

## RESPONSE TO COMMENTS

This Response to Comments document contains comments received during the public review period of the Stockton and T Street Mixed-Use Project (proposed project) Sustainable Communities Environmental Assessment Initial Study (SCEA IS). The proposed project would remove the existing 120,000-square foot (sf) vacant office building (formerly AT&T) and associated parking lot and subdivide the property for construction of a mixed-use residential and commercial development. The proposed project includes a 214-unit, five-story, multi-family housing complex with ground floor commercial and a parking garage on the corner of Stockton Boulevard and T Street. In addition, the proposed project includes construction of approximately 24 single-family homes between S Street and U.S. Highway 50 (US 50).

The proposed project qualifies as a Transit Priority Project (TPP) under Senate Bill (SB) 375, as the project falls within the planning assumption that the Sacramento Area Council of Governments (SACOG) projected for the Center and Corridor Communities in the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). Accordingly, a SCEA IS was prepared for the proposed project pursuant to Section 21155.2 of the Public Resources Code. The SCEA IS for the proposed project was prepared in March 2015. The City of Sacramento, as lead agency, released the SCEA IS for public review beginning on March 20, 2015 and ending on April 20, 2015 pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15105. The SCEA IS and supporting documents were made available at the City of Sacramento Planning Department at 300 Richards Blvd, Third Floor, Sacramento, CA 95811 and online at the City of Sacramento website. According to CEQA Guidelines Sections 15073 and 15074, the lead agency must consider the comments received during consultation and review periods together with the SCEA IS. However, the CEQA Guidelines do not require the lead agency to send responses directly to commenters. Unlike within an Environmental Impact Report, comments received on an IS are not required to be attached to the IS, nor must the lead agency make specific written responses to public agencies. In addition, comments on an IS are typically responded to in the Staff Report prepared for project hearings. Nevertheless, the City of Sacramento as the lead agency has chosen to provide responses to all of the comments received during the public review process for the proposed project SCEA IS.

### LIST OF COMMENTERS

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The City of Sacramento received nine comment letters on the SCEA IS for the proposed project during the public comment period. The comment letters were authored by the following State agency, local agency, and residents:

- |          |   |
|----------|---|
| Letter 1 | Trevor Cleak, Central Valley Regional Water Quality Control Board |
| Letter 2 | Marlon Flournoy, California Department of Transportation          |
| Letter 3 | Robb Armstrong, Sacramento Regional County Sanitation District    |
| Letter 4 | Catherine Hernandez, Resident                                     |
| Letter 5 | Karin Lovato, Resident  |
| Letter 6 | Gabe Tierney, Resident  |

Letter 7      Roxanne Gould, Resident  
Letter 8      Debby J Henry, Resident  
Letter 9      Scott Morgan, Office of Planning and Research State Clearinghouse and Planning  
                  Unit

## **RESPONSE TO COMMENTS**

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The Response to Comments section includes responses to the comment letters submitted regarding the proposed project. Each comment letter received has been numbered at the top and bracketed to indicate how the letter has been divided into individual comments. Each comment is given a number with the letter number appearing first, followed by the comment number. For example, the first comment in Letter 1 would have the following format: 1-1. To the extent that any revisions to the SCEA IS text are required based on the comments received, new text is identified as double underlined and deleted text is shown as ~~struck through~~.

Letter 1



Central Valley Regional Water Quality Control Board

13 April 2015

Scott Johnson  
City of Sacramento  
300 Richards Blvd, Third Floor  
Sacramento, CA 95811

CERTIFIED MAIL  
7014 2870 0000 7535 8256

**COMMENTS TO REQUEST FOR REVIEW FOR THE SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT, STOCKTON AND T STREET MIXED-USE PROJECT, SCH# 2015032066, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 20 March 2015 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Sustainable Communities Environment Assessment* for the Stockton and T Street Mixed-Use 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](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

1-1

**Letter 1  
cont'd**

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13 April 2015

1-2

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

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

1-3

**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](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

1-4

**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.

<sup>1</sup> 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.

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1-5

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

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

1-6

**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](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml).

1-7

**Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at:  
[http://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/app\\_approval/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml); or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory

**Letter 1  
cont'd**

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1-7  
Cont'd

Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

**Low or Limited Threat General NPDES Permit**

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

1-8

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](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](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](mailto:tcleak@waterboards.ca.gov).



Trevor Cleak  
Environmental Scientist

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

**LETTER 1: TREVOR CLEAK, CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD**

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**Response to Comment 1-1**

As described on page 72 of the SCEA IS, within Section VII, Hydrology and Water Quality, the applicant is required to obtain an NPDES Construction General Permit and prepare a project-specific SWPPP. The permits will incorporate BMPs in order to prevent, or reduce to the greatest feasible extent, adverse impacts to water quality from erosion and sedimentation.

**Response to Comment 1-2**

As described on page 73 of the SCEA IS, within Section VII, Hydrology and Water Quality, the Stormwater Quality Improvement Plan (SQIP) outlines the priorities, key elements, strategies, and evaluation methods of the City's Stormwater Management program. The SQIP was prepared as part of the Sacramento County area-wide NPDES MS4 Permit. In addition, the Sacramento City Code Section 13.08.145 requires that when a property contributes drainage to the storm drain system or to the City Combined Sewer System (CSS), all storm water and surface runoff drainage impacts resulting from the improvement or development must be fully mitigated to ensure that the improvement or development does not affect the function of the storm drain system or CSS. As discussed on page 78 of the SCEA IS, conformance with City regulations and permit requirements along with implementation of BMPs would ensure that the proposed project would result in a less-than-significant impact related to stormwater absorption rates, discharges, flows, and water quality.

**Response to Comment 1-3**

The comment is noted; however, the proposed project does not include industrial uses.

**Response to Comment 1-4**

As discussed on pages 41 and 42 of the SCEA IS, within Section II, Biological Resources, "the existing vegetation on or in the vicinity of the project site predominantly consists of ornamental trees and landscaping, as well as ruderal vegetation. Water features are not present on the project site. Accordingly, riparian habitat, wetlands, or any other sensitive natural community do not exist on the project site." Therefore, the proposed project would not involve the discharge of dredged or fill materials into any navigable waters or wetlands or any disturbance of waters of the U.S., and a Clean Water Act Section 404 or 401 Permit would not be required.

**Response to Comment 1-5**

See Comment 1-4 above.

**Response to Comment 1-6**

See Comment 1-4 above.

**Response to Comment 1-7**

The comment is noted; however, the proposed project does not include commercial irrigated agriculture.

**Response to Comment 1-8**

Dewatering is not anticipated to be required as a result of construction of the proposed project. However, should groundwater be encountered during construction and dewatering become necessary, as the commenter correctly observes, the applicant would be required to seek the proper NPDES permit for dewatering activities.

## Letter 2

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 3 – SACRAMENTO AREA OFFICE  
703 B STREET  
MARYSVILLE, CA 95901  
PHONE (530) 741-4337  
FAX (530) 741-5346  
TTY 711



*Serious drought.  
Help save water!*

April 20, 2015

032015-SAC-0057  
03-SAC-50 / R.659  
P 14-042  
SCH 2015032066

Mr. Scott Johnson  
Community Development Department  
City of Sacramento  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811

### **Stockton and T Street Mixed-Use Project – Draft Sustainable Communities Environmental Assessment (SCEA)**

Dear Mr. Johnson:

Thank you for including the California Department of Transportation (Caltrans) in the draft SCEA review process for the Stockton and T Street Mixed-Use Project. Caltrans sent comments for the original and revised project applications on November 12, 2014 and March 6, 2015. Since transmission of the original comments the proposed project has undergone various revisions. This project is the first in the Sacramento region to use a streamlined review for Transit Priority Projects consistent with Sacramento Area Council of Government's Sustainable Communities Strategy. Currently, the proposed project is for the construction of a five-story, approximately 215,000 square foot multi-family housing structure with commercial retail uses, a parking garage, and 214 residential units. The proposed project also includes construction of 24-new, single-family homes between S Street and United States (US) Highway 50. The proposed project requires approval for a 21-lot tentative map, and a site plan and design review. The project site is located in the northeast quadrant of the Stockton Boulevard and T Street intersection on a 4.9-acre lot that is immediately adjacent US 50 mainline and US 50 / Stockton Boulevard on-ramp.

Caltrans new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development project 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.

*"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability"*

**Letter 2  
cont'd**

Mr. Scott Johnson / City of Sacramento, Community Development Department  
April 20, 2015  
Page 2

***Pedestrian Improvements***

Caltrans commends the project proponent for improving pedestrian access to and from the project site.

***Potential Impacts to US Highway (US) 50***

As stated in the SCEA, this project did not provide an analysis of the State Highway System (SHS) since: "the proposed project qualifies as a Transit Priority Project (TPP) under Senate Bill (SB) 375. Environmental documents for TPPs are not required to reference, describe or discuss: 1) growth inducing impacts, 2) impacts from car and light duty truck trips on climate change or regional transportation network, or a 3) reduced density alternative to the project."

