



MITIGATED NEGATIVE DECLARATION COMMENTS, RESPONSES, & REVISION ERRATA

**HARRY RENFREE FIELD RENOVATIONS PROJECT
AT DEL PASO REGIONAL PARK**

CITY OF SACRAMENTO, CALIFORNIA



NOVEMBER 2023

**MITIGATED NEGATIVE DECLARATION
COMMENTS, RESPONSES, & REVISION ERRATA
HARRY RENFREE FIELD RENOVATIONS PROJECT
AT DEL PASO REGIONAL PARK
CITY OF SACRAMENTO, CALIFORNIA**

**SUBMITTED TO:
CITY OF SACRAMENTO
COMMUNITY DEVELOPMENT DEPARTMENT
300 RICHARDS BOULEVARD 3RD FLOOR
SACRAMENTO, CALIFORNIA 95811**

**PREPARED BY:
SWCA ENVIRONMENTAL CONSULTANTS
6355 RIVERSIDE BOULEVARD, SUITE C
SACRAMENTO, CALIFORNIA 95831**

PROJECT NO. L19-3000-02

NOVEMBER 2023

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SECTION 1 – INTRODUCTION

The City of Sacramento (City), as lead agency, released the Initial Study/Mitigated Negative Declaration (Public Review Draft IS/MND) for the Harry Renfree Field Renovations Project at Del Paso Regional Park (L19-3000-02) (project) for public review from September 6 to October 6, 2023, pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15105. The Public Review Draft IS/MND and supporting documents are available at the City of Sacramento Community Development Department, located at 300 Richards Boulevard, 3rd Floor, Sacramento, California 95811 and at the Sacramento Public Library's Central Branch, located at 828 I Street, Sacramento, California 95814. The Public Review Draft IS/MND is also available online at: <https://www.cityofsacramento.org/Community-Development/Planning/Environmental/Impact-Reports>.

According to State CEQA Guidelines Sections 15073 and 15074, the lead agency must consider the comments received during consultation and review periods together with the IS/MND. However, unlike the process followed with an Environmental Impact Report (EIR), comments received on an IS/MND are not required to be attached to the IS/MND, nor must the lead agency make specific written responses to public agencies. Nonetheless, the lead agency has chosen to provide written responses to the comments received during the public review process for the Public Review Draft IS/MND, as well as revisions to the Public Review Draft IS/MND where necessary.

This document is organized into three sections and includes one updated attachment as follows:

- **Section 1 – Introduction**
- **Section 2 – Responses to Written Comments:** Provides a list of the agencies, organizations, tribes, and individuals who commented on the Public Review Draft IS/MND. Bracketed copies of all letters received regarding the Public Review Draft IS/MND and written responses to the comments provided are included in this section.
- **Section 3 – Revisions to the Initial Study/Mitigated Negative Declaration:** Includes a listing of refinements and clarifications on the Public Review Draft IS/MND, which have been incorporated.

The Final IS/MND includes the following contents:

- Public Review Draft IS/MND (provided under separate cover)
- Public Review Draft IS/MND Appendices (provided under separate cover)
- Responses to Written Comments and Revisions to Public Review Draft IS/MND (Sections 2 and 3 of this document)
- Mitigation Monitoring and Reporting Program (provided under separate cover)

SECTION 2 – RESPONSES TO WRITTEN COMMENTS

2.1 Introduction

In accordance with State CEQA Guidelines Section 15088, the City, as the lead agency, evaluated the comments received on the Public Review Draft IS/MND and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final IS/MND for the project in accordance with State CEQA Guidelines Section 15132.

2.2 List of Commenters

The City received seven comment letters on the Public Review Draft IS/MND during the 30-day comment period from September 6 to October 6, 2023, which are listed in Table 1. The letters are reprinted in this section and followed by the corresponding responses. Individual comments within the letters have been bracketed and numbered so comments can be cross-referenced with responses.

Table 1. Agencies, Tribes, Organizations, and Individual Comments

Respondent	Code	Contact Information
<i>Agencies, Tribes, Organizations</i>		
Friends of Del Paso Park Letter dated: 10/02/2023	FoDPP	<i>Contact: Charles Duckworth</i>
Sacramento Audubon Society Letter dated: 10/02/2023	SAS	P.O. Box 160694 Sacramento, CA 95816-0694 <i>Contact: Paul Miller, President</i>
Pacific Gas and Electric Company Letter dated: 10/03/2023	PGE	PG&E Plan Review Team, Land Management <i>Contact: pgeplanreview@pge.com</i>
Buena Vista Rancheria of Me-Wuk Indians Letter dated: 10/04/2023	BVR	4650 Coal Mine Road Ione, CA 95640 <i>Contact: Jesse Galvan, Cultural Heritage Specialist</i>
Central Valley Regional Water Quality Control Board Letter dated: 10/06/2023	RWQCB	11020 Sun Center Drive, Suite 200 Rancho Cordova, CA 95670 <i>Contact: Peter Minkel, Engineering Geologist</i>
<i>Individuals</i>		
Juliette Porro	JP	
Tim Vendlinski	TV	

2.3 Responses to Comments

The bracketed and numbered comment letters are shown in the following pages. The comments addressed the project site and conditions as they relate to the particular areas of concern of the respective agency, tribe, organization, or individual. Revisions in response to these comments are provided under *Section 3 – Revisions to the Initial Study/Mitigated Negative Declaration*. The revisions have been added to clarify existing information; however, none of the revisions introduce significant new information. The comments are noted by the City and have been considered as part of the planning and implementation of the project.

2.3.1 FRIENDS OF DEL PASO PARK

From: [Chas Duck](#)
To: [Ron Bess](#)
Subject: Fw: I was lied to
Date: Wednesday, October 4, 2023 8:39:44 PM

FoDPP

Mr. Bess
I was lied to by Raymond many times, saying that it was too late to change the plan for Renfree.

I have been coaching for over 50 years. I know parks and what happens with their use. I tried to show Raymond and others about the problems associated with the renovation but it all fell on deaf years.

Please, this is going to be a waste of money and end up like Renfree is now in just a few years, but it doesn't have to be that way. A few reasonable changes and maintenance goes down and productivity goes up.

Please sir, don't let this go on the way it is. It would be a shame.

Thank you
Charley Duckworth
Friends of Del Paso Park
702 418 7834 ANYTIME

[Sent from Yahoo Mail on Android](#)

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

From: "Chas Duck" <duckphoto@yahoo.com>
To: "Ron Jellison" <jukebox@jps.net>, "Doug Ose" <dougose@hotmail.com>, "Juliette Porro" <juliette_porro@hotmail.com>
Sent: Mon, Oct 2, 2023 at 8:22 PM
Subject: Harry Renfree Field Renovation
Looking for input

Dear Ron
The renovation of Renfree Field has many problems:

1. The City of Sacramento has no budget for maintaining this Renovation. This park has a long history of an influx of funds then left to rot. The City of Sacramento is, something like \$1.2 million in deferred maintenance for City run parks. This Renovation is likely to fall in to attractive nuisance that is the SOP for this "park too far." They look good on paper and because there is no management and no pressure from Sacramento citizens because this park is essentially in the county, it soon falls in to an attractive nuisance. When asked about this, we were told: we are very creative in raising funds for maintenance. Really? Renfree was the premier Baseball Field in Sacramento for years. Why weren't you even creative enough to keep Renfree going?

2. The Baseball fields and the soccer field in the present design over lap. The hardball diamond has no permanent fence. This really detracts from the desirability of use.

FoDPP-1

FoDPP-2

FoDPP-3

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2b. This will require the set up of temporary fence for Baseball, or no fence or set up and removal by who? It also limits income by limiting the ability to play a baseball game or 2 and a soccer game at the same time The only reason to do a multi use field is because it's trendy. But certainly dies not fall in to "creative " I have been to many multi use fields and, for safety reasons, they never over lap goalie boxes and outfielders. And to do so is unwise and hazardous.

↑
FoDPP-3
con't

3. Gaolie boxes chew up any field they play on. It's in the nature of the game. So both diamonds will have hazardous areas in the outfielders. How long before a law suit comes in with a child hurt from lack of maintenance? But of course, the lawsuit is not really the issue, what if it, for lack of planning a child suffers from a serious brain injury or worse.

↑
FoDPP-4

3b continuing on why the multi use field is a bad idea.... The parking lot along Bridge rd has long been an issue for the neighborhood. There is plenty of room to expand the parking lot on Auburn blvd and use the area that is the dilapidated lot adjacent to Bridge rd for the soccer field. This eliminates the hazardous over lay of the soccer baseball and connects the parking lots for ease of patrol by park rangers. It also eliminates the potential for a traffic jams to/from the neighborhood in case of emergency.

↑
FoDPP-5

3c It would be foolish to not recognize the issues associated with East Del Paso park. Eliminating the parking on Bridge rd and making the only access to the Habitat be through the small parking off Auburn blvd, in the last few years, has greatly reduced the activity that is not welcome to any park. This area was left to the lawbreakers for over 30 years.

↑
FoDPP-6

We, the community have bound together to report problems and do clean up. It is far better now than 10 years ago. We do not want to see it return and a parking lot will not be helpful to the park and to the community.

That being said, homeless camps, drug dealing, and sex seeking and providers are still an issue. Allowing a side street entrance would encourage those who want to misuse the park to return without fear. Returning this park to the unvisited dump A waste of this valuable opportunity. A larger parking lot on Auburn blvd would make everyone be more visible and the park safer.

↑
FoDPP-6

4. Our group had brought up all these issues to park management previously and all I got was excuses. Including the obvious lie: " It too late to change anything" about 6 months or more ago.

↑
FoDPP-7

5. Lastly, was this grant given before there was a homeless shelter less than about 700 feet from the park? Who will bring their children to the park with the homeless being released in to the park and neighborhood every morning? (Let me say here, not all homeless people are bad... but some are) Will the parking lot be safe to park in? Would you leave your kids here to play a game? With the parking along Bridge being the easiest and unsupervised entry to the park?

↑
FoDPP-8

For your actual consideration please
Charles Duckworth
Friends of Del Paso Park
702 418 7834 ANYTIME

If you would like to talk to me or our steering group please call

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Response to Letter from Friends of Del Paso Park

Comment No.	Response
FoDDP-1	<p>The comment expresses concern for park design and use conflicts, the cost of existing and future maintenance, and the use of limited City funds.</p> <p>The City received a \$3.25 million State Park and Recreation Grant for Improvements at Del Paso Regional Park Recreation Area in 2022.¹ A summary of outreach measures is included at the bottom of the fact sheet (see footnote below).</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
FoDDP-2	<p>The comment expresses general concern regarding City budgeting and the availability of funding for park maintenance efforts.</p> <p>See comment response FoDDP-1, above.</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
FoDDP-3	<p>The comment expresses concern regarding the project design and overlapping multi-use recreation fields, specifically lack of a baseball outfield fence and the overlap between the soccer goals and baseball outfield.</p> <p>The City of Sacramento Youth, Parks & Community Enrichment Department (YPCE) maintains parks and recreational facilities within the city of Sacramento and would be responsible to ensure the ground disturbance from soccer goal posts does not present hazards to players.</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
FoDDP-4	<p>The comment expresses concern regarding the project design, specifically the ground disturbance from concentrated activities in front of the soccer goals to be located in the outfield area of the proposed baseball fields and potential for injury to players because of differences in the outfield surfaces.</p> <p>See comment response FoDDP-3, above.</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>

¹ City of Sacramento. 2023. State Parks and Recreation Grant and Renfree Field Park Improvements Fact Sheet. Available at: https://www.cityofsacramento.org/-/media/Corporate/Files/ParksandRec/Parks/DelPasoRegional/DPRP-CA-StateParks-Grant_Projects-Fact-Sheet_Augus2023.pdf?la=en. Accessed November 10, 2023.

