District monthly.
- A visual survey of all in-operation equipment shall be made at least weekly.
- A monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey.
- The District and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this mitigation shall supercede other District, state or federal rules or regulations.

SMAQMD Rules & Regulations Statement (revised 3/12)

The following statement is recommended as standard condition of approval or construction document language for **all** development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):

All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the SMAQMD early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration. Other general types of uses that require a permit include, but are not limited to dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 417: Wood Burning Appliances. This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Naturally Occurring Asbestos: The developer or contractor is required to notify SMAQMD of earth moving projects, greater than 1 acre in size in areas "Moderately Likely to Contain Asbestos" within eastern Sacramento County. Asbestos Airborne Toxic Control Measures, Section 93105 & 93106 contain specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

THE RIVER DISTRICT



August 14, 2015

Via Electronic Mail tbuford@cityofsacramento.org

Tom Buford, Senior Planner City of Sacramento Community Development Department 300 Richards Blvd., Third Floor Sacramento, CA 95811

Re: Comment Letter, Railyards Specific Plan Update, Subsequent Environmental Impact Report

Dear Mr. Buford:

Thank you for the opportunity to provide comments on the California Environmental Quality Act (CEQA) scoping documents for the Subsequent Environmental Impact Report for the Railyards Specific Plan Update, Kaiser Permanente Medical Center and MLS Stadium ("SEIR").

The SEIR will consider the impacts of a Kaiser Permanente Medical Center and Major League Soccer ("MLS") Stadium, both of which are proposed to be constructed within the Railyards Specific Plan area ("RSP"). The River District Business Association ("Association") is a private, non-profit business association charged with managing and promoting programs to strengthen the economic and cultural well being of the River District Property and Business Improvement District area and the River District Special Planning District. The RSP area is located immediately south of the River District; therefore, the Association's members may be affected by impacts related to the proposed Medical Center and MLS Stadium.

The Association supports the Medical Center or the MLS Stadium. These facilities may, however, create greater and/or different impacts than were evaluated under the 2007 RSP EIR. The Association provides the following comments in the spirit of assuring that these impacts are considered in the SEIR.

1. Transportation and Traffic

The MLS Stadium is likely to create more traffic congestion, and have a greater impact on circulation, than the land uses that were anticipated in the 2007 EIR, especially during peak periods for Stadium events. The SEIR should address impacts related to:

- a) Greater vehicle traffic on North 10th Street and North B Street;
- b) Greater pedestrian and bicycle traffic on North 10th Street and North B Street:
- c) Additional bicycle traffic and pedestrian traffic to/from transit stations and bus stops;
- d) Large vehicles (trucks, vans, etc.) delivering equipment and supplies for special events taking place at the Stadium;

e) Larger numbers of vehicles on local streets at game times, and at times of special events at the Stadium.

The SEIR should also consider circulation options for most efficiently bringing the increased number of vehicles to and from the adjacent major freeways, in particular Interstate 5 and State Highway 160.

2. Public Services

The SEIR should consider the appropriate level of public services necessary to address large crowds of people arriving at, and leaving, the Stadium during events.

3. Parking / Urban Design

The SEIR should analyze the design and scale of any proposed parking facilities, including appropriate circulation for vehicles moving to and from the entry and exit points of the parking facilities.

4. <u>Light and Glare</u>

The SEIR should consider impacts related to stadium signage and lighting.

5. Noise

The Stadium may create situations when excessive noise emanates from the site, especially during games and other events that were not studied under the 2007 RSP EIR. There should be appropriate analysis to assure that noise does not negatively impact businesses and residents in the area.

6. Other Comments: The Secondary Levee

The Association believes that removal of the secondary levee that forms the northern boundary between the RSP area and the River District will create greater connectivity within the area, thus allowing for more efficient movement of pedestrians and vehicles. The Association supports removal of the secondary levee.

The Association appreciates the opportunity to submit these comments on the SEIR. I would be happy to meet with City staff to discuss any of these comments. Please do not hesitate to contact me with any questions or concerns.

Very truly yours,

Patty Kleinknecht

Patty Leinkneint

Executive Director, The River District