However, SB 375 went on to state, "Nothing in the foregoing relieves any project from a requirement to comply with any conditions, exactions, or fees for the mitigation of the project's impacts on the structure, safety, or operations of the regional transportation network or local streets and roads." Additionally, Public Resources Code, section 21155.3, allows for the City to adopt mitigation specifically for transit priority projects.

2-1

Given the project's proximity to the Stockton Boulevard / eastbound US 50 on-ramp, and based on field observations, Caltrans has concerns that the proposed project could result in operational impacts to the SHS that potentially increase the potential for collisions. Specifically, Caltrans is concerned that there will be queuing. Therefore, Caltrans requests that the lead agency clarify whether there will be any potential queuing impacts on the US 50 eastbound off ramp at 34<sup>th</sup> Street or the US 50 westbound off ramp at Stockton Boulevard that could impact travelers on mainline US 50. The left turn storage on the 34<sup>th</sup> Street off ramp is limited. Queuing could be expected to back up to the freeway gore area and interfere with mainline traffic flow. In addition, increased vehicular traffic volumes could impact pedestrian, bicycle, and vehicular travel through these intersections resulting in additional safety concerns. If operations are impacted, especially if those impacts potentially increase the potential for collisions, then the City should consider conditions or fees that mitigate these impacts.

***Access Management***

2-2

Based on the information in the SCEA, it is difficult to determine the spacing of driveways in relation to the US 50 Stockton Boulevard eastbound on ramp. The Caltrans Highway Design Manual (HDM), Chapter 500 - Traffic Interchanges has minimum spacing requirements for freeway ramp entrances. This project may be in conflict with those standards. Caltrans requests more detailed site plans, and/or a meeting to discuss access management within the proposed project's vicinity.

Consistent with the HDM, Chapter 500, Caltrans requests the lead agency construct a barrier that prevents left turns from Stockton Boulevard into the project site driveway and avoid potential safety impacts.

*"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability"*

**Letter 2  
cont'd**

Mr. Scott Johnson / City of Sacramento, Community Development Department  
April 20, 2015  
Page 3

2-3

***Hydraulics***

On page 72 of the SCEA under "Project Specific Impact Discussion", the first paragraph begins, "The proposed project site is currently developed and contains impervious services. Therefore, all the stormwater that fall on the project site flows to existing drains and feeds into the existing City CSS. Post construction, the proposed project would include impervious services and the storm drainage would continue to flow into the City CSS." Caltrans requests the lead agency clarify whether the pre-project impervious surface area equates to the post-project impervious surface area. Caltrans also requests the lead agency clarify whether the runoff from post-project conditions discharge into the same drainage system as pre-project conditions, and whether runoff peak flows are approximately equal. If any of the proposed changes to the project site impact State facilities, those impacts should be mitigated.

2-4

***Right of Way (ROW)***

The proposed project will require that a boundary survey and ROW resolution be prepared and reviewed by Caltrans. Monument perpetuation may also be required per the Land Surveyors Act in the form of a record of survey. Also, there may be utility conflicts along US 50 adjacent to the Caltrans ROW boundary.

Caltrans appreciates the project proponent actively coordinating with us to resolve any issues related to potential construction of a new soundwall along our ROW.

2-5

***Construction Traffic Management Plan (TMP) Consultation***

Caltrans would like to review the Construction TMP. The Caltrans TMP consultation contact is District 3 Traffic Manager Bob Mcnew. He can be reached at (916) 859-7978.

2-6

***Encroachment Permit***

Please be advised that any work or traffic control that would encroach onto the State 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 Charles Laughlin in the Caltrans, District 3, Office of Permits located at 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 uniform resource locator for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

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 Eric Fredericks at 916-274-0635 or by email at: [eric.fredericks@dot.ca.gov](mailto:eric.fredericks@dot.ca.gov).

**Letter 2  
cont'd**

Mr. Scott Johnson / City of Sacramento, Community Development Department  
April 20, 2015  
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Sincerely,



MARLON FLOURNOY  
Deputy District Director  
Division of Planning and Local Assistance

c: Scott Morgan, State Clearinghouse

**LETTER 2: MARLON FLOURNOY, CALIFORNIA DEPARTMENT OF TRANSPORTATION**

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**Response to Comment 2-1**

The comment expresses concerns that the project could cause operational impacts to the State highway system, which could increase the potential for collisions, specifically from queuing at the EB US 50 off-ramp at 34<sup>th</sup> Street and WB US 50 off-ramp at Stockton Boulevard. The following analyses were conducted to address these potential concerns:

- *US 50 WB Off-ramp at Stockton Boulevard* – This off-ramp consists of a single off-ramp lane that extends 1,430 feet from the off-ramp gore point to the beginning of the shared left/through and dedicated right-turn lanes, which each consist of 210 feet of storage. This configuration can accommodate a maximum queue of 73 vehicles (assuming 25 feet per vehicle) without spilling back onto the US 50 mainline. Queuing observations were conducted at this off-ramp on Tuesday, October 21, 2014. Between 7:45 and 8:00 AM, a maximum queue of 15 left/through vehicles and 20 right-turn vehicles were observed. Between 5:15 and 5:30 PM, a maximum queue of 18 left/through vehicles and 21 right-turn vehicles were observed. According to the *Final Transportation Impact Study for the Stockton Boulevard/T Street Mixed-Use Project* (Fehr & Peers, January 2015), the proposed project would add 3 AM peak hour trips and 10 PM peak hour trips to the westbound off-ramp left-turn movement. During the AM and PM peak hours, the maximum off-ramp queue is 35 to 39 vehicles, which is far less than the available storage of 73 vehicles. Since the project's contribution of trips to this off-ramp is modest (3 AM peak hour and 10 PM peak hour trips), vehicles would not spill back onto WB US 50.
- *US 50 EB Off-ramp at 34<sup>th</sup> Street* – This two-lane off-ramp consists of one off-ramp lane from EB US 50 and one off-ramp lane from the US 50/SR 99/Capital City Freeway SB to EB connector ramp. This off-ramp features dedicated left-turn and right-turn lanes that extend back from 34<sup>th</sup> Street a distance of 550 feet (at which point the two connector ramps meet). This configuration can accommodate a maximum queue of 44 vehicles (assuming 25 feet per vehicle) without blocking the ability for motorists to weave from one off-ramp into the other turn lane (e.g., US 50 EB off-ramp weave into the right-turn lane). Queuing observations were conducted at this off-ramp on Wednesday, April 22 and Thursday, April 23, 2015. During the AM peak hour, a maximum queue of 15 left-turn vehicles and 2 right-turn vehicles were observed. During the PM peak hour, a maximum queue of 6 left-turn vehicles and 3 right-turn vehicles were observed. According to the *Final Transportation Impact Study for the Stockton Boulevard/T Street Mixed-Use Project* (Fehr & Peers, January 2015), the proposed project would add 7 AM peak hour trips and 22 PM peak hour trips to the eastbound off-ramp left-turn movement. Thus, during the more critical AM peak hour, the project would add, on average, one vehicle every eight minutes. The project would increase the maximum left-turn queue from 15 to 16 vehicles during the AM peak hour. Since a maximum queue of 22 vehicles can be accommodated in the left-turn lane, a queuing problem would not occur.

Thus, operations at each of the off-ramps would not be adversely affected by the proposed project. Accordingly, it is not necessary for the City to consider conditions of approval, fees, or other measures to address a potential queuing concern.

### **Response to Comment 2-2**

The comment requests more details regarding the spacing of the project's driveway on Stockton Boulevard from the existing eastbound US 50 on-ramp. The proposed driveway would be constructed in the same location as an existing driveway that served by the currently vacant office building on the site. It is situated approximately 100 feet north of T Street and 200 feet south of the triangular island located at the beginning of the eastbound diagonal on-ramp. Chapter 500 of the *Highway Design Manual* (Caltrans, 2013) specifies that right-turn only access may be permitted at a distance of at least 200 feet beyond the ramp intersection. A narrow median is being constructed on Stockton Boulevard in the driveway vicinity to physically prohibit left-turns at the project driveway. By virtue of the project generating fewer trips and installing a raised median on Stockton Boulevard, vehicular access along Stockton Boulevard would be improved when compared to the existing condition.

### **Response to Comment 2-3**

The proposed project would use the existing stormwater drainage system for the site. For analysis purposes, the amount of impervious surface area under the proposed conditions was assumed to be equal to the existing conditions. However, because the single-family portion of the proposed project would include pervious yard areas, the impervious surface area under the proposed project would likely be less than the existing conditions. The proposed project would not involve any changes to State facilities.

The existing site is 99% impervious (211,833 sf impervious/214,333 sf total). The proposed project is 80% impervious (173,333 sf impervious/214,333 sf total). The project is proposing to increase the pervious area from 1% to 20% (2,500 sf to 41,000 sf). Runoff from the post project conditions will continue to drain to the city combined system. No runoff from the post project is proposed to drain to or impact state facilities.