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Comment No.	Response
FoDDP-5	<p>The comment notes design and operational concerns (public safety and emergency evacuation) with the proposed reuse of the existing parking lot along Bridge Road, suggesting that the concerns with the overlapping field design be resolved by redeveloping the existing western parking lot for a soccer field and consolidating all parking on the eastern parking lot and proposing an expansion along Auburn Boulevard. The comment also notes evacuation hazards because of traffic with increased park use.</p> <p>As discussed under Transportation and Circulation Checklist Questions A, C, and D (pp. 86–89) of the Public Review Draft IS/MND, the project would not introduce new uses or changes to roadway designs or alignments and would not conflict with any adopted transportation plans and would therefore result in a less-than-significant impact related to emergency access and/or evacuation (p. 89). As discussed under Public Services Checklist Question A (p. 83) of the Public Review Draft IS/MND, the proposed project would result in a park renovation; thus, it would not implement new uses or square footage of development on-site and would not increase the number of city residents, require the need for new facilities, or increase the demand for police and fire protection services. Please also note that Park Road has two exits—one at Bridge Road and one on the eastern side of Del Paso Regional Park where Park Road intersects with Auburn Boulevard. Under Section III, Discussion (p. 19) of the Public Review Draft IS/MND, the conclusion was made that the project would not impair emergency response or evacuation.</p> <p>No changes to the IS/MND are required in response to this comment. This comment is noted and has been provide to City decision-makers for consideration</p>
FoDDP-6	<p>The comment notes the current state of the park and the homelessness near Arcade Creek. The comment requests that the parking lot be relocated to Auburn Boulevard.</p> <p>The proposed project would include a total of 77 surface parking spaces, reducing the on-site parking total by approximately 50 spaces. While there is a reduction of parking, the northern part of the parking lot would become four pickleball courts. Approximately 35,882 square feet of asphalt and aggregate would be removed in the northwestern portion of the western parking lot, near Arcade Creek. Development of the project would allow for recreational activities, including sports games and group use, reducing the desirability for illegal activities.</p> <p>See comment response FoDDP-5, above.</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
FoDDP-7	<p>The comment notes discussions with park management and the history of concerns on potential park design, neighborhood needs, and safety concerns.</p> <p>The comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>

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Comment No.	Response
FoDDP-8	<p>The comment expresses general concern for park safety and notes the homeless shelter in the project vicinity.</p> <p>See comment response FoDDP-5, above. As discussed under Public Services Checklist Question A (p. 83) of the Public Review Draft IS/MND, the proposed project would result in a park renovation; thus, it would not implement new uses or square footage of development on-site and would not increase the number of city residents, require the need for new facilities, or increase the demand for police and fire protection services.</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>

2.3.2 SACRAMENTO AUDUBON SOCIETY



SAS

October 2, 2023

Mr. Ron Bess, Associate Planner
Community Development Department
300 Richards Boulevard
Sacramento, CA 95811

RE: Draft Mitigated Negative Declaration
Harry Renfree Field Renovation Project
Del Paso Regional Park

Dear Mr. Bess:

Sacramento Audubon Society represents 619 members located primarily within the City of Sacramento and surrounding areas of Sacramento County. We support the appropriate development of parks and recreation facilities to serve the outdoor needs of those in the Sacramento region. Part of the mission of the Sacramento Audubon Society is to protect birds and their habitat. While Renfree Field is a degraded environment, it still serves as habitat, in its current iteration. We have reviewed the relevant documents found in the “Notice of Availability/Intent to Approve the Harry Renfield Field Renovations at Del Paso Regional Park” and are concerned about some negative effect this project may have on birds who roost, nest, and forage in the Renfree Field area.

Most pressing is the effect the project will have on the Yellow-billed Magpies who roost and nest atop the light pole platforms and forage on the field area (at least when it is kept mowed). The Yellow-billed Magpie is endemic to California and its conservation status vulnerable as a result of dramatic (>85%) declines due to West Nile virus (Airola et al. 2007, Pandolfino 2020). Recent studies have shown that Renfree Field and the surrounding woodland supports at least 27 pairs of nesting magpies, one of the largest colonies in the Sacramento region (Airola et al. 2021, Airola 2023). Nine of these nests were on the light poles at the field.

We believe this project will detrimentally impact this magpie population if the existing light poles are removed and any new ones do not have the walkways that magpies use for nest support. The design structure of the new field lights is not discussed in the documents except for the lighting. Will the new lights have a platform the magpies can use? Light poles with a suitable platform for magpies would be one form of mitigation.

SAS-1

Removal of the existing lights during the magpie nesting season could cause mortality to eggs or nestlings, which would violate the Migratory Bird Treaty Act and Fish and Game Codes. Ideally, pole removal should occur in the non-breeding season (July 1 to January 1). The restoration of turf to the field area would be beneficial by providing foraging habitat for the magpies, as long as pesticide use is minimized (see below).

↑
SAS-1
con't

We were surprised to see that the onsite bird survey taken of the area by SWCA Environmental Consultants for the Biological Resources Evaluation was performed only one day in December 2022. A single day's survey in winter does not fully characterize bird species in the area. A survey in April-June breeding season would have provided a more complete picture of birds found in the Biological Survey Area. We acknowledge, however, that the consultants included information from the nearly 600 checklists recorded in eBird as part of their background research. They did note accurately that two special status species, the migratory Purple Martin and Swainson's Hawk, have potential to use the park during the breeding season. The martin could occur only while foraging, as it nests in elevated freeways and overcrossings, such as along Roseville Road west of the project area (Airola 2020). The Swainson's Hawk has potential to nest in woodlands within Del Paso Regional Park (Pandolfino et al. 2021).

↑
SAS-2

Owl Creek Terrace is to be hydroseeded with a "pre-selected herbaceous mix." The area is a predominantly weed-filled field, and weeds usually win unless a careful eradication plan is in place. The herbaceous seed mix should be composed of native plants that are appropriately sourced and should include species that will support native pollinators. Owl Creek Terrace offers a real opportunity to create habitat for birds – especially insectivores. We encourage you to consult with the California Native Plant Society and those with local experience in restoring herbaceous communities at Del Paso Regional Park (e.g., Tim Vendlinski) so that this area can resemble what it was before the City allowed it to be used as a dumping ground for dirt from the east side parking lot construction. Don't miss this opportunity to undo some of the environmental damage that has occurred at DPRP. Lastly, if not already planned, a barrier should be erected to prevent motorists from parking in the field if the parking lots are full.

↑
SAS-3

We are concerned about both the potential impacts a busy recreational facility will have on the birds of DPRP, especially the detrimental effects of night lighting. Because Renfree Field will be open until 10 pm, it is important that lighting be automated so as to turn on only when the field is in use, thus minimizing these impacts.

↑
SAS-4

We are very concerned about the potential use of rodenticides at the park to control rodents. With the influx of people to the recreation areas, there will be more trash, which in turn, will attract rodents and other animals. If rodenticides are used, it is likely that raptors and corvids, including Yellow-billed Magpie, will be poisoned from eating dead or dying rodents. We request a project commitment that rodenticides will not be used in rodent control and that the City employ the non-toxic approach of frequently collecting trash to discourage rodent use and population build-up.

↑
SAS-5
↓

We are also very concerned about the possibility of regular and excessive use of herbicides and

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insecticides in maintaining the playing fields. Insecticides, such as neonicotinoids, may cause direct mortality to birds and reduce insect populations that they depend upon. We encourage the City to formally adopt an integrated pest management approach that minimizes use of either of these classes of chemicals.

↑
SAS-5
con't

Several positive aspects of this project for birds and other wildlife include the retention of the project within its original footprint and, consequently, not expanding into the woodland areas. Reducing the number of parking spaces and not increasing the amount of impervious surfaces is to be applauded, although we do encourage including EV charging stations in at least one of the lots. Replacing trees to be removed with native trees, ideally properly sourced, and ensuring the protection of existing trees near construction areas is also commendable. Ensuring that construction staging remains within the existing parking areas is important to avoid damage to the surrounding areas. All of the above measures should be carried forth into project planning, design, and implementation to minimize or mitigate the project impacts on the park.

↑
SAS-6

We are pleased for the neighboring community that they will have a new recreational complex to enjoy. We hope the increase in visitors will bring a greater appreciation for DPRP in general and of its natural features, and that it will reduce unlawful uses. As one of the last strongholds of oak woodlands, riparian forest, and grasslands within the City of Sacramento, it is truly a special place. We, at Sacramento Audubon Society, offer our knowledge to the City as it balances the co-existence of birds and humans. We appreciate your taking the time to review our comments and look forward to seeing your responses in project environmental documents.

↑
SAS-7

Sincerely,



Paul Miller, President
Sacramento Audubon Society
P.O. Box 160694
Sacramento, CA 95816-0694
sacaudubonpresident@gmail.com

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Literature Cited

- Airola, D.A. 2020. Life Under the Fast Lane: Ecology and Conservation of the Bridge-Nesting Purple Martins in Urban Sacramento, California. Central Valley Bird Club Special Publication No. 1.
- Airola, D. A. 2023 (in press). Recent increase in the Yellow-billed Magpie population in Sacramento and its possible causes. *Western Birds* 54.
- Airola, D. A., Douglas, L. A., and Airola, L. 2021. Yellow-billed Magpie population status and habitat characteristics in urban Sacramento, California. *Western Birds* 52:222–239; doi.org/10.21199/WB52.3.3.
- Airola, D. A., Hampton, S., and Manolis, T. 2007. Effects of West Nile Virus on sensitive species in the lower Sacramento Valley, California: An evaluation using Christmas Bird Counts. *Central Valley Bird Club Bulletin* 10:1–23.
- Pandolfino, E. R. 2020. Continuing impacts of West Nile virus on the Loggerhead Shrike and other birds in California's Central Valley. *Central Valley Birds* 23:18–23.
- Pandolfino, E.R., L. A. Douglas, T.D. Manolis, and C. Conard. 2021. Sacramento County Breeding Birds: A Tale of Two Atlases and Three Decades of Change. Central Valley Bird Club Special Publication No. 2. Davis, CA.

Response to Letter from Sacramento Audubon Society

Comment No.	Response
SAS-1	<p>The comment describes the Sacramento Audubon Society and expresses general concern for the yellow-billed magpie, which roost in the light poles and forage on the field, noting the beneficial aspect of the turf replacement as improved foraging habitat depending on the City's integrated pest management control strategies. The comment recommends platforms on the light poles for magpies and limited use of pesticides.</p> <p>The IS/MND has been updated to ensure that light pole removal would not occur during nesting season. Text revisions have been included in the errata below under <i>Section III – Environmental Checklist and Discussion, Biological Resources</i>.</p> <p>Regarding platforms on light poles, SWCA biologists note that installing platforms on the new light poles may lead to maintenance issues during project operation. Maintenance activities have the potential to disturb nesting magpies. There is suitable nesting habitat in the oak trees in the vicinity of the project where magpies can nest. The comment is noted.</p> <p>No additional changes to the IS/MND are required in response to this comment.</p>
SAS-2	<p>The comment expresses concern regarding the timing of the site visit conducted for the Biological Resources Evaluation and supports conclusions for Swainson's hawk and purple martin.</p> <p>SWCA confirms that the Biological Resources Evaluation site visit was conducted in December. The site visit was conducted to note presence of special-status species, or those that may require further mitigation beyond proposed Mitigation Measure BIO-1, Birds Protected by the MBTA or the California Fish and Game Code (p. 44). Because the study was completed in December, databases such as eBird were evaluated to confirm presence or site suitability for other special-status species. Mitigation Measure BIO-1 is recommended to reduce potential impacts to birds to a less-than-significant level. See Appendix C of the IS/MND for further discussion of conclusions for bird species.</p> <p>No additional changes to the IS/MND are required in response to this comment.</p>
SAS-3	<p>The comment notes past use of Owl Creek Terrace as the location of soils excavated for development of the eastern parking lot and for overflow parking, and expresses concern regarding its resultant habitat value and the need for Owl Creek Terrace restoration efforts to include outreach on the proper herbaceous mix for hydroseeding. The comment also recommends the placement of a barrier to restrict potential for use as overflow parking after restored.</p> <p>SWCA biologists concur with the recommendations that grading and hydroseeding would enhance the quality of this habitat and that a fence barrier would limit potential future impacts. The City has confirmed that commercially available recommended native seed mix for Owl Terrace would be used (Appendix A).</p> <p>The IS/MND has been clarified to note this change.</p>

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Comment No.	Response
SAS-4	<p>The comment expresses concern regarding lighting and the impacts to birds in the vicinity.</p> <p>SWCA understands that lighting of the recreation facility could have potential impacts on birds in Del Paso Regional Park. The proposed lighting posts would be affixed with energy-efficient light-emitting diode (LED) light fixtures, which would be designed to eliminate disruptive glare to nearby homes and reduce light pollution to the night sky. The lighting for the field and court lights would be on a timer and scheduled by recreation staff to shut off at 10:00pm.</p> <p>The IS/MND has been clarified to note this change. This comment is noted and has been provided to City decision-makers for consideration.</p>
SAS-5	<p>The comment expresses concern regarding the use of rodenticides and insecticides.</p> <p>The City has confirmed that no rodenticides or insecticides would be used (Appendix A).</p> <p>The IS/MND has been clarified to note this change. This comment is noted and has been provided to City decision-makers for consideration.</p>
SAS-6	<p>The comment provides general support for project design and recommends electric vehicle charging infrastructure in redesigned parking area.</p> <p>Electric vehicle charging infrastructure would occur as a separate Department of Public Works project. Public Works is implementing EV chargers in specified areas. See City webpage: https://www.cityofsacramento.org/Public-Works/Electric-Vehicle-Initiatives/EV-Strategy</p> <p>No changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
SAS-7	<p>The comment provides general support for project design.</p> <p>No changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>

2.3.3 PACIFIC GAS AND ELECTRIC COMPANY



Plan Review Team
Land Management

PGEPlanReview@pge.com

October 3, 2023

PGE

Ron Bess
City of Sacramento
300 Richards Blvd, 3rd Flr
Sacramento, CA 95811

Re: L19-3000-02
Harry Renfree Field Renovations Project at Del Paso Park

PGE-1

Dear Ron Bess,

Thank you for providing PG&E the opportunity to review the proposed plans for L19-3000-02 dated 9/6/2023. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: <https://www.pge.com/cco/>.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at pgeplanreview@pge.com.