### **Response to Comment 2-4**

Comment noted. The comment does not address the adequacy of the SCEA IS, but provides that Caltrans review and coordination may be required. The City and applicant are aware of the additional Caltrans review requirements and will coordinate with Caltrans.

### **Response to Comment 2-5**

The commenter's request a copy of the Construction Traffic Management Plan will be forwarded to the applicant and the appropriate City of Sacramento Departments responsible for reviewing and approving the Construction Traffic Management Plan.

### **Response to Comment 2-6**

The project applicant would obtain an encroachment permit for any work or traffic control that would encroach onto State Right of Way.

**Letter 3**



March 24, 2015

Scott Johnson, Associate Planner  
 City of Sacramento, Community Development  
 Environmental Planning Services  
 300 Richards Blvd., 3<sup>rd</sup> Floor  
 Sacramento, CA 95811

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**Subject: Notice of Availability/Intent to Adopt – Sustainable Communities Environmental Assessment (SCEA) for the Stockton and T Street Project (P14-042)**

Dear Mr. Johnson:

Sacramento Regional County Sanitation District (Regional San) has the following comments regarding the Sustainable Communities Environmental Assessment for the Stockton and T Street Project.

3-1

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.

3-2

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>.

3-3

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 to ensure wet and dry weather capacity limitations within Sump 2/2A and the City Interceptor system are not exceeded.

3-4

On March 13, 2013, Regional San approved the Wastewater Operating Agreement between the Sacramento Regional County Sanitation District 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

**Letter 3  
cont'd**

Mr. Scott Johnson  
March 24, 2015  
Page 2

**3-4  
cont'd**

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: Sarena Moore – Policy & Planning

**LETTER 3: ROBB ARMSTRONG, SACRAMENTO REGIONAL COUNTY SANITATION DISTRICT**

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**Response to Comment 3-1**

The comment has been noted. The potential impacts of the proposed project, both on-site and off-site, have been addressed throughout the SCEA IS. The commenter is directed to page 127 of the SCEA, within the Utilities and Services Systems section, for a discussion regarding sewer services.

**Response to Comment 3-2**

The comment has been noted; however, it does not specifically address the adequacy of the SCEA IS.

**Response to Comment 3-3**

The comment provides useful and relevant information regarding the wastewater treatment services available to the project site by the Regional Sanitation District.

The CSS collects and conveys wastewater and stormwater to two pump station facilities operated by the City: Sump Pump Station 1/1A and Sump Pump Station 2/2A. SRCSD reimburses the City for certain costs the City incurs to operate and maintain Sump Pump 2A. Sump Pump Station 1/1A is not normally used during the summer (during dry weather periods) and is only operated as needed during wet weather or large storm events. Sump Pump Station 2/2A is the primary pump station facility for the CSS, and is operated continuously throughout the year.

The SRCSD is contracted to accept up to 60 million gallons per day ("mgd") of combined wastewater and stormwater runoff from the CSS. Combined flows are managed by the Sump Pump Station 2/2A facility operated by the City. Flows in excess of 60 mgd are routed either through the Pioneer Reservoir or to the CWTP for storage and, when necessary, for primary treatment. The Pioneer Reservoir and interceptor have storage capacity of 23 million gallons ("MG") and 5 MG, respectively. The CWTP has additional storage capacity of 9.2 MG (including the CWTP interceptor). The City uses these facilities to store and sometimes to provide primary treatment to wet weather combined wastewater flow in excess of the 60 mgd SRCSD capacity limit. Stored combined wastewater is eventually routed back to Sump Pump Station 2/2A for transport to the SRCSD's SRWTP for further treatment and eventual discharge to the Sacramento River.

The project proponents would be required to pay an appropriate share of the capitol costs into the Combined Sewer Mitigation Fee in order to mitigate demands of increased growth on existing or new CSS facilities. See page 132 of the SCEA IS, Section XII, Utilities and Service Systems, for a discussion regarding the projects potential for impacts to the CSS. Cumulative flows associated with the project will be quantified in the sewer study to ensure wet and dry weather capacity limitations are not exceeded. The utility plan and sewer study will be reviewed and approved by the Department of Utilities prior to Building Permits being issued.

**Response to Comment 3-4**

The comment has been noted; however, it does not specifically address the adequacy of the SCEA IS.

## Letter 4

**Scott Johnson**

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**From:** Cat Hernandez <kit.catwoman@gmail.com>  
**Sent:** Tuesday, April 14, 2015 3:02 PM  
**To:** Antonio Ablog; Scott Johnson  
**Subject:** Stockton and T Street Project Comments and Questions

Hi Antonio and Scott,

I have a couple of questions and concerns about the upcoming project.

- 4-1 1. Are 37th and S Streets going to be widened? In several previous presentations by the Evergreen Company, they stated that both streets will be widened to standard 2 lane streets. I could not find in the document where this is stated. Are the streets still planned to be widened?
- 4-1 Currently, when driving north onto 37th, when cars are parked on both sides of the street, there is only room for 1 car to pass through. There is currently no parking on the north side of S Street. If 37th and S Street are not widened, and parking is allowed on the both sides of both streets, it will restrict traffic flow. Page 81 of the Initial Environmental Assessment states that the City shall discourage street widening.
- 4-2 2a. Parking: The proposed apartment complex will have a garage for 1 parking space per resident. In the event of a resident having more than 1 vehicle (for example - a couple with 2 cars), where is the extra car going to be parked? I imagine on the street with a residential parking pass. Say 5 - 10% of the 234 residents fall into this category, that is 12 -24 additional cars parked on the surrounding streets on a daily basis. That alone is already a large amount of additional cars parked on the surrounding streets. This is not counting guests that may be visiting residents. Is there off street guest parking for the apartments? What is being done to address this potential impact to the neighborhood?
- 4-3 2b. At one point, the Evergreen Company also stated that there were proposing additional back-in parking at the corner of T street just east of Stockton. They stated that they were proposing to widen T Street, across from Starbucks, to the back of the existing sidewalk to create additional spaces where currently, there are only 2. Where in the plans is this reflected, or is it still part of the plan?

Overall, I am excited about the project, just concerned about a few things that directly impact the surrounding neighborhood. Please address my concerns in a timely manner, and consider this as my submittal for public comments.

Sincerely,

Catherine Hernandez  
3824 S Street  
Sacramento, CA 956816

**LETTER 4: CATHERINE HERNANDEZ, RESIDENT**

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**Response to Comment 4-1**

The comment requests more details regarding any planned widening of S Street and 37<sup>th</sup> Street. According to the project site plan, the west side of 37<sup>th</sup> Street along the project frontage would be widened to provide on-street parking on both sides of the street, and a detached sidewalk. Widening of S Street along the project frontage is planned to allow for a planter and sidewalk along the project frontage. The Stockton Boulevard and T Street grading plan shows additional 15.33 feet to be dedicated on the west side of 37<sup>th</sup> Street along the project frontage and 1.5 feet of additional ROW on the north side of S Street along the project frontage.

**Response to Comment 4-2**

The comment requests more information regarding adequacy of the proposed supply of on-site parking for the apartments. On the site, there will be a parking garage with about 230 parking spaces to accommodate 214 unit apartment complex tenant parking needs. Approximately 12 new parallel parking spaces will be accommodated on the west side of 37<sup>th</sup> Street as a result of 37<sup>th</sup> Street widening along the project frontage. The development is a transit oriented development within a walking distance to 39<sup>th</sup> Street light rail station. Additionally, Regional Transit bus routes 38, 212, 213, and 214 provide service to the residents in the proximity of the project site. On-street parking is permitted on portions of T Street east of Stockton Boulevard. Parking is permitted on Stockton Boulevard under the US 50 overcrossing, but prohibited south of the interchange. The residential area in the vicinity of T Street, 37<sup>th</sup> Street, S Street, and 39<sup>th</sup> Street has a residential permit parking program, which prohibits on-street parking between the hours of 8 AM and 6 PM unless vehicles are equipped with a B Parking Permit. The project proposes to provide more parking spaces than it is required. In the Urban Parking District, where the project site is located, 0.5 parking spaces per multi-family unit are required. The project anticipates providing 230 spaces for the 214 multi-family units; just over one parking space per unit.

**Response to Comment 4-3**

The comment requests more information regarding plans to widen T Street along the project frontage. The project site plan indicated widening of T Street to accommodate on-street angled parking. The final traffic report recommended that the angled parking be replaced with parallel parking and limited in length so that spaces do not encroach into the right-turn lane onto northbound Stockton Boulevard. The proposed project will provide a 4-foot bike lane at the intersection with Stockton Boulevard to comply with the City of Sacramento Bikeway Master Plan. Modifications to the planter and sidewalk are also proposed.

Letter 5

**Scott Johnson**

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**From:** Lovato, Karin K <karin.k.lovato@intel.com>  
**Sent:** Thursday, April 16, 2015 12:51 PM  
**To:** Scott Johnson  
**Cc:** Jennifer West; Sarah Tierney; Maria Alvarez; 'gabriel.tierney@covidien.com'; 'rgould@gmail.com'; damonster@earthlink.net; Elizabeth Yi; Lovato, Karin K; Ross Lovato; Debby Henry (debbyjhenry@yahoo.com);  
**Subject:** RE: Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental Assessment - Neighbor Response

Dear Mr. Johnson:

Thank you for the opportunity to review the Draft Sustainable Communities Environmental Assessment (SCEA) for the Stockton and T Street Project. Infill projects, if designed appropriately, can be an asset to the community and the neighborhood is in agreement that this site needs to be developed appropriately.

I have reviewed the draft impact assessments, and have a few comments:

1. The State of California is experiencing catastrophic drought conditions. As a result, Sacramento residents are required to cut consumption of up to 35%. The SCEA is using the 2010 Urban Water Management Plan to determine that there is sufficient water to supply the project. As we are facing this historic and catastrophic drought – comparing water consumption to 2010 standards doesn't appear to be relevant.

In fact, according to SCEA, page 133 and Table 21, page 134, the 2010 study factored in a 3 year drought. The State is currently in its 4<sup>th</sup> year as determined by the CA State Water Board. Based on this catastrophic drought condition, the State Water Board has issued the following warning to water right holders across the State:

"April 3, 2015 - As California enters a fourth year of drought with a record-low snowpack, the State Water Resources Control Board (State Water Board) is warning that water right holders, including some senior right holders, are likely to be curtailed soon within key watersheds in the state."

Since the 2010 Urban Water Management Plan did not address a 4<sup>th</sup> year drought, the SCEA analysis is not adequate. The impact of growth and development in a 4 year drought, or beyond must be studied.

Consequently, the proposed project is not consistent with the following City's General Plan Policies:

- U 2.1.5 **Comprehensive Water Supply Plans.** The City shall prepare, implement, and maintain long-term, comprehensive water supply plans.
- U 2.1.7 **Water Supply During Emergencies.** The City shall, to the extent feasible, maintain and adequate water supply during emergency situations.
- U 2.1.8 **New Development.** The City shall ensure that water supply capacity is in place prior to granting building permits for new development.

Moreover, since the Draft SCEA did not take into account the 4<sup>th</sup> year drought and is not identified in the report, it does not conform to Section 21155.2 of the Public Resources Code, more specially Section A which states:

"(A) All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed."

2. Table 20 on page 124 of the Draft SCEA shows that under cumulative conditions that the T Street and Stockton Blvd. intersection is failing and is mitigated by the following:

5-1

5-2

**Letter 5  
cont'd**

*XI-1 Prior to building occupancy, the project applicant shall work with the City of Sacramento to modify the traffic signal at the Stockton Boulevard/T Street intersection to operate the northbound and southbound left-turns with protected phasing.*

It is not clear how an upgraded or improved signal can improve the intersection. In fact, phasing or timing the light differently can increase wait times at the intersection. It appears that the only reasonable way to improve the intersection and allow for increased traffic is to increase the intersection capacity. However, since this is in a fully developed area it is again not clear how this impact can be mitigated to a level that is less than significant.

Consequently, the project is not consistent with Section 21155.2 (2) of the Public Resources Code states,

(2) The sustainable communities environmental assessment shall contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.

3. It appears that the apartments were designed with one parking stall per unit. As a nearby resident, I am concerned about overflow parking which can impact the local streets.

- a. Is there additional parking planned for the apartment complex?
- b. Even if this is located in a "transportation friendly" location, the reality is that apartment renters may have more than one car. There is very little available parking in that area. What are the plans so that existing neighbors are not negatively impacted by additional cars parking on the streets?

Based on the fact that the Draft SCEA has not adequately addressed the 4<sup>th</sup> year drought conditions and has not adequately mitigated the falling intersection at T Street and Stockton Boulevard, the Mandatory Findings of Significance on page 136 are not valid. The water needs of existing residents should be considered when planning new homes. As City residents are asked to cut water use by 35% it is not reasonable to be building new projects. At a minimum, the City needs to evaluate these projects with a more current water document that includes the current catastrophic conditions.

As mentioned, infill projects can be beneficial for communities, if designed correctly. Based on the technical issues detailed above, this project is not designed appropriately.

I am copying neighbors who share these concerns and are interested in your response.

Thank you ~

**Karin Lovato**  
(916) 718-5335  
[Karin.k.lovato@intel.com](mailto:Karin.k.lovato@intel.com)

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**From:** Scott Johnson  
**Sent:** Friday, March 20, 2015 11:33 AM  
**To:** Scott Johnson  
**Cc:** Tom Buford; Antonio Ablog  
**Subject:** Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental Assessment

**NOTICE OF AVAILABILITY/INTENT TO ADOPT - SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) FOR THE**

**STOCKTON AND T STREET PROJECT (P14-042)**

**REVIEW PERIOD: March 20, 2015 through April 20, 2015**

The City of Sacramento, Community Development Department, Environmental Planning Services has completed the preparation of a draft Sustainable Communities Environmental Assessment (SCEA) for the Stockton and T Street (P14-

5-2  
cont'd

5-3

5-4

## Letter 5 cont'd

042) project. The proposed project is located at 3675 T Street in the City of Sacramento in Sacramento County, California, and identified as Assessor Parcel Numbers (APN) 010-0082-001,-004, and 011-0021-029. The project site consists of approximately 4.9 acres (213,444 sf).

The proposed project would remove the existing 120,000-square foot (sf) vacant office building (formerly AT&T) and associated parking lot and subdivide the property for construction of a mixed-use residential and commercial development. The proposed project includes a 214-unit, five-story, multi-family housing complex with ground floor commercial and parking garage on the corner of Stockton Boulevard and T Street. In addition, the proposed project includes construction of approximately 24 single-family homes between S Street and U.S. Highway 50 (US 50).

The document is now available for a 30-day public review and comment period. The comment period is from **Friday, March 20, 2015 through Monday, April 20, 2015**. You may review a copy or obtain an CD copy of the document at the 300 Richards Boulevard, 3<sup>rd</sup> Floor reception desk, Sacramento, CA 95811 between the hours of 9:00 AM and 4:00 PM, Monday through Friday. The draft Sustainable Communities Environmental Assessment is also available at:

<http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>.

Comments can be sent to:

Scott Johnson  
City of Sacramento  
Community Development Dept.  
Environmental Planning Services  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
(916) 808-5842

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**LETTER 5: KARIN LOVATO, RESIDENT**

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**Response to Comment 5-1**

The City along with much of the State of California is in a state of declared drought (as noted in the comment). The City has implemented water conservation measures consistent with the Stage 2 Drought described in the City's 2010 Urban Water Management Plan (Section 5.2.3.1 "Stages of Action"). This stage of drought is sufficient for conservation of water up to 30%. The City's conservation goal is 28% consistent with the Governor's Executive Order B-29-15. The City will continue to enforce Stage 2 drought measures and will implement new measures that will be applicable to new development (also consistent with Executive Order B-29-15). The City's 2010 Urban Water Management Plan is adequately prepared to give policy guidance and for the long term planning of the City's water supplies. The City's water supplies are adequate for this declared drought. The City Stage 2 drought response does not include suspending the issuances of new connections to the water system. The City anticipates that its water conservation measures will protect its water supply and does not foresee the need to suspend new water connections.

The SCEA analyzed water supply impacts in accordance with SB 610/SB 221 requirements. As discussed on page 139 of the SCEA, within the Utilities and Service Systems section, "the demand from the proposed project was accounted for in the City's General Plan, and Master EIR, as the project is consistent with the General Plan land use designation and City zoning. The Master EIR concluded that the City's existing water right permits and United States Bureau of Reclamation (USBR) contract are sufficient to meet the total water demand projected for buildout of the proposed 2030 General Plan, including the proposed project site." Because the proposed project is consistent with the City's General Plan, and Master EIR, the project was also covered in the Urban Water Management Plan (UWMP). The UWMP is the water supply plan currently in effect. In addition, the UWMP is based on substantial evidence and remains the most up-to-date, scientifically-based method available to evaluate water supply impacts in the area. As a result, the UWMP was used to analyze the proposed project's impacts related to water supply.

**Response to Comment 5-2**

The comment expresses skepticism that signal phasing and timing adjustments at the Stockton Boulevard/T Street intersection would benefit operations. The final traffic report describes the need to convert the northbound and southbound left-turn movements from permitted to protected signal phases. The effects of this change were tested using the state-of-the-practice SimTraffic micro-simulation model. Table 12 of the final traffic report shows that the proposed mitigation would result in less overall vehicle delay (when compared to the current settings) at the Stockton Boulevard/ T Street intersection. Under cumulative PM peak hour conditions, operations are expected to worsen to an unacceptable LOS F condition, either without or with the project. If the proposed project is not approved and constructed, the existing office building would likely remain and would have new tenants. The final traffic report shows that the proposed project would generate 35 percent less AM peak hour traffic and 17 percent less PM peak hour traffic when compared to the trip generation potential of the existing office building.