Sincerely,

PG&E Plan Review Team
Land Management

Public

Response to Letter from Pacific Gas and Electric

Comment No.	Response
PGE-1	<p>The comment notes general PG&E processes and provides contact information for project changes.</p> <p>The comment does not identify any deficiency in the Public Review Draft IS/MND, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>

2.3.4 BUENA VISTA RANCHERIA OF ME-WUK INDIANS

BVR

From: [Jesus "Jesse" Galvan](#)
To: [Ron Bess](#)
Cc: [Ivan Senock](#); [Tribal Historic Preservation Office](#)
Subject: Harry Renfree Field Renovations Project at Del Paso Regional Park (L19-3000-02)
Date: Wednesday, October 4, 2023 3:55:50 PM

October 4, 2023

Ron Bess
City of Sacramento
Community Development Department
300 Richards Boulevard Sacramento, CA 95811

RE: Harry Renfree Field Renovations Project at Del Paso Regional Park (L19-3000-02)

Dear Ron Bess

BVR-1

I write on behalf of the Buena Vista Rancheria (BVR) of Me-Wuk Indians, Ione, CA, regarding the notification received by this office September 6, 2023. The notification references Harry Renfree Field Renovations Project at Del Paso Regional Park (L19-3000-02). We appreciate your effort to contact us and wish to respond.

After review of the notification and examination of the property using the Google Earth mapping application, it is determined BVR has no objection to commencement of the project.

If Tribal Cultural Resources (TCR) should be inadvertently encountered, during the project, Buena Vista Rancheria requests additional notification so steps may be taken to protect and preserve them.

Respectfully,

Ivan Senock
THPO/Cultural Resources Director
Buena Vista Rancheria of Me-Wuk Indians.

Jesse Galvan
Cultural Heritage Specialist
Buena Vista Rancheria of Me-Wuk Indians (Tribe)
4650 Coal Mine Rd,
Ione, CA 95640
Office: (916) 491-0011

Response to Letter from Buena Vista Rancheria of Me-Wuk Indians

Comment No.	Response
BVR-1	<p>The comment notes general outreach efforts and requests that if tribal cultural resources (TCRs) are encountered, that work stops immediately.</p> <p>Under the Tribal Cultural Resources section (pp. 95–96) of the Public Review Draft IS/MND, Mitigation Measure TCR-3, Unanticipated Discovery Protocols, have been recommended in the event that TCRs are encountered.</p> <p>The comment does not identify any deficiency in the Public Review Draft IS/MND, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>

2.3.5 CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD



Central Valley Regional Water Quality Control Board

6 October 2023

RWQCB

Dennis Day
City of Sacramento
Youth, Parks & Community Enrichment
915 I Street, 4th Floor
Sacramento, CA 95811
DDay@cityofsacramento.org

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, HARRY RENFREE FIELD RENOVATIONS PROJECT AT DEL PASO REGIONAL PARK (L19-3000-02), SCH#2023090065, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 6 September 2023 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Harry Renfree Field Renovations Project at Del Paso Regional Park (L19-3000-02), located in Sacramento County.

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

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as

RWQCB-1



MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

Harry Renfree Field Renovations Project - 2 -
at Del Paso Regional Park (L19-3000-02)
Sacramento County

6 October 2023

required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

RWQCB-1
con't

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

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 and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-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

RWQCB-2

Harry Renfree Field Renovations Project - 3 -
at Del Paso Regional Park (L19-3000-02)
Sacramento County

6 October 2023

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

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

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

RWQCB-2
cont

RWQCB-3

RWQCB-4

RWQCB-5

HARRY RENFREE FIELD RENOVATIONS PROJECT
AT DEL PASO REGIONAL PARK (PROJECT NO. L19-3000-02)
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Harry Renfree Field Renovations Project - 4 -
at Del Paso Regional Park (L19-3000-02)
Sacramento County

6 October 2023

information on the General Order 2004-0004, visit the State Water Resources Control Board website at:
https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

↑
RWQCB-5
con't

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

↑
RWQCB-6

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

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

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

↑
RWQCB-7

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

↑
RWQCB-8

HARRY RENFREE FIELD RENOVATIONS PROJECT
AT DEL PASO REGIONAL PARK (PROJECT NO. L19-3000-02)
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Harry Renfree Field Renovations Project - 5 -
at Del Paso Regional Park (L19-3000-02)
Sacramento County

6 October 2023

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

Peter Minkel

Peter Minkel
Engineering Geologist

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

Response to Letter from Central Valley Regional Water Quality Control Board

Comment No.	Response
RWQCB-1 through RWQCB-8	<p>The comments provide a summary of the Central Valley Regional Water Quality Control Board's (Central Valley Water Board) standard requirements related to water quality regulations and permitting and does not specifically address the adequacy of the IS/MND.</p> <p>No changes to the IS/MND are required in response to this comment. These comments are noted and have been provide to City decision-makers for consideration.</p>

HARRY RENFREE FIELD RENOVATIONS PROJECT
AT DEL PASO REGIONAL PARK (PROJECT NO. L19-3000-02)
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

2.3.6 JULIETTE PORRO

From: [Juliette Porro](#)
To: [Ron Bess](#)
Subject: Harry Renfree Field Renovations Project at Del Paso Regional Park
Date: Friday, October 6, 2023 4:58:37 PM

JP

Mr. Ron Bess,

Thank you for the opportunity to provide comments.

I don't think this project will benefit the county residents that surround the park in the long term unless it is maintained in good condition and the park use rules and regulations are enforced. The city of Sacramento does not have a maintenance budget for the ongoing needs that will be required to sustain this once the project is complete. It is \$120 million in arrears for deferred maintenance costs. If there are special funds outside of parks maintenance they will go towards other areas in the city.

JP-1

This is because there are no city residents living within 2 miles.

JP-2

When one reviews a history of this park going back to the time it was purchased in 1911 and considers that it has never been held as a priority compared to other city parks, it would seem to make sense that this park be taken over by the County of Sacramento or another park service district to meet the ongoing needs.

JP-3

It's very disheartening that pieces of this park have been taken away from park grounds decreasing the recreational green space and nature areas that should have been preserved and taken care of for park visitors to enjoy.

Given all of the above, if this project moves forward I feel it would be in everyone's best interest to allow the project to be maintained by someone other than the city of Sacramento parks, and ultimately for the park east of Watt avenue to be transferred out of the city of Sacramento.

Sincerely,

Juliette Porro

HARRY RENFREE FIELD RENOVATIONS PROJECT
AT DEL PASO REGIONAL PARK (PROJECT NO. L19-3000-02)
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Response to Letter from Juliette Porro

Comment No.	Response
JP-1 and JP-2	<p>The comment expresses general concern regarding park management and maintenance. The comment also notes that there are no City residents within 2 miles in relation to comment JP-1, above.</p> <p>The City received a \$3.25 million State Park and Recreation Grant for Improvements at Del Paso Regional Park Recreation Area in 2022.² A summary of outreach measures is included at the bottom of the fact sheet (see footnote below). The City of Sacramento Youth, Parks & Community Enrichment Department (YPCE) maintains parks and recreational facilities within the City of Sacramento and would be responsible for management and maintenance.</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
JP-3	<p>The comment expresses general concern regarding park management and maintenance.</p> <p>See comment response JP-3, above.</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>

² City of Sacramento. 2023. State Parks and Recreation Grant and Renfree Field Park Improvements Fact Sheet. Available at: https://www.cityofsacramento.org/-/media/Corporate/Files/ParksandRec/Parks/DelPasoRegional/DPRP-CA-StateParks-Grant_Projects-Fact-Sheet_Augus2023.pdf?la=en. Accessed November 10, 2023.

2.3.7 TIM VENDLINSKI

**Comments from Tim Vendlinski (submitted 10/02/23)
City of Sacramento**

TV

HARRY RENFREE FIELD RENOVATIONS PROJECT
AT DEL PASO REGIONAL PARK (PROJECT NO. L19-3000-02)
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION (IS/MND)
September 2023

[page 4] **Surrounding Land Uses** The 630-acre Del Paso Regional Park includes three golf courses, called the Haggin Oaks Golf Complex; lighted ball fields; and other recreational features, including picnic areas, a sand volleyball court, a play structure and area, restrooms, and the Sacramento Softball Complex. The Sacramento Horsemen's Association is also located within the park boundaries, and the park trails are used by equestrians. ~~Substantial portions of the park are designated natural habitat areas, generally along the Arcade Creek riparian buffer zone and east of Renfree Field.~~

TV-1

COMMENT: Please Name the Natural Areas in Del Paso Regional Park

Per two Resolutions passed unanimously by the City Council in 1985 and 2002¹, one-hundred acres within Del Paso Regional Park (Park) were designated as permanently protected natural habitat in four units:

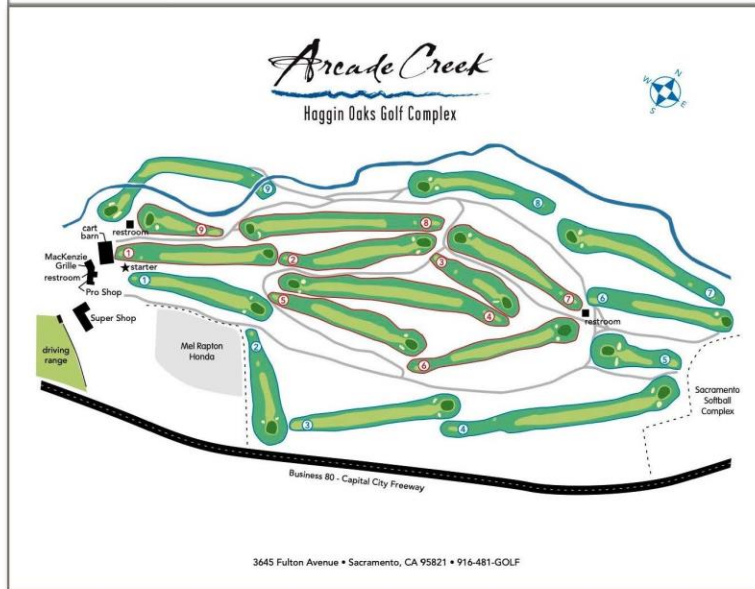
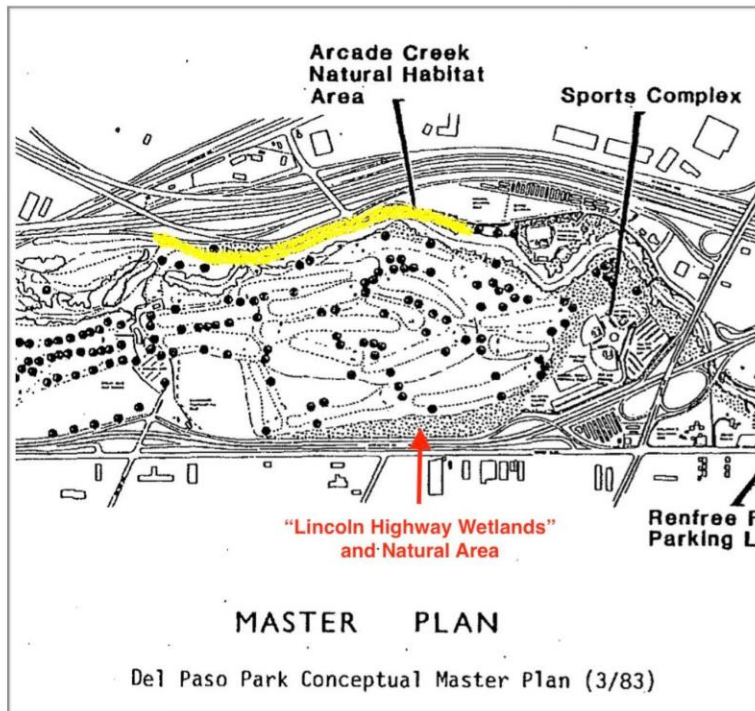
- (1) **East Side Natural Area** (east of Renfree);
- (2) **Arcade Creek Natural Area** - a protected corridor running east to west from the Auburn Blvd. Bridge at Winding Way and westward to encompass the "blue" 9th hole of the Arcade Creek Golf Course {see bottom map below on page #2 of these comments};
- (3) **West Side Natural Area** west of Watt Avenue that wraps around the Softball Complex and connects to the "Lincoln Highway Wetlands" and Natural Area (situated parallel with SR-51 (Cap City Freeway) and contiguous with "Blue" fairways #3 and #4 on the Arcade Creek Golf Course; and
- (4) **Longview Oaks Preserve** situated west of the Capitol City Recycling Inc. and north of Longview Drive.