**Response to Comment 5-3**

The commenter is concerned about overflow parking. The on-site parking garage would provide about 230 parking spaces to accommodate 214 unit apartment complex tenant parking needs. In the Urban Parking District, where the project site is located, 0.5 parking spaces per multi-family unit are required. As such, the project proposes to provide more parking spaces than is required. In addition, the west side of 37<sup>th</sup> Street along the project frontage would be widened to provide a total of 12 new parallel on-street parking spaces on either side of the street. The SCEA IS states on page 107 that the “residential area in the vicinity of T Street, 37<sup>th</sup> Street, S Street, and 39<sup>th</sup> Street has a residential permit parking program, which prohibits on-street parking between the hours of 8 AM and 6 PM unless vehicles are equipped with a B Parking Permit.”

**Response to Comment 5-4**

As discussed in the responses to comments above, the SCEA IS does adequately address the proposed project’s potential impacts as required under CEQA and SB 375.

## Letter 6

### Scott Johnson

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**From:** Tierney, Gabriel <Gabriel.Tierney@covidien.com>  
**Sent:** Thursday, April 16, 2015 4:08 PM  
**To:** Lovato, Karin K; Scott Johnson  
**Cc:** Jennifer West; Sarah Tierney; Maria Alvarez; 'rgould@gmail.com';  
demonster@earthlink.net; Elizabeth Yi; Ross Lovato; Debby Henry  
(debbyjhenry@yahoo.com); ,  
**Subject:** RE: Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities  
Environmental Assessment - Neighbor Response

Hi Karin,

Thank you for your well thought out email.

6-1

Agree to all concerns, as discussed.

Thank You,

#### Gabe Tierney

Senior Territory Sales Manager  
Medtronic Peripheral Vascular - VNUS  
15 Hampshire Street  
Mansfield, MA 02048

916-606-3285 (mobile)  
888-389-9039 (fax)  
gabe.tierney@covidien.com



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\*\*\*\*\*

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**From:** Lovato, Karin K [mailto:karin.k.lovato@intel.com]  
**Sent:** Thursday, April 16, 2015 12:51 PM  
**To:** Scott Johnson  
**Cc:** Jennifer West; Sarah Tierney; Maria Alvarez; Tierney, Gabriel; 'rgould@gmail.com'; demonster@earthlink.net;  
Elizabeth Yi; Lovato, Karin K; Ross Lovato; Debby Henry (debbyjhenry@yahoo.com); ,  
**Subject:** RE: Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental  
Assessment - Neighbor Response

Dear Mr. Johnson:

Thank you for the opportunity to review the Draft Sustainable Communities Environmental Assessment (SCEA) for the Stockton and T Street Project. Infill projects, if designed appropriately, can be an asset to the community and the neighborhood is in agreement that this site needs to be developed appropriately.

I have reviewed the draft impact assessments, and have a few comments:

## Letter 6 cont'd

1. The State of California is experiencing catastrophic drought conditions. As a result, Sacramento residents are required to cut consumption of up to 35%. The SCEA is using the 2010 Urban Water Management Plan to determine that there is sufficient water to supply the project. As we are facing this historic and catastrophic drought – comparing water consumption to 2010 standards doesn't appear to be relevant.

In fact, according to SCEA, page 133 and Table 21, page 134, the 2010 study factored in a 3 year drought. The State is currently in its 4<sup>th</sup> year as determined by the CA State Water Board. Based on this catastrophic drought condition, the State Water Board has issued the following warning to water right holders across the State:

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Consequently, the proposed project is not consistent with the following City's General Plan Policies:

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- U 2.1.7 **Water Supply During Emergencies.** The City shall, to the extent feasible, maintain and adequate water supply during emergency situations.
- U 2.1.8 **New Development.** The City shall ensure that water supply capacity is in place prior to granting building permits for new development.

Moreover, since the Draft SCEA did not take into account the 4<sup>th</sup> year drought and is not identified in the report, it does not conform to Section 21155.2 of the Public Resources Code, more specially Section A which states:

"(A) All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed."

2. Table 20 on page 124 of the Draft SCEA shows that under cumulative conditions that the T Street and Stockton Blvd. intersection is failing and is mitigated by the following:

*XI-1 Prior to building occupancy, the project applicant shall work with the City of Sacramento to modify the traffic signal at the Stockton Boulevard/T Street intersection to operate the northbound and southbound left-turns with protected phasing.*

It is not clear how an upgraded or improved signal can improve the intersection. In fact, phasing or timing the light differently can increase wait times at the intersection. It appears that the only reasonable way to improve the intersection and allow for increased traffic is to increase the intersection capacity. However, since this is in a fully developed area it is again not clear how this impact can be mitigated to a level that is less than significant.

Consequently, the project is not consistent with Section 21155.2 (2) of the Public Resources Code states,

(2) The sustainable communities environmental assessment shall contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.

3. It appears that the apartments were designed with one parking stall per unit. As a nearby resident, I am concerned about overflow parking which can impact the local streets.

## Letter 6 cont'd

- a. Is there additional parking planned for the apartment complex?
- b. Even if this is located in a "transportation friendly" location, the reality is that apartment renters may have more than one car. There is very little available parking in that area. What are the plans so that existing neighbors are not negatively impacted by additional cars parking on the streets?

Based on the fact that the Draft SCEA has not adequately addressed the 4<sup>th</sup> year drought conditions and has not adequately mitigated the falling intersection at T Street and Stockton Boulevard, the Mandatory Findings of Significance on page 136 are not valid. The water needs of existing residents should be considered when planning new homes. As City residents are asked to cut water use by 35% it is not reasonable to be building new projects. At a minimum, the City needs to evaluate these projects with a more current water document that includes the current catastrophic conditions.

As mentioned, infill projects can be beneficial for communities, if designed correctly. Based on the technical issues detailed above, this project is not designed appropriately.

I am copying neighbors who share these concerns and are interested in your response.

Thank you ~

**Karin Lovato**

(916) 718-5335

[Karin.k.lovato@intel.com](mailto:Karin.k.lovato@intel.com)

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**From:** Scott Johnson  
**Sent:** Friday, March 20, 2015 11:33 AM  
**To:** Scott Johnson  
**Cc:** Tom Buford; Antonio Ablog  
**Subject:** Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental Assessment

### NOTICE OF AVAILABILITY/INTENT TO ADOPT - SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT (SCEA) FOR THE

#### STOCKTON AND T STREET PROJECT (P14-042)

REVIEW PERIOD: **March 20, 2015 through April 20, 2015**

The City of Sacramento, Community Development Department, Environmental Planning Services has completed the preparation of a draft Sustainable Communities Environmental Assessment (SCEA) for the Stockton and T Street (P14-042) project. The proposed project is located at 3675 T Street in the City of Sacramento in Sacramento County, California, and identified as Assessor Parcel Numbers (APN) 010-0082-001,-004, and 011-0021-029. The project site consists of approximately 4.9 acres (213,444 sf).

The proposed project would remove the existing 120,000-square foot (sf) vacant office building (formerly AT&T) and associated parking lot and subdivide the property for construction of a mixed-use residential and commercial development. The proposed project includes a 214-unit, five-story, multi-family housing complex with ground floor commercial and parking garage on the corner of Stockton Boulevard and T Street. In addition, the proposed project includes construction of approximately 24 single-family homes between S Street and U.S. Highway 50 (US 50).

The document is now available for a 30-day public review and comment period. The comment period is from **Friday, March 20, 2015 through Monday, April 20, 2015**. You may review a copy or obtain an CD copy of the document at the 300 Richards Boulevard, 3<sup>rd</sup> Floor reception desk, Sacramento, CA 95811 between the hours of 9:00 AM and 4:00 PM, Monday through Friday. The draft Sustainable Communities Environmental Assessment is also available at:

**Letter 6  
cont'd**

<http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>.

Comments can be sent to:

Scott Johnson  
City of Sacramento  
Community Development Dept.  
Environmental Planning Services  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811  
(916) 808-5842

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**LETTER 6: GABE TIERNEY, RESIDENT**

---

**Response to Comment 6-1**

See response to Letter 5.

## Letter 7

### Scott Johnson

---

**From:** Roxanne Gould <rgould@gmail.com>  
**Sent:** Thursday, April 16, 2015 4:15 PM  
**To:** Tierney, Gabriel  
**Cc:** Lovato, Karin K; Scott Johnson; Jennifer West; Sarah Tierney; Maria Alvarez; damonster@earthlink.net; Elizabeth Yi; Ross Lovato; Debby Henry (debbyjhenry@yahoo.com); ,  
**Subject:** Re: Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental Assessment - Neighbor Response

7-1

Thank you for a finely articulated description of the concerns we in the neighborhood share. I am in agreement with all of your concerns and hope that they are a significant factor in the deliberations as to whether this project is approved or denied.