[page 4] The project site contains a walking trail and an equestrian trail loop that connects to the larger Del Paso Regional Park. The walking trail begins near the playground and western parking lot area and extends east around the existing baseball field's outfield along the natural area near Arcade Creek, where it joins with the equestrian trail near the northeastern project boundary

TV-2

¹ <https://www.cityofsacramento.org/ParksandRec/Parks/Park-Directory/Arden-Arcade/Del-Paso-Regional-Park/Resources>

HARRY RENFREE FIELD RENOVATIONS PROJECT
AT DEL PASO REGIONAL PARK (PROJECT NO. L19-3000-02)
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION



TV-2
con't

COMMENT: Restore the Connectivity of the Park and the Trail System

Illegal encampments by unhoused people beneath the three bridge under-crossings to the west and degraded conditions of the trail surface have fragmented the trail system, and limit recreational activities within the Park. The City, County, and the State should pool resources for law enforcement and land management to permanently remove the encampments, and renovate the trails through updated stormwater management and trail stewardship so the Park can be returned to status as a truly regional resource.

[page 6] Adjacent to the project site on the north, east, and west are Arden Arcade Creek and areas mostly composed of natural oak woodlands and open space.

Proposed Project Characteristics

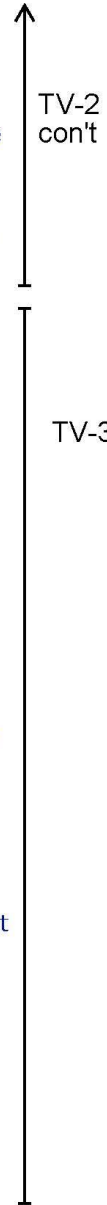
[page 9] A parking gate would be placed at the entry and a bioswale would provide stormwater filtration prior to entering the storm drain. [page 12] Stormwater runoff from impervious surfaces on the project site such as the western parking lot would be directed to a new bioswale to be located near the site's southern border at the park entry. A parking gate would be placed at the entry and the bioswale would provide stormwater filtration prior to entering the storm drain.

COMMENT: Install Stormwater Infrastructure and Demarcate Oak Conservation Zones: Bioswales should be installed on the east and west margins of Bridge Road, and consideration should be given for routing stormwater into the restored seasonal wetlands within Owl Creek Terrace rather than routing stormwater into a storm drain that discharges directly into Arcade Creek². Every effort should be made for capturing, filtering, and retaining stormwater on Owl Creek Terrace, and promoting its infiltration into the local aquifer that can provide essential "baseflows" Arcade Creek.

At the northern edge of the existing "western parking lot" within the development envelope for the basketball and pickle ball courts, a bioswale should be installed in an east-west direction to capture stormwater runoff from the hardscape. This feature should be designed to demarcate a protection zone for the grove of wild oak seedlings and saplings that are the progeny of the legacy oaks lost to historical ground disturbance and anthropogenic stressors (please see in-depth discussion below on pages 11-14). The City should count the protection of these wild trees as mitigation as their future is not currently secure, and mitigation credit should be afforded to the City for the protection of these trees.

² Next generation swale design for stormwater runoff treatment: A comprehensive approach (2021). <https://www.sciencedirect.com/science/article/pii/S0301479720316819>

Flood Control 2.0; San Francisco Estuary Institute
<https://www.sfei.org/projects/flood-control-20>



[page 11] New lighting for the baseball fields would replace the existing light towers and would be oriented along the perimeter of the field to accommodate lighting for the two baseball fields and soccer field. There would be approximately eight new approximately 60-foot-tall light towers, which are the same number and height as the existing light towers that would be removed.

[page 12] ... Approximately nine new light posts would be installed in the western parking lot. The project would include installation of field lighting that would consist of approximately eight 60-foot-tall light poles around the proposed baseball fields and soccer fields. Additional light poles would be installed throughout the parking lot. After completion of construction, there would be 17 light posts/towers on the project site. See **Figure 6: Proposed Excavation Plan**. The poles would be affixed with energy-efficient LED light fixtures that would be designed to eliminate disruptive glare to nearby homes and reduce light pollution to the night sky.

[page 20] While the proposed project would introduce new sources of light to the project site, the type and intensity of light would be downcast to avoid spillover, resulting in less spillover than the historic lighting.

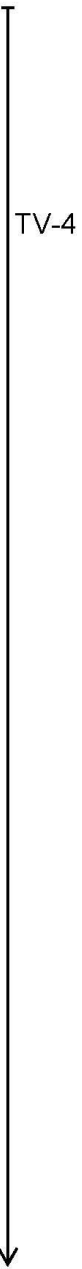
[page 22] • **Policy ER 7.1.3: Lighting** requires the City to minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary, and requiring light for development to be directed downward to minimize spill-over onto adjacent properties and reduce vertical glare.

COMMENT: Protect Natural Areas and Dark Skies from Glare

Light pollution harms wildlife and ecosystems. The approach to illumination described in the IS/MND are very encouraging, but the City should specifically commit to incorporating “Dark Skies” features and principles into the Renfree Renovation Project minimizing “leakage” and glare from the new lighting fixtures into the riparian corridor and designated Natural Areas. With this once-in-a-lifetime investment, the City can provide illumination and security while also demonstrating protection for wildlife, ecosystems, and the night sky.

It appears the City missed such an opportunity in 2022 when a \$350,000 lighting retrofit³ for the Sacramento Softball Complex was approved without incorporating Dark Skies features and principles. This missed-opportunity is especially regrettable as the Natural Areas within the Park have been degraded by extreme illumination, particularly within the West Side Natural Area where SMUD cleared the oak forest perimeter around the Softball Complex without an encroachment permit in 2018. Also on the western end of the Park, Longview Oaks Preserve has been severely degraded with light pollution resulting from the trespassing and unauthorized removal of the City’s oaks by the Longview Drive Self Storage company in 2013 and 2022, and the installation of numerous super high-intensity security lights that shine brightly into the Park’s Natural Areas.

³ City Council Report; Consent Item #12; May 24, 2022
https://sacramento.granicus.com/MetaViewer.php?view_id=22&clip_id=5281&meta_id=683934



Owl Creek Terrace Needs a Restoration Plan not a Landscaping Plan

[page 14 (326)] The [Biological Survey Area] does not contain any wetlands or waters that could potentially be considered jurisdictional by the USACE, RWQCB or CDFW. However, the BSA contains a sliver of Valley Oak Riparian Woodland along its northern boundary bordering Arcade Creek. Additionally, the BSA borders Owl Creek to the west, which is a tributary to Arcade Creek. Arcade and Owl Creeks are likely jurisdictional WOTUS and waters of the state; therefore, impacts to riparian habitat associated with these features would likely be regulated by the CDFW pursuant to CFGC Sections 1600 through 1607.

[pages 11, 116, 2 (314)] Grading of the Owl Creek Terrace and subsequent hydro-seeding with a pre-selected herbaceous mix would occur immediately west of Bridge Road, where excess soil was placed as part of the development of the 21-space parking lot on the east side of the project site.

[page 15] Construction activities in the western area of the project site across Bridge Road (Owl Creek Terrace) would include grading and hydroseeding... The proposed project would include sidewalk construction along the north side of Auburn Boulevard from Bridge Road to the edge of the Owl Creek Terrace area and... storm drainage, and bioswale development and landscaping.

[page 45] **Root Pruning:** The grading of the undeveloped field west of Bridge Road has the highest potential for encountering tree roots 2 inches in diameter or greater. For all tree roots encountered during project construction activities, roots shall be cut with a sharp instrument such as hand pruners or a Sawzall and cut cleanly at the edge of the approved construction. Tree roots shall not be twisted, ripped, or broken off by construction equipment. Roots greater than two inches in diameter shall be evaluated by the ISA-certified arborist prior to pruning.

[page 138; Sheet No. LP101 of XX] MAINTENANCE SHALL INCLUDE... WATERING, WEEDING, TRIMMING, FERTILIZING, SPRAYING INSECT AND PEST CONTROLS...

[page 16 (416) APPENDIX F, Arborist Report] Dudek recommends that the city plant replacement trees... In the undeveloped area west of Bridge Road.

COMMENT: The IS/MND for the Renfree Renovation Project should contain a scientifically-rigorous restoration plan for the seasonal wetland and surrounding grassland prairie Owl Creek Terrace. Unfortunately, the only detail provided for this element in the IS/MND is the diagram and “planting notes” at page 138; Sheet No. LP101 of XX. This is a landscaping plan and not a restoration plan. The proposed planting plan for Owl Creek Terrace needs to be CANCELLED and replaced with a planting palette for native forbs, geophytes, and grasses characteristic of seasonal wetlands and transition zones to upland prairies within the Sacramento Valley (see the planting palette below on page 7).

NONE of the shrubs and trees proposed for installation should ever be planted.

TV-5

The goals and objectives of this element should be to restore the functions and values of a seasonal wetland and grassland/prairie mosaic that were compromised or destroyed by human activities. The “restoration baseline” should be dialed back to 2002 or earlier before the three most recent disturbance events when the wetlands and surrounding uplands were graded, filled, and compacted in 2005, 2013, and 2018 (see the sequence of satellite images below on page 10).

There are unique and desirable ecological processes that occur when plant communities characteristic of seasonal wetlands and grasslands/prairies are situated at the confluence of two creeks. This landscape mosaic is on display within the Park at Longview Oaks Preserve and could be replicated here. This alternative approach also avoids the astronomical cost of purchasing, planting, and maintaining hundreds of nursery-grown shrubs and trees within a neglected riparian corridor already cluttered with non-native shrubs and trees. **Owl Creek Terrace should be restored as follows:**

- (1) **Re-contour the Basin:** Excavate and contour the basin beyond the margins depicted in the IS/MND (see images below on page 9); the baseline, reference condition should be 2002 or earlier; although the contours of the “original” wetland could be ascertained and mapped with Lidar⁴ imaging, but it would probably be sufficient and more realistic to contour the basin so it has a maximum depth of ~3 feet below surrounding ground⁵;
- (2) **Bioswales:** Install bioswales on the north side of Auburn Boulevard and the west side of Bridge Road to capture stormwater run-off so it can be directed into the re-contoured basin;
- (3) **Perimeter Security:** Install large security boulders all along the margins of Auburn Boulevard and Bridge Road to prevent access to the site by off-road vehicles and to discourage illegal dumping.
- (4) **Broadcast Seed:** Broadcast and sow locally-collected seeds of native forbs, geophytes, and grasses plants (see recommended method below on page 7);
- (5) **Re-Oaking:** Create tree-lined streets along Auburn Boulevard and Bridge Road by directly planting locally-collected acorns on the perimeter of the parcel;
- (6) **Irrigation:** sprinkler irrigation for the seeded Terrace for the first 1-2 years after broadcasting to ensure seed germination and plant establishment; Irrigation can be discontinued during the wet season given sufficient rainfall;
- (7) **Weed Control:** and remove all occurrences of noxious weeds, e.g., yellow star-thistle (*Centaurea solstitialis*) for a minimum of 3 years after the Terrace has been re-contoured and seeded, and before the weeds set and disperse seeds.

TV-5
con't

⁴ Wetlands Restoration Part 1: Building a Duck Hole
<https://outdoor.wildlifeillinois.org/articles/wetland-restoration-part-1-building-a-duck-hole/>

⁵ Cross-sectional schematic adapted from Toronto and Region Conservation Authority
<https://trca.ca/conservation/restoration/meadows/>

Planting Palette for Restoring the Flora of Owl Creek Terrace

FORBS

Achillea millefolium (Common Yarrow) - [collect]: Longview Oaks Preserve
Amsinckia menziesii (Menzies' Fiddleneck) - [collect]: Longview Oaks Preserve
Plantago erecta (Dot-seed plantain) - [purchase]: Hedgerow Farms⁶
Symphotrichum chilense (California Aster) - [purchase]: Hedgerow Farms

GEOPHYTES

Chlorogalum pomeridianum (Soap Plant) - [collect]: Longview Oaks Preserve
Juncus xiphioides (Irisleaf Rush) - [collect]: Longview Oaks Preserve
Sisyrinchium bellum (Blue-eyed Grass) - [collect]: "Lincoln Highway Wetlands" in designated Natural Area between S.R.-51 and fairways #3 and #4 of the "Blue" Arcade Creek Golf Course (see map above on page 2 of these comments)
Triteleia laxa (Ithuriel's Spear) - [collect]: Longview Oaks Preserve

GRASSES

Elymus glaucus (Blue Wildrye) - [already purchased]: Hedgerow Farms
Festuca (Vulpia) microstachys (Pacific Fescue) - [already purchased]: Hedgerow Farms
Melica californica (California Melicgrass) - source [purchase]: Hedgerow Farms
Stipa (Nassella) pulchra (Purple Needlegrass) - [already purchased]: Hedgerow Farms

Broadcasting Seeds for the Restoration of California Grasslands⁷ [pages 12-13]
Broadcast seeding can require from 20 to 80% more seed than is needed for other seeding approaches...and tends to not spread seed uniformly across target areas. This lack of uniformity, however, can increase space between seed, reducing competition between individuals in the seed mixture. Ultimately, this dynamic can actually lead to higher rates of native seedling establishment than with drill seeding...If broadcast seeding is used, the soil should be disked approximately 1 to 2 inches deep prior to seeding to increase seed-soil contact and also to reduce the presence of small mammals...Once seed is spread, ensuring the adhesion of seed to the soil can be accomplished by imprinting, which can involve pulling an imprinter over seeded areas, moving animals through a seeded area, or putting cardboard sheets on top of the seed and stepping on them...Hydroseeding, which involves spraying a mixture of seed, mulch, and fertilizer in a water-based slurry to the soil surface, can also be used to prepare a seedbed...is subject to high failure rates in plant establishment, is often costly, and requires access to machinery. Hydroseeding can be improved by scarifying the soil surface and hydromulching...