Best,

Roxanne Gould  
President, Roxanne Gould Government Relations

On Thursday, April 16, 2015, Tierney, Gabriel <[Gabriel.Tierney@covidien.com](mailto:Gabriel.Tierney@covidien.com)> wrote:

Hi Karin,

Thank you for your well thought out email.

Agree to all concerns, as discussed.

Thank You,

### Gabe Tierney

Senior Territory Sales Manager  
Medtronic Peripheral Vascular - VNUS  
15 Hampshire Street  
Mansfield, MA 02048

**Letter 7  
cont'd**

916-606-3285 (mobile)

888-389-9039 (fax)

gabe.tierney@covidien.com



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\*\*\*\*\*

---

**From:** Lovato, Karin Kget="\_blank">karin.k.lovato@intel.com]  
**Sent:** Thursday, April 16, 2015 12:51 PM  
**To:** Scott Johnson  
**Cc:** Jennifer West; Sarah Tierney; Maria Alvarez; Tierney, Gabriget="\_blank">rgould@gmail.com; damonster@earthlink.net; Elizabeth Yi; Lovato, Karin K; Ross Lovato; Debbget="\_blank">debbyjhenry@yahoo.com); ,  
**Subject:** RE: Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental Assessment - Neighbor Response

Dear Mr. Johnson:

Thank you for the opportunity to review the Draft Sustainable Communities Environmental Assessment (SCEA) for the Stockton and T Street Project. Infill projects, if designed appropriately, can be an asset to the community and the neighborhood is in agreement that this site needs to be developed appropriately.

I have reviewed the draft impact assessments, and have a few comments:

1. The State of California is experiencing catastrophic drought conditions. As a result, Sacramento residents are required to cut consumption of up to 35%. The SCEA is using the 2010 Urban Water Management Plan to determine that there is sufficient water to supply the project. As we are facing this

historic and catastrophic drought – comparing water consumption to 2010 standards doesn't appear to be relevant.

In fact, according to SCEA, page 133 and Table 21, page 134, the 2010 study factored in a 3 year drought. The State is currently in its 4<sup>th</sup> year as determined by the CA State Water Board. Based on this catastrophic drought condition, the State Water Board has issued the following warning to water right holders across the State:

"April 3, 2015 - As California enters a fourth year of drought with a record-low snowpack, the State Water Resources Control Board (State Water Board) is warning that water right holders, including some senior right holders, are likely to be curtailed soon within key watersheds in the state."

Since the 2010 Urban Water Management Plan did not address a 4<sup>th</sup> year drought, the SCEA analysis is not adequate. The impact of growth and development in a 4 year drought, or beyond must be studied.

Consequently, the proposed project is not consistent with the following City's General Plan Policies:

- U 2.1.5 **Comprehensive Water Supply Plans.** The City shall prepare, implement, and maintain long-term, comprehensive water supply plans.
  
- U 2.1.7 **Water Supply During Emergencies.** The City shall, to the extent feasible, maintain and adequate water supply during emergency situations.
  
- U 2.1.8 **New Development.** The City shall ensure that water supply capacity is in place prior to granting building permits for new development.

Moreover, since the Draft SCEA did not take into account the 4<sup>th</sup> year drought and is not identified in the report, it does not conform to Section 21155.2 of the Public Resources Code, more specially Section A which states:

"(A) All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed."

2. Table 20 on page 124 of the Draft SCEA shows that under cumulative conditions that the T Street and Stockton Blvd. intersection is failing and is mitigated by the following:

*XI-1 Prior to building occupancy, the project applicant shall work with the City of*

*Sacramento to modify the traffic signal at the Stockton Boulevard/T Street*

**Letter 7**

*intersection to operate the northbound and southbound left-turns with protected phasing.* **cont'd**

It is not clear how an upgraded or improved signal can improve the intersection. In fact, phasing or timing the light differently can increase wait times at the intersection. It appears that the only reasonable way to improve the intersection and allow for increased traffic is to increase the intersection capacity. However, since this is in a fully developed area it is again not clear how this impact can be mitigated to a level that is less than significant.

Consequently, the project is not consent with Section 21155.2 (2) of the Public Resources Code states,

(2) The sustainable communities environmental assessment shall contain measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.

3. It appears that the apartments were designed with one parking stall per unit. As a nearby resident, I am concerned about overflow parking which can impact the local streets.

a. Is there additional parking planned for the apartment complex?

b. Even if this is located in a "transportation friendly" location, the reality is that apartment renters may have more than one car. There is very little available parking in that area. What are the plans so that existing neighbors are not negatively impacted by additional cars parking on the streets?

Based on the fact that the Draft SCEA has not adequately addressed the 4<sup>th</sup> year drought conditions and has not adequately mitigated the falling intersection at T Street and Stockton Boulevard, the Mandatory Findings of Significance on page 136 are not valid. The water needs of existing residents should be considered when planning new homes. As City residents are asked to cut water use by 35% it is not reasonable to be building new projects. At a minimum, the City needs to evaluate these projects with a more current water document that includes the current catastrophic conditions.

As mentioned, infill projects can be beneficial for communities, if designed correctly. Based on the technical issues detailed above, this project is not designed appropriately.

I am copying neighbors who share these concerns and are interested in your response.

APRIL 2015

**Letter 7  
cont'd**

Thank you ~

**Karin Lovato**

[Karin.k.lovato@intel.com](mailto:Karin.k.lovato@intel.com)

---

**From:** Scott Johnson  
**Sent:** Friday, March 20, 2015 11:33 AM  
**To:** Scott Johnson  
**Cc:** Tom Buford; Antonio Ablog  
**Subject:** Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental Assessment

**NOTICE OF AVAILABILITY/INTENT TO ADOPT - SUSTAINABLE COMMUNITIES  
ENVIRONMENTAL ASSESSMENT (SCEA) FOR THE**

**STOCKTON AND T STREET PROJECT (P14-042)**

**REVIEW PERIOD: March 20, 2015 through April 20, 2015**

The City of Sacramento, Community Development Department, Environmental Planning Services has completed the preparation of a draft Sustainable Communities Environmental Assessment (SCEA) for the Stockton and T Street (P14-042) project. The proposed project is located at 3675 T Street in the City of Sacramento in Sacramento County, California, and identified as Assessor Parcel Numbers (APN) 010-0082-001,-004, and 011-0021-029. The project site consists of approximately 4.9 acres (213,444 sf).

The proposed project would remove the existing 120,000-square foot (sf) vacant office building (formerly AT&T) and associated parking lot and subdivide the property for construction of a mixed-use residential and commercial development. The proposed project includes a 214-unit, five-story, multi-family housing complex with ground floor commercial and parking garage on the corner of Stockton Boulevard and T Street. In addition, the proposed project includes construction of approximately 24 single-family homes between S Street and U.S. Highway 50 (US 50).

The document is now available for a 30-day public review and comment period. The comment period is from Friday, March 20, 2015 through Monday, April 20, 2015. You may review a copy or obtain an CD copy of the document at the 300 Richards Boulevard, 3<sup>rd</sup> Floor reception desk, Sacramento, CA 95811 between the hours of 9:00 AM and 4:00 PM, Monday through Friday. The draft Sustainable Communities Environmental Assessment is also available at:

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Comments can be sent to:

Scott Johnson

City of Sacramento

Community Development Dept.

Environmental Planning Services

300 Richards Blvd., 3<sup>rd</sup> Floor

Sacramento, CA 95811

(916) 808-5842

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--

**Roxanne Gould Government Relations**  
1121 L Street, Suite 508  
Sacramento, California 95814  
(916) 715-0900

**LETTER 7: ROXANNE GOULD, RESIDENT**

---

**Response to Comment 7-1**

See response to Letter 5.

## Letter 8

**Scott Johnson**

---

**From:** Debby Henry <debbyjhenry@yahoo.com>  
**Sent:** Thursday, April 16, 2015 5:29 PM  
**To:** GabrielTierney; Roxanne Gould  
**Cc:** Karin K Lovato; Scott Johnson; Jennifer West; Sarah Tierney; Maria Alvarez; damonster@earthlink.net; Elizabeth Yi; Ross Lovato; messier.jamie@gmail.com  
**Subject:** Re: Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental Assessment - Neighbor Response

Karin,

8-1

Thank you for all your time and concerns on all these issues. I'm on board and agree with what's best for our neighborhood on all concerns.