⁶ <https://hedgerowfarms.com/local-ecotype/>

⁷ ANR Publication 8575 | Restoration Manual for Annual Grassland Systems in California | June 2017. <https://ucanr.edu/sites/BayAreaRangeland/files/267610.pdf>

Kettenring, K. M. , & Tarsa, E. E. (2020). Need to seed? Ecological, genetic, and evolutionary keys to seed-based wetland restoration. *Frontiers in Environmental Science*, 8(109), 1–30. <https://www.frontiersin.org/articles/10.3389/fenvs.2020.00109/full>

TV-5
con't

Proposed Project Characteristics

LANDSCAPING

[pages 11, 18]... The proposed project would remove approximately 21 existing trees throughout the site for various reasons, including poor health, structural defects, or location within the proposed development footprint. To mitigate the loss of the trees, the City would be required to plant 21 (at a ratio of 1:1) native trees that are adapted to the site's environmental conditions... consisting of 307 caliper inches. The City would be required to plant new trees that are native trees adapted to the site's environmental conditions... Using the criteria provided in the [Sacramento City Code 12.56.040]...

Figure 5: Proposed Landscaping Plan. Per City Code Section 17.612.040, portions of the reconfigured parking lot on the western portion of the project site would be subject to tree shading requirements. The total parking lot area would be approximately 27,581 square feet, and the required shade area would be approximately 13,790 square feet, totaling 50 percent.

[page 43] The Director of the Department of Parks and Recreation is ultimately responsible for deciding mitigations; however, the City Code requires the City to plant replacement trees at either a 1 tree to 1 tree ratio or an inch for inch ratio (City of Sacramento 2016). Therefore, the City will need to plant at least 21 replacement trees or a number of trees with a total DSH equal to the 21 trees removed in order to accommodate the project. Additionally, the City will need to obtain a permit in order to perform construction activities within the TPZ of 33 trees that will be subject to low to moderate impacts by the project.

[Appendix C; page 16] The 27 trees classified as having moderate construction impacts include the trees located immediately north and south of the existing ballfield, up to half of the TPZ on these trees could be impacted by the demolition of the existing ballfield facilities and the construction of the new facilities.

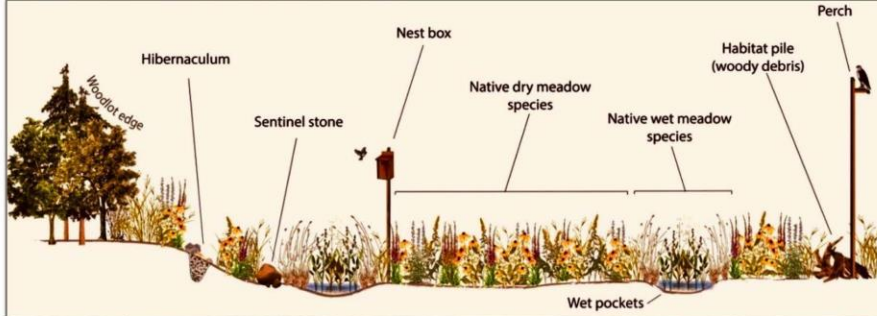
[page 38] **Sensitive Natural Communities.**...the project site contains approximately one acre of valley oak riparian woodland habitat along its northern and western edges bordering Arcade and Owl Creeks, respectively... Additionally, the project site contains 0.72 acre of valley oak woodland along its eastern edge. These natural communities are considered sensitive by the CDFW. However, the proposed project activities will avoid these sensitive habitats as they lie outside of the proposed development footprint.

[page 45] **BIO-3 Tree Protection Measures** In order to minimize and avoid damage to the trees identified for preservation, the City shall install/implement protective measures as described in Section 7.3 of the Arborist Report prepared for the project:

- **Protective Fencing:** Tree protection fencing shall be composed of 6-foot-tall chain-link fencing. The fencing should be supported by steel posts either driven into the ground or supported on weighted steel feet.
- **Signage:** Signs shall be installed along the outer circumference of the TPZ or along the boundary of approved construction that identify that the nearby tree(s) are identified as trees that shall be preserved and are protected by City Code Section 12.56. Signs shall clearly state the following information...

TV-6

HARRY RENFREE FIELD RENOVATIONS PROJECT
 AT DEL PASO REGIONAL PARK (PROJECT NO. L19-3000-02)
 INITIAL STUDY/MITIGATED NEGATIVE DECLARATION



TV-6
 con't

HARRY RENFREE FIELD RENOVATIONS PROJECT
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TV-6
con't

Renfree Renovations IS/MND

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Comments from Tim Vendlinski

[page 46] **Monitoring:** An ISA-certified arborist shall visit the project site periodically during construction to assess the status of the preserved trees and check on the tree protection measures that were implemented. If feasible, an arborist shall be present after the following construction-related events: installation of tree fencing, during excavation activities, grading activities, and during the installation of parking lots and driveways near project trees.

[page 117; Sheet No. LD102 of XX] "EXISTING AREA TO BE CLEARED AND GRUBBED FOR PLANTING."

[page 118; Sheet No. C-02 of XX] "CONSTRUCT GROUNDWATER RECHARGE FEATURE PER LANDSCAPE DETAILS" (element #9)

[page 380, 385] APPENDIX D Site Photographs.

[page 35 (468)] APPENDIX D Cultural Resources Technical Report

TV-6
cont

COMMENT:

The City Needs to Protect and Steward Wild Oaks in the Park:

Del Paso Regional Park is one of the last strongholds of oak woodlands in the Sacramento Metropolitan Area. However, no efforts have ever been made by local agencies, academic institutions, nor non-governmental organizations (NGOs) to manage the oak resources of the Park or the Arcade Creek watershed in a scientifically-rigorous and systematic way to ensure the survival of the unique assemblage of oak species; e.g., *Quercus douglasii*, *Q. lobata*, and *Q. wislizeni*. Wild oak populations are increasingly threatened with extirpation and extinction worldwide⁸, and yet there has been great complacency about the wild oak populations in Sacramento, and their presence and their future are taken for granted. Sixteen organizations have called upon the City to establish a Natural Areas Program⁹ so the City can properly protect and restore natural areas, and this would include the systematic stewardship of oak woodlands and prairies. Given the significant and disturbing loss of legacy oaks in the Park over the last 20 years, it is more crucial than ever to protect their progeny in the form of oak seedlings, saplings, and young mature oaks.

⁸ Beckman, E., Meyer, A., Denvir, A., Gill, D., Man, G., Pivorunas, D., Shaw, K., & Westwood, M. (2019). *Conservation Gap Analysis of Native U.S. Oaks*. Lisle, IL: The Morton Arboretum. https://mortonarb.org/app/uploads/2021/05/conservation-gap-analysis-of-native-US-oaks_sm.pdf

⁹ Campaign for Protecting Natural Areas in the City of Sacramento
Profiles of Nine at-risk Landscapes in City Parks
https://sacramento.granicus.com/MetaViewer.php?view_id=36&clip_id=5667&meta_id=746738

The ~50 wild oak seedlings and saplings at the northern boundary of the western parking lot were not accounted by DUDEK [page 423-440, APPENDIX F, Arborist Report, Attachment A] which means that there's actually ~160 trees within the project area. Approximately 40 individual saplings (less than 4 feet tall) of either *Q. douglasii* or *Q. lobata* (or their hybrids) are emerging as a new urban forest to replace the fallen legacy trees. Further, at least 12 more individual trees of the same type are growing in this zone at heights greater than 4 feet tall. The genetic character of these trees is unique, priceless, and irreplaceable, and yet the City has taken no measures to protect them from development, mowing, goat-grazing, nor string trimming. **There is no need to plant oaks in the Park from commercial nurseries and unknown provenance.** The City needs to rescue and steward the young, wild oaks before they are destroyed by intention or neglect.

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TV-6
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These young oaks are among the most important features of Del Paso Regional Park as natural oak recruitment is declining across most of California, and these particular specimens are almost certainly the progeny of the legacy oaks that were thriving in the area prior to the construction of Renfree Field in 1967, and then later succumbed to multiple anthropogenic stressors related to the construction and operation of the baseball field, e.g., ground disturbance and damage to root zones, soil erosion and compaction, lack of rainwater percolation through impervious surfaces and corresponding sheet runoff, installation of turf and excessive irrigation, and loss of soil moisture due to extreme drought and the urban heat island effect. The remains of one of these oaks pictured below just one month before it fell in 2013 can still be found at the northern boundary of the western parking lot, and another standing dead oak was enumerated by DUDEK as Tree #91.



Figure 19. 1971 aerial photograph showing Renfree Field soon after completion. Note the clubhouse building and clearly defined bleachers, dugout spaces, clubhouse and press box building, and restrooms; north is up. Source: UCSB 2023; Frame Finder, Flight CAS_3069, Frame 4-167.



Tree # 91 a dead Valley Oak along the

The City must protect this young grove of wild oaks during construction activities, i.e., the “Excavation and Utilities Plan” at **Figure 6** [page 14], and incorporate them into the formal landscaping plan for the Renfree Field Renovation project, i.e., “Proposed Landscaping Plan” at **Figure 5** [page 13]. Further, this zone must be **off limits** to any clearing and grubbing for planting as there is already a forest there.

If necessary, the northern boundary of the project area **should be shifted ~30 feet southward** to accommodate the conservation of the existing oak grove. **Figure 5** of the IS/MND shows six (6) trees at the northern boundary of the western parking lot where a healthy grove of young, native, and wild oaks is already thriving (see the two top images on page 15 below). Instead of planting new trees in this zone and disturbing the ground, a protection zone should be established around this grove, and the oaks should be carefully protected and stewarded as part of the Renfree Renovation Project.

This same type of protection should also be afforded to the older grove of wild oaks growing along the eastern perimeter of the Renovation zone, and it appears that the proposed renovation plan is designed to protect these trees. Here, Figure 5 depicts seven (7) large trees, and these trees in the plan should comprise the wild trees already growing there.

Mitigation requirements could be waived for removing coast live oaks (*Q. agrifolia*) as this species of oak should have never been planted in Del Paso Regional Park (notwithstanding the City’s tree shading requirements). These coast live oaks might be hybridizing with the Park’s wild population of interior live oaks (*Q. wislizeni*) and contaminating their gene pool via introgression. Further, non-native oaks, e.g., the popular red oak (*Q. rubra*) should be prohibited from the landscaping plan for the Renfree Renovation project due to potential adverse effects on wild oak populations.

The City should only plant locally-native oaks sourced from local, wild populations in the vicinity of Del Paso Regional Park; e.g., *Q. douglasii*, *Q. lobata*, and *Q. wislizeni*. If such trees are not available, then the City should be required to partner with a commercial or non-profit nursery and “contract grow” these trees¹⁰. This could be done now so the trees reach a desirable size for planting while the project is still in the planning and early implementation phases.

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¹⁰ If you’ve got time, a Contract Grow can guarantee plant availability + price certainty (Pacific Nurseries)
<https://pacificnurseries.com/if-youve-got-time-a-contract-grow-can-guarantee-plant-availability-price-certainty/>

Designate a Point of Contact for Construction Impacts:

The City should designate a senior official who can accept and respond promptly to reasonable complaints about potential construction impacts, including potential damage to wild oaks and protected City trees. Further, the ISA-certified arborist hired to monitor the project should be identified to the public and enabled to directly address reasonable public concerns. In 2018, the City did not designate a point of contact for the construction of the Measure U parking lot, and in the absence of any coherent supervision of the project, significant damage was done to native oak habitat and seasonal wetlands in the Park.



TV-6
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TV-6 con't



Photo D-3. View looking northeast from Bridge Road along trail north of Renfree Field.

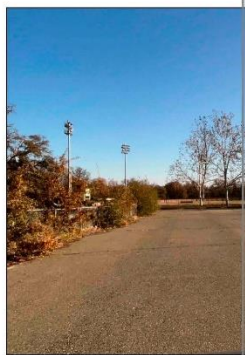


Photo D-13. View looking east at parking area north of Renfree Field.



Photo D-4. View looking southwest from northeast corner of BSA along trail north of Renfree Field.

Renfree Renovations IS/MND

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Comments from Tim Vendlinski

Biological Resources

Special-Status Wildlife Species

[pages 37-38, 42] As discussed in the BRE...only white-tailed kite (*Elanus leucurus*) and purple martin (*Progne subis*) were determined to likely have potential to occur on-site. [page 323] The many large oak trees in the BSA may provide potential nesting habitat for white-tailed kite; however, this species was not observed on-site during the field survey. Although marginally suitable foraging habitat may be present within adjacent areas of Del Paso Park, the remaining areas surrounding the BSA are largely urbanized developed and do not provide optimal foraging conditions for this species... The project site also contains suitable nesting trees for Swainson's hawk (*Buteo swainsoni*); however, this species was determined to be unlikely to occur... No special-status wildlife were observed during the December 7, 2022, habitat assessment... Several yellow-billed magpie (*Pica nuttallii*) nests were observed within the light poles and large oak trees surrounding the existing baseball field... Burrowing owls (*Athene cunicularia*) typically inhabit open, dry annual or perennial grasslands. Their habitat is dependent on burrowing mammals. Burrowing owls are unlikely to occur in the project area. While there is suitable grassland within the project area and adjacent areas, no suitable small mammal burrows were observed.

TV-7

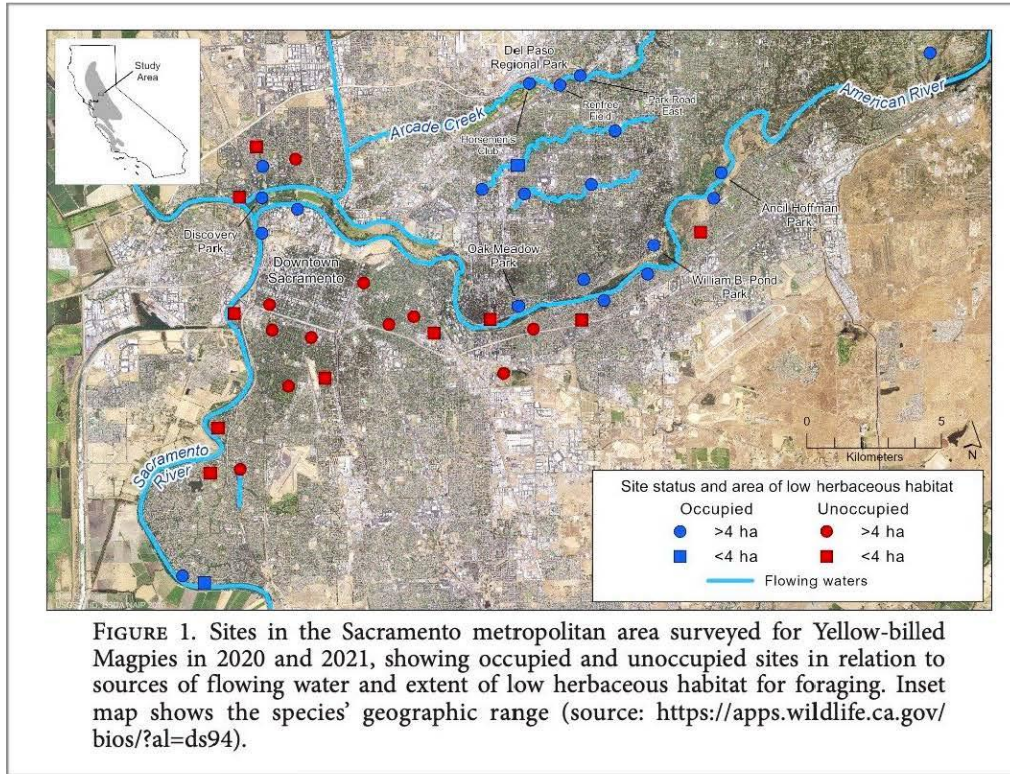
COMMENT:

The Renfree IS/MND should Incorporate the eBird Database

Established for the Park: The IS/MND for the Renfree Renovation Project should evaluate potential impacts of the project beyond the narrowly defined project site, and into a reasonable envelope of Del Paso Regional Park. The Sacramento Audubon Society (SAS) and their allies have established a eBird¹¹ database for the Park. This information has been previously conveyed to the City, and a skeletal version of the eBird database appears on pages 367-370 of APPENDIX C, but it doesn't seem like SWCA took advantage of this database when determining the presence/absence of rare and special status species. Also previously conveyed to the City was a published article¹² on the presence and status of yellow-billed magpies within and beyond the Park, and the conservation needs for this species (see image below). The IS/MND needs to describe precisely the measures that the City will take to protect the resident population of yellow-billed magpies during construction, and how the design of the renovated facility will be hospitable and safe for this endemic bird species.

¹¹ eBird database for Del Paso Regional Park
<https://ebird.org/barchart?r=L920553&yr=all&m=>

¹² Airola. 2021. Yellow-billed Magpie population status and habitat characteristics in urban Sacramento, California. *Western Birds* 52:222-239.
<https://westernfieldornithologists.org/publications/journal/journal-volume-52-3/v52-3-airola-yb-magpie/>



↑
TV-7
con't

To date, 117 species of resident and migratory birds have been documented to occur in the Park including special status species declared as “**Unlikely to occur**” in the IS/MND, i.e., Swainson’s hawk, tricolored blackbird, and white-tailed kite [APPENDIX E; Table E-2]. The Park also supports other increasingly rare species such as belted kingfisher, western bluebird, western meadowlark, and yellow-billed magpie.

In the late 1970s-early 1980s, the Park’s burrowing owl population was destroyed by rodenticides on land that would later be designated as the West Side Natural Area. Suitable habitat remains, and the bird could be reintroduced. In recent years, white-tailed kites could be observed relatively frequently west of the project site within the West Side Natural Area, but their preferred perch was removed by SMUD contractors in 2018.

[pages 37-38] **SUMMARY OF ANALYSIS UNDER THE 2035 GENERAL PLAN MASTER EIR AND APPLICABLE GENERAL PLAN POLICIES**

TV-8

COMMENT: YES; thank you for including this section and adhering to these policies!

[pages 46-53, 91] **(Tribal) Cultural Resources**

...an in-house records search of the California Historical Resources Information System (CHRIS) at the North Central Information Center (NCIC) located at California State University, Sacramento. The search included previous cultural resource studies and archaeological resources and historical resources within the project site and surrounding 0.25-mile area. Per the records search results (NCIC File No.: SAC-22-235), seven previously prepared cultural resource studies were identified within the 0.25-mile radius of the project site. Of these, none overlapped directly with the project site, but did provide beneficial supporting information and context for further research... The first resource identified was Del Paso Regional Park (P-34-004267), within which Renfree Field and the project area are entirely located. The resource was partially documented by Michael Brandman Associates on August 26, 2010, as part of the *Section 106 Cultural Resource Impact Analysis for the Del Paso Regional Park Redevelopment Project*... The project site is situated within the lands traditionally occupied by the Northern Sierra Miwok, Valley Nisenan, or Southern Maidu. Many descendants of Northern Sierra Miwok and Valley Nisenan throughout the larger Sacramento region belong to the UAIC, Shingle Springs, Lone Band, Colfax-Todds Valley, and Wilton Rancheria Tribes... SWCA was able to contact one representative, who stated that the project vicinity has heightened pre-contact sensitivities, stated that special consideration should be paid to areas where depth of disturbance exceeds 3 feet below grade, and identified an MLD.

TV-9A

COMMENT: This was a welcome and detailed treatment of cultural resources at the project site and within the Park. However, no mention was made about the archeological site (6,000-8,000 years old) that was reportedly discovered by a CSUS Masters Degree candidate during the 1977-1978. Artifacts were found in the dry stream channel and in the vicinity of Bridge Road. I think I have at least an abstract of that thesis in my personal archives.

The depth and boundaries of the site registered as CA-Sac-201 have not been precisely characterized, but it is possible that the site underlays Bridge Road near the crossing at Arcade Creek, and portions of the Renfree Field parking lot to the east, and Owl Creek Terrace to the west. In 2012, ICF prepared an environmental study for the Roseville Road Bridge Replacement Project¹³, and made the following finding about the archeological site:

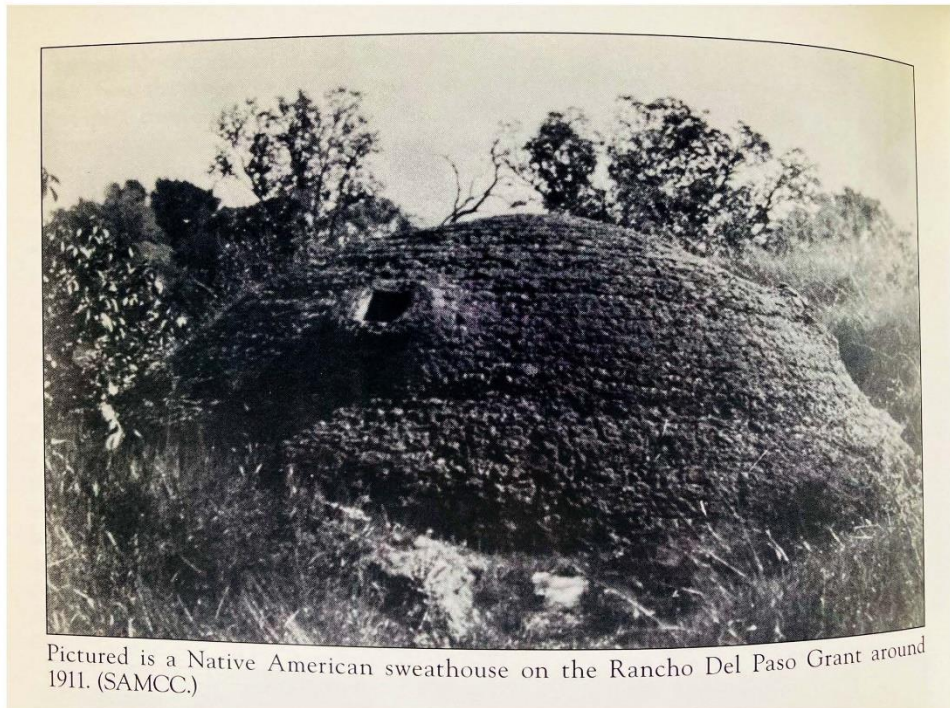
TV-9B

¹³ ICF March 2012; Page 35 (109 of 159); Initial Study/Mitigated Negative Declaration; Roseville Road Bridge Replacement Project (T15068500)

“(A) previously recorded prehistoric archaeological site, CA-Sac-201, was identified within 1 mile of the project site and is directly relevant for assessing the sensitivity of the project site. Geomorphological data in the area of Sac-201 suggest that there is moderate potential for buried archaeological deposits to be present in the project vicinity, for two reasons. First, CA-Sac-201 and the project site share the same soil type. Second, CA-Sac-201 is buried under 9 feet of alluvium, which is within the proposed depth of construction for the creek realignment.”

TV-9B
con't

The IS/MND for the Renfree Renovation Project should address the registered site known as CA-Sac-201, and the City should consider adding a cultural resources element to the proposed project to commemorate the presence of the ancient civilizations along Arcade Creek and the continued presence of indigenous people who were displaced by European settlement across Rancho del Paso less than 200 years ago.



Water and Water Quality

[page 71, 101] Arcade Creek receives stormwater from surrounding developed areas and garden and lawn irrigation runoff. Water from these sources can contain urban contaminants, such as fuels, herbicides and pesticides... Sustainable design and maintenance features to be included with the proposed park renovation include required elements such as adherence to the City's Model Water Efficient Landscape Ordinance (MWELO) and inclusion of LID strategies to infiltrate stormwater and reduce run-off and "River Friendly Landscaping" program practices.

TV-10

COMMENT: A bioswale should be installed on the perimeter of the project area to capture, filter, and infiltrate "nuisance flows" of potentially contaminated irrigation water applied to the playfields. Element #9 depicted on page 118 "CONSTRUCT GROUNDWATER RECHARGE FEATURE PER LANDSCAPE DETAILS" is a worthy idea, but the this feature needs to be precisely designed to avoid adverse impacts to the grove of wild oaks growing in that area (see comments above on page 3 and pages 11-14).

In 1985, a bioswale was not installed along the perimeter of the Sacramento Softball Complex, and consequently, excess irrigation water flows away from the playfields, down an embankment, and into a set of storm drains. This excess irrigation water continues to encourage the growth of dense, non-native, and noxious vegetation that clutter and degrade the West Side Natural Area.

Transportation and Circulation

[pages 87-88] Both Park Road and Bridge Road in the immediate vicinity of the project site are two-lane local streets that serve the neighborhood... Gaps exist in the sidewalks along the north side of Auburn Boulevard, or the southern project frontage. There are no sidewalks along Bridge Road... The park improvements and changes to the western parking lot would not alter vehicle circulation or site access, i.e., via Auburn Boulevard and Bridge Road. Among the proposed park improvements... would be improvements to the Bridge Street frontage, including a new sidewalk along a portion of Auburn Boulevard... The project proposes construction of 75 linear feet of a new 5-foot-wide sidewalk along the northern side of Auburn Boulevard (project's southern frontage). The proposed project would include a total of 77 surface parking spaces, reducing the on-site parking total by approximately 50 spaces. The existing 21-space parking lot on the east side of the project site would remain. The overall parking breakdown would be: 28 standard spaces, two ADA spaces, and a drop-off area in the northwestern corner between the courts and parking lot.

TV-11

COMMENT: Sidewalk improvements along Bridge Road and on the northern side of Auburn Boulevard should be depicted in Figure 4. Renfree Field Improvements at DeI Paso Park at page 10 of the IS/MND for the Renfree Renovation Project.