Debby J Henry

On Thu, 4/16/15, Roxanne Gould <rgould@gmail.com> wrote:

Subject: Re: Notice of Stockton and T Street (P14-042) Initial Study/Sustainable Communities Environmental Assessment - Neighbor Response  
To: "Tierney, Gabriel" <Gabriel.Tierney@covidien.com>  
Cc: "Lovato, Karin K" <karin.k.lovato@intel.com>, "Scott Johnson" <SRJohnson@cityofsacramento.org>, "Jennifer West" <JCWest@cityofsacramento.org>, "Sarah Tierney" <stierney@sleeptrain.com>, "Maria Alvarez" <MALvarez@cityofsacramento.org>, "damonster@earthlink.net" <damonster@earthlink.net>, "Elizabeth Yi" <eyi@apple.com>, "Ross Lovato" <lovato23@aol.com>, "Debby Henry (debbyjhenry@yahoo.com)" <debbyjhenry@yahoo.com>, "," <messier.jamie@gmail.com>  
Date: Thursday, April 16, 2015, 4:15 PM

Thank you for a finely articulated description of the concerns we in the neighborhood share. I am in agreement with all of your concerns and hope that they are a significant factor in the deliberations as to whether this project is approved or denied.

Best,  
Roxanne Gould  
Roxanne Gould President,  
Roxanne Gould Government Relations

On  
Thursday, April 16, 2015, Tierney, Gabriel <Gabriel.Tierney@covidien.com>  
wrote:

Hi  
Karin,

**Letter 8  
cont'd**

Thank you  
for your well thought out email.

Agree to  
all concerns, as discussed.

Thank  
You,

Gabe Tierney

Senior Territory Sales  
Manager  
Medtronic Peripheral Vascular -  
VNUS  
15 Hampshire  
Street  
Mansfield, MA  
02048

916-606-3285  
(mobile)  
888-389-9039  
(fax)  
gabe.tierney@covidien.com

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received  
this in error, please inform the sender and remove any record of this message. \*\*\*\*\*

From: Lovato, Karin K [mailto:karin.k.lovato@intel.com]

Sent: Thursday, April 16, 2015 12:51 PM

To: Scott Johnson

Cc: Jennifer West; Sarah Tierney; Maria Alvarez; Tierney, Gabriel; 'rgould@gmail.com'; damonster@earthlink.net;  
Elizabeth Yi; Lovato, Karin K; Ross Lovato; Debby Henry (debbyjhenry@yahoo.com); ,

**Letter 8  
cont'd**

Subject: RE: Notice of Stockton and T Street  
(P14-042) Initial Study/Sustainable Communities Environmental Assessment - Neighbor Response

Dear Mr.  
Johnson:

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I have reviewed the draft impact assessments, and have a few comments:

1.  
The State of California is experiencing catastrophic drought conditions. As a result, Sacramento residents are required to cut consumption of up to 35%. The SCEA is using the 2010 Urban Water Management Plan to determine that there is sufficient water to supply the project. As we are facing this historic and catastrophic drought – comparing water consumption to 2010 standards doesn't appear to be relevant.

In fact, according to SCEA, page 133 and Table 21, page 134, the 2010 study factored in a 3 year drought. The State is currently in its 4th year as determined by the CA State Water Board. Based on this catastrophic drought condition, the State Water Board has issued the following warning to water right holders across the State:

"April 3, 2015 -  
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U 2.1.5  
Comprehensive Water Supply Plans. The City shall prepare, implement, and maintain long-term, comprehensive

**Letter 8  
cont'd**

water supply plans.

U 2.1.7

Water Supply During Emergencies. The City shall, to the extent feasible, maintain and adequate water supply during emergency situations.

U 2.1.8

New Development. The City shall ensure that water supply capacity is in place prior to granting building permits for new development.

Moreover, since the Draft SCEA did not take into account the 4th year drought and is not identified in the report, it does not conform to Section 21155.2 of the Public Resources Code, more specially Section A which states:

“(A) All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed.”

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Table 20 on page 124 of the Draft SCEA shows that under cumulative conditions that the T Street and Stockton Blvd. intersection is failing and is mitigated by the following:

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Sacramento to modify the traffic signal at the Stockton Boulevard/T Street

intersection to operate the northbound and southbound left-turns with protected phasing.

It is not clear how an upgraded or improved signal can improve the intersection. In fact,

**Letter 8  
cont'd**

phasing or timing the light differently can increase wait times at the intersection. It appears that the only reasonable way to improve the intersection and allow for increased traffic is to increase the intersection capacity. However, since this is in a fully developed area it is again not clear how this impact can be mitigated to a level that is less than significant.

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a.  
Is there additional parking planned for the apartment complex?

b.  
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Based on the fact that the Draft SCEA has not adequately addressed the 4th year drought conditions and has not adequately mitigated the falling intersection at T Street and Stockton

**Letter 8  
cont'd**

Boulevard, the Mandatory Findings of Significance on page 136 are not valid. The water needs of existing residents should be considered when planning new homes. As City residents are asked to cut water use by 35% it is not reasonable to be building new projects. At a minimum, the City needs to evaluate these projects with a more current water document that includes the current catastrophic conditions.

As mentioned, infill projects can be beneficial for communities, if designed correctly. Based on the technical issues detailed above, this project is not designed appropriately.

I am copying neighbors who share these concerns and are interested in your response.

Thank you  
~

Karin  
Lovato  
(916)  
718-5335  
Karin.k.lovato@intel.com

From: Scott Johnson

Sent: Friday, March 20, 2015 11:33 AM

To: Scott Johnson

Cc: Tom Buford; Antonio Ablog

Subject: Notice of Stockton and T Street (P14-042)  
Initial Study/Sustainable Communities Environmental  
Assessment

NOTICE OF  
AVAILABILITY/INTENT TO ADOPT - SUSTAINABLE COMMUNITIES  
ENVIRONMENTAL ASSESSMENT (SCEA) FOR

**Letter 8  
cont'd**

THE

STOCKTON AND T STREET  
PROJECT (P14-042)

REVIEW PERIOD:

March 20, 2015 through April 20,  
2015

The City of Sacramento, Community Development Department, Environmental Planning Services has completed the preparation of a draft Sustainable Communities Environmental Assessment (SCEA) for the Stockton and T Street (P14-042) project. The proposed project is located at 3675 T Street in the City of Sacramento in Sacramento County, California, and identified as Assessor Parcel Numbers (APN) 010-0082-001,-004, and 011-0021-029. The project site consists of approximately 4.9 acres (213,444 sf).

The proposed project would remove the existing 120,000-square foot (sf) vacant office building (formerly AT&T) and associated parking lot and subdivide the property for construction of a mixed-use residential and commercial development. The proposed project includes a 214-unit, five-story, multi-family housing complex with ground floor commercial and parking garage on the corner of Stockton Boulevard and T Street. In addition, the proposed project includes construction of approximately 24 single-family homes between S Street and U.S. Highway 50 (US 50).

The document is now available for a 30-day public review and comment period. The comment period is from Friday, March 20, 2015 through Monday, April 20, 2015. You may review a copy or obtain an CD copy of the document at the 300 Richards Boulevard, 3rd Floor reception desk, Sacramento, CA 95811 between the hours of 9:00 AM and 4:00 PM, Monday through Friday. The draft Sustainable Communities Environmental Assessment is also available at:

<http://portal.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>.

Comments can be sent  
to:

Scott Johnson  
City of

**Letter 8  
cont'd**

Sacramento  
Community Development  
Dept.  
Environmental Planning  
Services  
300 Richards Blvd., 3rd  
Floor  
Sacramento, CA  
95811  
(916) 808-5842

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--

Roxanne Gould  
Government Relations  
1121 L Street, Suite  
508  
Sacramento, California  
95814  
(916)  
715-0900

**LETTER 8: DEBBY J HENRY, RESIDENT**

---

**Response to Comment 8-1**

See response to Letter 5.



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

April 22, 2015

Scott Johnson  
City of Sacramento  
300 Richards Blvd, Third Floor  
Sacramento, CA 95811

Subject: Stockton & T Street Mixed-Use Project  
SCH#: 2015032066

Dear Scott Johnson:

The State Clearinghouse submitted the above named Other Document to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on April 20, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

9-1

**Letter 9**  
**cont'd**

**Document Details Report**  
**State Clearinghouse Data Base**

**SCH#** 2015032066  
**Project Title** Stockton & T Street Mixed-Use Project  
**Lead Agency** Sacramento, City of

**Type** Oth Other Document  
**Description** Note: SCEA/IS

The proposed project would remove the existing 120,000 sf vacant office building (formerly AT&T) and associated parking lot and subdivide the property for construction of a mixed-use residential and commercial development. The proposed project includes a 214-unit, five-story, multi-family housing complex with ground floor commercial and parking garage, on the corner of Stockton Boulevard and T Street. In addition, the proposed project include construction of approximately 21 single-family homes between S Street and U.S. Highway 50.

**Lead Agency Contact**

**Name** Scott Johnson  
**Agency** City of Sacramento  
**Phone** 916 808 5842  
**email**  
**Address** 300 Richards Blvd, Third Floor  
**City** Sacramento  
**State** CA **Zip** 95811  
**Fax**

**Project Location**

**County** Sacramento  
**City** Sacramento  
**Region**  
**Lat / Long** 38° 33' 35.72" N / 121° 27' 41.67" W  
**Cross Streets** Stockton & T Street Mixed-Use Project  
**Parcel No.** 010-0082-001, -004, 011-0021-029  
**Township** 8N **Range** 5E **Section** 7 **Base** MDB&M

**Proximity to:**

**Highways** US Hwy 50  
**Airports**  
**Railways**  
**Waterways**  
**Schools** Sacramento Charter HS  
**Land Use** The proposed project is currently occupied by a 120,000 sf vacant office building (formerly AT&T) and associated parking lot. The site has a City General Plan land use designation of Urban Corridor Low and a zoning of General Commercial

**Project Issues** Air Quality; Archaeologic-Historic; Noise; Recreation/Parks; Septic System; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Supply

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 2; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; Resources, Recycling and Recovery; California Highway Patrol; Caltrans, District 3 S; Air Resources Board; Regional Water Quality Control Bd., Region 5 (Sacramento); Department of Toxic Substances Control; Native American Heritage Commission

**Date Received** 03/19/2015 **Start of Review** 03/20/2015 **End of Review** 04/20/2015

Letter 9  
cont'd



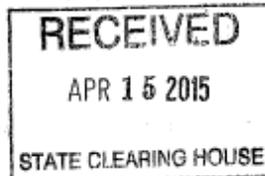
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Central Valley Regional Water Quality Control Board

13 April 2015

Scott Johnson  
City of Sacramento  
300 Richards Blvd, Third Floor  
Sacramento, CA 95811



CERTIFIED MAIL  
7014 2870 0000 7535 8256

**COMMENTS TO REQUEST FOR REVIEW FOR THE SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT, STOCKTON AND T STREET MIXED-USE PROJECT, SCH# 2015032066, SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 20 March 2015 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Sustainable Communities Environment Assessment* for the Stockton and T Street Mixed-Use 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](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

**Letter 9  
cont'd**

Stockton and T Street Mixed-Use Project - 2 -  
Sacramento County

13 April 2015

**Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

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/](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](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](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.

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<sup>1</sup> 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.

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Sacramento County

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

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

### **Waste Discharge Requirements**

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

### **Regulatory Compliance for Commercially Irrigated Agriculture**

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program.

There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/app\\_approval/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml); or contact water board staff at (916) 464-4611 or via email at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory

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Sacramento County

13 April 2015

Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at [IrrLands@waterboards.ca.gov](mailto:IrrLands@waterboards.ca.gov).

**Low or Limited Threat General NPDES Permit**

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

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:  
[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0074.pdf](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](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](mailto:tcleak@waterboards.ca.gov).



Trevor Cleak  
Environmental Scientist

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

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cont'd**

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 3 – SACRAMENTO AREA OFFICE  
703 B STREET  
MARYSVILLE, CA 95901  
PHONE (530) 741-4337  
FAX (530) 741-5346  
TTY 711



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April 20, 2015

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SCH 2015032066

Mr. Scott Johnson  
Community Development Department  
City of Sacramento  
300 Richards Blvd., 3<sup>rd</sup> Floor  
Sacramento, CA 95811

**Stockton and T Street Mixed-Use Project – Draft Sustainable Communities Environmental Assessment (SCEA)**

Dear Mr. Johnson:

Thank you for including the California Department of Transportation (Caltrans) in the draft SCEA review process for the Stockton and T Street Mixed-Use Project. Caltrans sent comments for the original and revised project applications on November 12, 2014 and March 6, 2015. Since transmission of the original comments the proposed project has undergone various revisions. This project is the first in the Sacramento region to use a streamlined review for Transit Priority Projects consistent with Sacramento Area Council of Government's Sustainable Communities Strategy. Currently, the proposed project is for the construction of a five-story, approximately 215,000 square foot multi-family housing structure with commercial retail uses, a parking garage, and 214 residential units. The proposed project also includes construction of 24 new, single-family homes between S Street and United States (US) Highway 50. The proposed project requires approval for a 21-lot tentative map, and a site plan and design review. The project site is located in the northeast quadrant of the Stockton Boulevard and T Street intersection on a 4.9-acre lot that is immediately adjacent US 50 mainline and US 50 / Stockton Boulevard on-ramp.

Caltrans new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development project 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.

*"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability"*

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***Pedestrian Improvements***

Caltrans commends the project proponent for improving pedestrian access to and from the project site.

***Potential Impacts to US Highway (US) 50***

As stated in the SCEA, this project did not provide an analysis of the State Highway System (SHS) since: "the proposed project qualifies as a Transit Priority Project (TPP) under Senate Bill (SB) 375. Environmental documents for TPPs are not required to reference, describe or discuss: 1) growth inducing impacts, 2) impacts from car and light duty truck trips on climate change or regional transportation network, or a 3) reduced density alternative to the project."

However, SB 375 went on to state, "Nothing in the foregoing relieves any project from a requirement to comply with any conditions, exactions, or fees for the mitigation of the project's impacts on the structure, safety, or operations of the regional transportation network or local streets and roads." Additionally, Public Resources Code, section 21155.3, allows for the City to adopt mitigation specifically for transit priority projects.

Given the project's proximity to the Stockton Boulevard / eastbound US 50 on-ramp, and based on field observations, Caltrans has concerns that the proposed project could result in operational impacts to the SHS that potentially increase the potential for collisions. Specifically, Caltrans is concerned that there will be queuing. Therefore, Caltrans requests that the lead agency clarify whether there will be any potential queuing impacts on the US 50 eastbound off ramp at 34<sup>th</sup> Street or the US 50 westbound off ramp at Stockton Boulevard that could impact travelers on mainline US 50. The left turn storage on the 34<sup>th</sup> Street off ramp is limited. Queuing could be expected to back up to the freeway gore area and interfere with mainline traffic flow. In addition, increased vehicular traffic volumes could impact pedestrian, bicycle, and vehicular travel through these intersections resulting in additional safety concerns. If operations are impacted, especially if those impacts potentially increase the potential for collisions, then the City should consider conditions or fees that mitigate these impacts.

***Access Management***

Based on the information in the SCEA, it is difficult to determine the spacing of driveways in relation to the US 50 Stockton Boulevard eastbound on ramp. The Caltrans Highway Design Manual (HDM), Chapter 500 - Traffic Interchanges has minimum spacing requirements for freeway ramp entrances. This project may be in conflict with those standards. Caltrans requests more detailed site plans, and/or a meeting to discuss access management within the proposed project's vicinity.

Consistent with the HDM, Chapter 500, Caltrans requests the lead agency construct a barrier that prevents left turns from Stockton Boulevard into the project site driveway and avoid potential safety impacts.

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***Hydraulics***

On page 72 of the SCEA under "Project Specific Impact Discussion", the first paragraph begins, "The proposed project site is currently developed and contains impervious services. Therefore, all the stormwater that fall on the project site flows to existing drains and feeds into the existing City CSS. Post construction, the proposed project would include impervious services and the storm drainage would continue to flow into the City CSS." Caltrans requests the lead agency clarify whether the pre-project impervious surface area equates to the post-project impervious surface area. Caltrans also requests the lead agency clarify whether the runoff from post-project conditions discharge into the same drainage system as pre-project conditions, and whether runoff peak flows are approximately equal. If any of the proposed changes to the project site impact State facilities, those impacts should be mitigated.

***Right of Way (ROW)***

The proposed project will require that a boundary survey and ROW resolution be prepared and reviewed by Caltrans. Monument perpetuation may also be required per the Land Surveyors Act in the form of a record of survey. Also, there may be utility conflicts along US 50 adjacent to the Caltrans ROW boundary.

Caltrans appreciates the project proponent actively coordinating with us to resolve any issues related to potential construction of a new soundwall along our ROW.

***Construction Traffic Management Plan (TMP) Consultation***

Caltrans would like to review the Construction TMP. The Caltrans TMP consultation contact is District 3 Traffic Manager Bob Mcnew. He can be reached at (916) 859-7978.

***Encroachment Permit***

Please be advised that any work or traffic control that would encroach onto the State 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 Charles Laughlin in the Caltrans, District 3, Office of Permits located at 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 uniform resource locator for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

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 Eric Fredericks at 916-274-0635 or by email at: [eric.fredericks@dot.ca.gov](mailto:eric.fredericks@dot.ca.gov).

*"Provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability"*

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cont'd**

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Sincerely,



MARLON FLOURNOY  
Deputy District Director  
Division of Planning and Local Assistance

c: Scott Morgan, State Clearinghouse

**LETTER 9: SCOTT MORGAN, OFFICE OF PLANNING AND RESEARCH STATE CLEARINGHOUSE  
AND PLANNING UNIT**

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**Response to Comment 9-1**

Comment noted. As described in this letter, the City has complied with State Clearinghouse review requirements, pursuant to the CEQA.