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Response to Letter from Tim Vendlinski

Comment No.	Response
TV-1	<p>The comment requests a revision to the IS/MND to identify the Natural Habitat Areas.</p> <p>The IS/MND has been updated to reflect these revisions. New text has been added to the errata below under <i>Section II – Project Description</i> to describe the areas mapped as Natural Habitat Areas.</p> <p>This comment is noted and has been provided to City decision-makers for consideration.</p>
TV-2	<p>The comment requests the City to restore the connectivity of the park and trail system, noting safety issues with homeless encampments.</p> <p>This comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
TV-3	<p>The comment notes a reference error to Arden Creek. The comment also notes the stormwater infrastructure design and requests the City to investigate different stormwater retention strategies and locations that will help to revitalize the riparian area of Owl Creek, which is a tributary to Arcade Creek, and to demarcate Oak Conservation Zones.</p> <p>The IS/MND has been updated to reflect these revisions. The reference to Arden Creek has been revised in the errata below under <i>Section II – Project Description</i>.</p> <p>This comment regarding stormwater does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
TV-4	<p>The comment expresses concern regarding potential lighting impacts on wildlife and the opportunity to incorporate “Dark Sky” design concepts into the ultimate lighting plan citing the lost opportunity at the Softball Complex with Del Paso Regional Park.</p> <p>Under Biological Resources Checklist Questions A and B (pp. 21–22) of the Public Review Draft IS/MND, SWCA concluded that the lighting of the recreation facility could have potential impacts on wildlife and ecosystems within the natural areas adjacent to Renfree Field. The newly installed lighting posts would be affixed with energy-efficient LED light fixtures and would be designed to eliminate disruptive glare to nearby homes and reduce light pollution to the night sky, in accordance with General Plan Policy ER 7.1.3. The lighting for the field and court lights would be on a timer and scheduled by recreation staff to shut off at 10:00pm.</p> <p>The IS/MND has been updated to reflect this project component.</p>

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Comment No.	Response
TV-5	<p>The comment notes a need for a comprehensive restoration plan for Owl Creek Terrace, expresses concern regarding the Biological Resources Evaluation, and requests additional maintenance to tree roots.</p> <p>A search of the National Wetlands Inventory indicated that there were no wetlands in the Biological Survey Area (see Appendix B of the Biological Resources Evaluation, included as Appendix C to the IS/MND). To be considered a wetland, the area in question must meet all three parameters: vegetation, hydrology and soil in accordance with U.S. Army Corps of Engineers (USACE) guidelines, which the Owl Creek Terrace currently does not. The BSA does not contain any wetlands or waters that could potentially be considered jurisdictional by the USACE, Regional Water Quality Control Board (RWQCB) or California Department of Fish and Wildlife (CDFW). Since this area does not contain any sensitive biological resources or habitats, under CEQA, the project is only responsible for restoring the impacted area to its former state prior to construction of the project (the existing conditions). The planned hydroseeding would enhance the quality of this disturbed habitat. The City has confirmed they would use a native seed mix for reseeded.</p> <p>Text revisions have been included in the errata below, in response to comment SAS-3, above, under <i>Section II – Project Description</i>. This comment is noted and has been provided to City decision-makers for consideration.</p>
TV-6	<p>The comment expresses concern regarding the adequacy of the arborist report (included as Appendix F of the Biological Resources Evaluation in Appendix C of the IS/MND), notes oak tree preservation, and requests a point of contact for construction impacts.</p> <p>The arborist report accounted for 63 wild oak seedlings and saplings along the northern boundary of the western parking lot. Data for trees greater than or equal to 4 inches in Diameter at Standard Height (DSH) was provided in Attachments B and D of the arborist report. Because the seedlings and saplings were less than 4 inches, they were not shown in Table C-1 in Attachment C. The young trees in this area would not be removed. Preservation measures for the young trees in this area and the planting of replacement trees for those that are removed in accordance with the City’s tree planting requirements were recommended in the arborist report. A recommendation was included in the arborist report that all replacement trees consist of native tree species, including native oaks and western redbud (<i>Cercis occidentalis</i>). As stated in Biological Resources Checklist Question C (pp. 43–44) of the Public Review Draft IS/MND, Mitigation Measures BIO-2 and BIO-3 recommend obtaining a Tree Permit and implementing tree protection measures considered adequate under CEQA to ensure a less-than-significant impact. Construction notices would include a point of contact. These notices would be posted in various places along the site perimeter during construction.</p> <p>No changes to the IS/MND are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>

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Comment No.	Response
TV-7	<p>The comment expresses concern regarding online databases and desktop review specific to birds and wildlife.</p> <p>As part of project review, SWCA consulted several online resources, including eBird, to determine which bird species have potential to nest and/or forage on-site. Per the conclusions outlined in the Biological Resources Evaluation (Appendix C) section 6.2 Nesting Birds (pp. 12) of the Public Review Draft IS/MND, the database analysis did not consider species that may only incidentally occur on-site. The database results determined that many of the special-status species listed do not have potential to occur on-site due to the lack suitable habitat, human disturbance, etc. Mitigation measures have been incorporated to avoid impacts to the yellow-billed magpie population as well as other nesting birds.</p> <p>Text revisions have been included for Mitigation Measure BIO-1 for nesting bird protections in the errata below, in response to comment SAS-1, above, under <i>Section III – Environmental Checklist and Discussion, Biological Resources</i>. No additional changes to the IS/MND are required in response to this comment.</p>
TV-8	<p>The comment notes support for general plan concurrence.</p> <p>The comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MMD are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
TV-9A	<p>The comment notes that the Cultural Resources section of the Public Review Draft IS/MND does not include a discussion of a potential archaeological site “that was reportedly discovered by a CSUS Master’s Degree candidate during the 1977-1978 [sic]” where artifacts were found within a dry creek bed near Bridge Road.</p> <p>It is noted that the California Historical Resource Information System (CHRIS) records search request filed with the North Central Information Center (NCIC), which was submitted as part of the preparation of the Cultural Resources Technical Report, did not include this study as part of the records search results. While the referenced study may have been helpful as part of the literature review conducted in support of the cultural resources investigations, the ultimate findings account for the heightened archaeological sensitivity of the area, due in part to the proximity to Arcade Creek and similar discoveries in the area, as well as the positive Sacred Lands File (SLF) search results from the California Native American Heritage Commission (NAHC). This heightened sensitivity for archaeological and tribal cultural resources (TCRs) was taken into consideration during the development of the mitigation measures for both resource types as outlined in the Public Review Draft IS/MND, which takes into account the potential for unknown archaeological resources to be extant within the project area and ultimately reduces the impact to a less-than-significant level. That said, we encourage the commenter to share the abstract of the referenced thesis within their personal archives with the City so that it can be used to help inform the execution of the mitigation measures outlined under Mitigation Measures CUL-1 and CUL-2 (p. 52).</p>

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	<p>It is also possible that the commenter is also erroneously referring to the Clifford G. Curtice thesis, which was prepared in 1961 and outlines discoveries made within the dry Arcade Creek bed of several artifacts during the 1940s, which appears to correspond with the CA-SAC-000201 (CA-SAC-201) site, of which some of the information was included in the NCIC records search. In this instance, CA-SAC-201 is discussed in greater detail in the errata below under <i>Section III – Environmental Checklist and Discussion, Cultural Resources</i>. This comment is noted and has been provided to City decision-makers for consideration.</p>
TV-9B	<p>The comment notes that the specific archaeological site within the vicinity of the project area, referred to as CA-SAC-000201, was not precisely described and states that the addition of a “...cultural resources element to the proposed project to commemorate the presence of the ancient civilizations along Arcade Creek...” be prepared.</p> <p>Regarding the characterization of the archaeological site referred to by the commenter as CA-SAC-201—also referred to as CA-SAC-000201, P-34-0002228, and more colloquially as the “Arcade Creek Site”—the specific location of the site has been a topic of debate and discussion since the 1940s, and several efforts to identify a more specific location have occurred over the years. The commenter is correct in that the IS/MND does not provide specific information about the location and depth of the site, which was partially intentional to maintain a degree of confidentiality, while also reflecting the ambiguity of the site’s location. According to the original 1955 documentation included in the records search results from the NCIC, the original site was identified 100 yards west of the bridge at Bridge Road and at a depth of 9 feet, as indicated in the quotation from the 2012 ICF report provided by the commenter. This, coupled with the subsequent investigation into the whereabouts of the CA-SAC-201 site closer to the project area that found no evidence of the site, led the authors of the Cultural Resources section of the Public Review Draft IS/MND to acknowledge that while the site was not explicitly located within the boundaries of the project area, the likelihood of potential archaeological resources is high. Additionally, through other investigations and consultation with tribal representatives, the depth of sensitivity identified for the project includes ground disturbing activities of three feet or greater throughout the ballpark area and previously disturbed areas and six inches in the area immediately north of Renfree Field. Both of these depths where archaeological and tribal monitoring is required under MM CUL-2 and MM TCR-2, would account for any potential below ground resources that are either unknown or associated with CA-SAC-201, would exceed the cited nine feet below the surface that could be associated with CA-SAC-201. Therefore, the cultural and tribal resource mitigation measures, as outlined in the Public Review Draft IS/MND (CUL-1 through CUL-4 and TCR-1 through TCR-4), will reduce potential impacts to a less-than-significant level for both resource types. However, to address the concerns of the commenter, the Cultural Resources section (p. 48) of the Public Review Draft IS/MND has been corrected to reflect a more appropriate characterization of CA-SAC-201, and further edits to reflect the sensitivity and the overall depth of the significant materials has also been factored into Mitigation Measures CUL-1 and CUL-2 (p. 52) and Mitigation Measure TCR-2 (p. 95).</p>

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	<p>As for the preparation of a cultural resources element related to the pre-contact history of the Arcade Creek area, a potential interpretive component was not identified or developed through consultation with tribal representatives. As such, a cultural resources element or interpretive component as a potential mitigation measure for TCRs was not pursued. That said, the commenter is correct to identify the benefit that this tool may have on promoting the awareness and understanding of cultural resources within the Arcade Creek area. To reflect this, Mitigation Measure CUL-3 (pp. 52–53) has been updated with appropriate language to include the potential for interpretive elements as a future element of the unanticipated discovery protocols, although this should be subject to further consultation with Native American tribal representatives, which did not originally request interpretive materials as part of the official consultation with the City.</p> <p>Text revisions have been included in the errata below under <i>Section III – Environmental Checklist and Discussion, Cultural Resources and Tribal Cultural Resources</i>. This comment is noted and has been provided to City decision-makers for consideration.</p>
TV-10	<p>The comment notes that a bioswale should be installed around the perimeter of the project to limit runoff. The comment notes that a swale was not installed in 1985.</p> <p>The design of the proposed project provides for containment of all runoff water associated with the site through the use of on-site stormwater detention basin(s); therefore, discharge of runoff to surface waters or groundwater would not result from the proposed project. The project would comply with SWPPP requirements. As noted in the comment and stated in the Proposed Project Characteristics under Utilities (p. 12) and the Utilities and Service Systems section (p. 101) of the Public Review Draft IS/MND, the project would be required to implement elements such as adherence to the City’s Model Water Efficient Landscape Ordinance (MWELO) and inclusion of LID strategies to infiltrate stormwater and reduce run-off and “River Friendly Landscaping” program practices. As stated in the Proposed Project Characteristics under Utilities (p. 12) of the Public Review Draft IS/MND, stormwater runoff from impervious surfaces on the project site such as the western parking lot would be directed to a new bioswale to be located near the site’s southern border at the park entry, away from Arcade Creek.</p> <p>The comment does not raise any issues related to the adequacy of the CEQA analysis, and no changes to the IS/MMD are required in response to this comment. This comment is noted and has been provided to City decision-makers for consideration.</p>
TV-11	<p>The comment notes that sidewalk improvements along Auburn Boulevard are proposed as part of the project. The comment requests that Figure 4, Proposed Site Plan is updated to depict these improvements.</p> <p>The IS/MND has been updated to reflect this project component. Figure revisions have been included in the errata below under <i>Section II – Project Description</i>. This comment is noted and has been provided to City decision-makers for consideration.</p>

SECTION 3 – REVISIONS TO THE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Overview

This document presents, in ~~strikethrough~~ and double-underline format, the revisions to the Public Review Draft IS/MND for the Harry Renfree Field Renovations Project. The revisions to the Public Review Draft IS/MND do not affect the adequacy of the environmental analysis or conclusions in the Public Review Draft IS/MND. The changes presented below would not result in any new significant impacts or an increase in impact significance from what was identified in the Public Review Draft IS/MND, and recirculation is not required (State CEQA Guidelines Section 15073.5).

Based on the comments received on the Public Review Draft IS/MND prepared for the proposed project (released for public review on September 6, 2023), as well as staff-initiated changes and errata, the following revisions have been made to the Public Review Draft IS/MND.

Section II – Project Description

In response to the Tim Vendlinski letter, comment TV-1, the following text has been added to the “Surrounding Land Uses” discussion (p. 4):

Surrounding Land Uses

The 630-acre Del Paso Regional Park includes three golf courses, called the Haggin Oaks Golf Complex; lighted ball fields; and other recreational features, including picnic areas, a sand volleyball court, a play structure and area, restrooms, and the Sacramento Softball Complex. The Sacramento Horsemen’s Association is also located within the park boundaries, and the park trails are used by equestrians. Substantial portions of the park are designated Natural Habitat Areas,¹ ~~generally along the Arcade Creek riparian buffer zone and east of Renfree Field, mapped as the following:~~

- Del Paso Regional Park (East Side) Natural Habitat Area, situated east of Watt Avenue, which includes portions of Arcade Creek running east to west from the Auburn Boulevard Bridge at Winding Way westward past Bridge Road to the Watt Avenue/I-80 Interchange;
- Del Paso Regional Park (West Side) Natural Habitat Area, situated west of Watt Avenue, which includes portions of Arcade Creek Natural Area, running east to west from the Watt Avenue/I-80 Interchange westward to the northbound on-ramp structures for the North Sacramento Beltline Freeway contiguous with fairways #16, 17, and 18 on the Haggin Oaks Golf Complex.
- Unmapped Natural Habitat Area, wrapping around the Softball Complex and connecting to the “Lincoln Highway Wetlands” and Natural Area (situated parallel with SR-51 [Cap City Freeway]); and

- Longview Oaks Natural Habitat Area, situated west of the Capitol City Recycling Inc. and north of Longview Drive.

NEW footnote:

¹ City of Sacramento. 2009. Del Paso Regional Park. Available at: https://www.cityofsacramento.org/-/media/Corporate/Files/ParksandRec/Parks/DelPasoRegional/DelPasoReg_NatHabAreas.pdf?la=en. Accessed November 8, 2023.

In response to the Tim Vendlinski letter, comment TV-3, the following text has been revised in the third paragraph of the “Existing Conditions” discussion (p. 6):

Existing Conditions

Adjacent to the project site on the north, east, and west are ~~Arden~~ Arcade Creek and areas mostly composed of natural oak woodlands and open space.

In response to the Tim Vendlinski letter, comment TV-11, Figure 4 has been revised to show the proposed sidewalk improvements (see Legend #8 in yellow):

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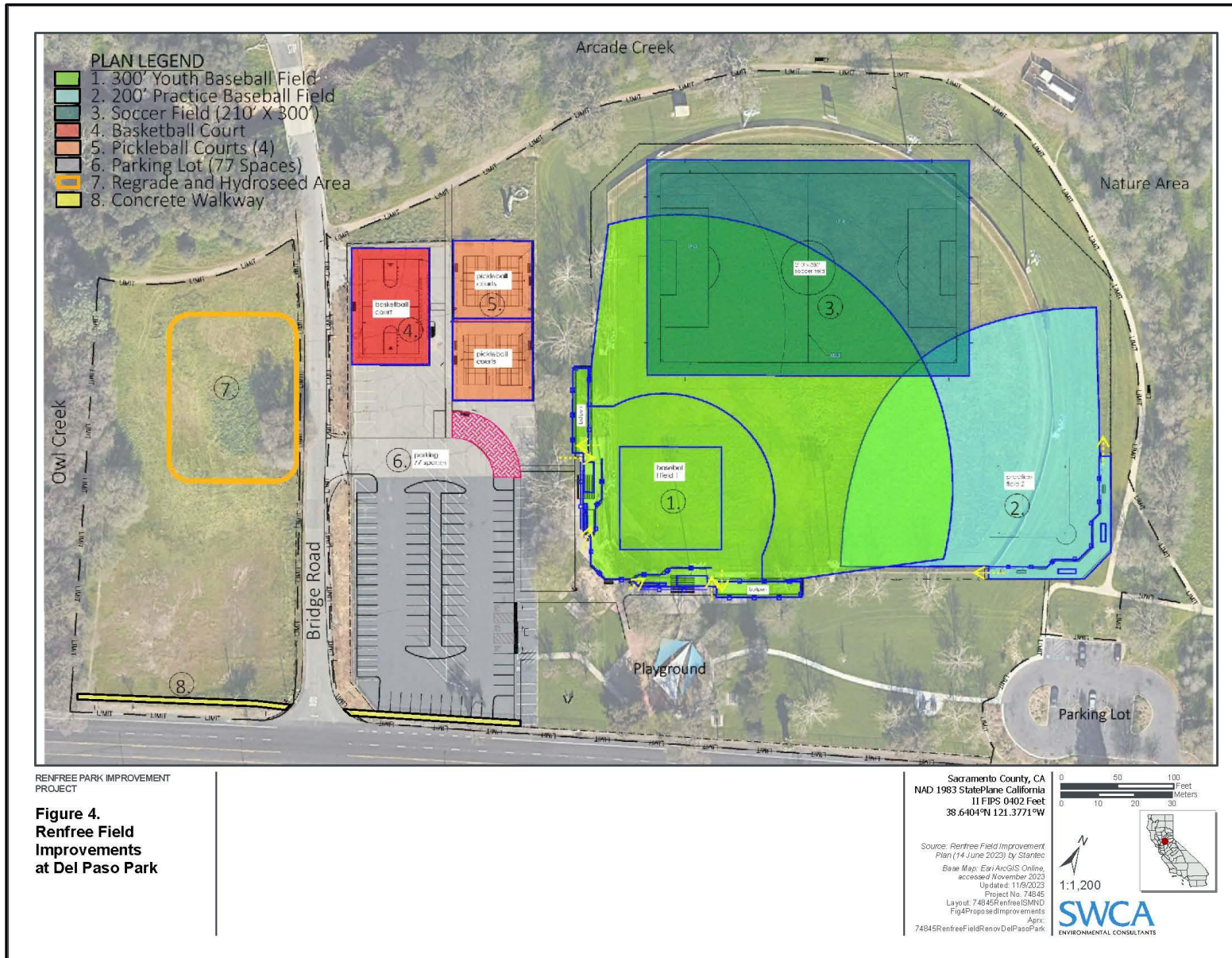


Figure 4: Proposed Site Plan.

In response to the Sacramento Audubon Letter, comment SAS-4, the following text has been added to the first paragraph of the “Utilities” discussion (p. 12):

Proposed Project Characteristics

The Sacramento Municipal Utility District (SMUD) is the utility provider for electricity. The project site is in Ward 7 of the SMUD service area. Approximately nine new light posts would be installed in the western parking lot. The project would include installation of field lighting that would consist of approximately eight 60-foot-tall light poles around the proposed baseball fields and soccer fields. Additional light poles would be installed throughout the parking lot. After completion of construction, there would be 17 light posts/towers on the project site. See Figure 6: Proposed Excavation Plan. The poles would be affixed with energy-efficient LED light fixtures that would be designed to eliminate disruptive glare to nearby homes and reduce light pollution to the night sky. The lighting for the field and court lights would be on a timer and scheduled by recreation staff to shut off at 10:00pm. The proposed project would connect to the electrical lines located along Auburn Boulevard adjacent to the children’s playground.

In response to the Sacramento Audubon letter, comment SAS-5, the following text has been added to the “Project Operations” discussion (p. 15):

PROJECT OPERATIONS

While Renfree Field is currently not in use, the children’s playground would remain open during construction. Upon completion of construction, the operational hours for the sports courts, ball fields, and soccer field at Renfree Field would be 6:00 a.m. to 10:00 p.m., typical for recreational facilities. Although the proposed project would reduce the amount of available parking at the site, it would increase park use due to the introduction of new, additional park features. Maintenance of the improvements would be part of regular, ongoing maintenance for Del Paso Regional Park and conducted in accordance with the parks maintenance program (see 09-AC-DelPasoParkACNAMandM.pdf (cityofsacramento.org)). The City has confirmed that maintenance and pest management would not include use of rodenticides or insecticides.

In response to the Sacramento Audubon Letter, comment SAS-3, the following text has been added to the first paragraph of the “Project Construction” discussion (p. 15):

PROJECT CONSTRUCTION

Project construction activities include demolition of the existing park infrastructure associated with Renfree Field, including light towers and fences. Approximately 35,882 square feet of asphalt and aggregate would be removed in the northwestern portion of the western parking lot. Construction activities in the western area of the project site across Bridge Road (Owl Creek Terrace) would include grading and hydroseeding. The City has confirmed that commercially available recommended native seed mix for Owl Terrace would be used (Appendix A). Site grading and balancing (including Owl Creek Terrace grading) would occur throughout the site for the development of the new facilities. The proposed project would include sidewalk construction along the north side of

Auburn Boulevard from Bridge Road to the edge of the Owl Creek Terrace area and the extension of new utilities for electricity, domestic and irrigation water services, storm drainage, and bioswale development and landscaping.

Section III – Environmental Checklist and Discussion

BIOLOGICAL RESOURCES

Several letters noted edits to the Biological Resources section of the Public Review Draft IS/MND. In response to the Sacramento Audubon Society Letter, comment SAS-1, Mitigation Measure BIO-1 (p. 44) has been clarified to ensure lighting pole removal would not occur during yellow-billed magpie nesting season:

BIO-1 Birds Protected by the MBTA or the California Fish and Game Code

If construction is to begin during the nesting season (February 1–August 31), then a preconstruction survey for protecting nesting birds shall be conducted by a qualified biologist. If a 15-day lapse in construction work occurs during the nesting season, then another preconstruction survey shall be conducted prior to the continuation of work. Results of the preconstruction surveys shall then be submitted to the City Planning Division for review.

The preconstruction survey shall be conducted within 15 days prior to the start of construction. The survey shall cover the project site and areas within 500 feet for birds of prey, and within 100 feet for other bird nests. Private and inaccessible areas shall be surveyed from accessible public areas with binoculars. If no active nests of a bird of prey, MBTA-protected bird, or other CDFW-protected bird are found, then no further avoidance and minimization measures are required. If active nests are found, they shall be avoided and protected as follows:

- If a bird of prey nest is found, a 250-foot-radius Environmentally Sensitive Area (ESA) shall be established around the nest.
- If an active nest of another (non-bird of prey) bird is found, a 50-foot-radius ESA shall be established around the nest.
- Light pole removal shall occur during the non-breeding season of the yellow-billed magpie (July 1–January 1).

Construction activity shall not be allowed in an ESA until the biologist determines that either: 1) the nest is no longer active; 2) monitoring determines a small ESA buffer shall protect the active nest; or 3) monitoring determines that no disturbance to the nest is occurring. Construction buffers may be reduced in size or removed entirely if the qualified biologist determines that construction activities shall not disturb nesting activities or contribute to nest abandonment.

CULTURAL RESOURCES

The only comments pertaining to the Cultural Resources section of the Public Review Draft

IS/MND were provided in the Tim Vendlinski letter, comments TV-9A and TV-9B. In response to comment TV-9B, several additions have been made throughout this section to clarify the known conditions of an archaeological site known as CA-SAC-000201.

The “Background Research” discussion of the Cultural Resources section has been updated in response to these comments. The last sentence of the first paragraph on page 48 has been revised to include the following clarification:

The second resource identified within the vicinity of the project was a pre-contact site (P-34-0002228, also referred to as CA-SAC-000201), which was found outside the project site in the 1940s and first documented in 1955; documentation illustrates that attempts to revisit the site were conducted in 2001, but the site could not be relocated. According to the documentation, the site is believed to have been discovered west of the Bridge Road bridge within the bed of Arcade Creek. It was documented at a depth of 9 feet below the existing surface but was comprised of scattered artifacts that may have been deposited from other locations along Arcade Creek. Overall, the exact location of CA-SAC-000201 is unknown but is believed to be within the vicinity of the project area.

Under Cultural Resources Checklist Questions B and C (Archaeology and Paleontology) (pp. 50–51), the first and third paragraphs have been revised as follows:

Additional research included the NCIC records search and a review of the SLF by the NAHC, revealed that a previously recorded archaeological site (CA-SAC-000201) was found within the Arcade Creek area and that significant tribal resources are located within the vicinity of the project site. Collectively, this suggests that the project site and its vicinity have a “high sensitivity” for archaeological resources as defined under CEQA.

First, all contractor staff shall be trained with regards to general identification of cultural resources, which will include specific information related to the sensitivities of the project area and the potential CA-SAC-000201 site, in addition to sensitivity related to tribal resources, and all relevant inadvertent discovery protocols.

Under Mitigation Measure CUL-1 (p. 52), the text has been revised as follows:

...The program shall include relevant information regarding sensitive tribal and cultural resources, including appropriate details of CA-SAC-000201, in addition to applicable regulations, protocols for avoidance, and consequences of violating state laws and regulations.

Under Mitigation Measure CUL-2 (p. 52), the text has been revised as follows:

...These areas of sensitivity are identified site wide as areas where the depth of excavation exceeds 3 feet, as well as any ground-disturbing activities exceeding 6 inches in areas located north of the current Renfree Field outfield, located towards Arcade Creek. Specific to the potential presence of cultural materials associated with site CA-SAC-000201, which was previously documented in the project vicinity at a depth of 9 feet below the surface, hand augering by the archaeological and/or Native American monitor shall occur at the finalized locations where disturbance shall exceed 8 feet below grade, which will

correspond with potential light and fence post footings, prior to construction to identify any potential cultural materials. In the event that cultural materials are identified during monitoring, the qualified monitor and construction crew shall adhere to all relevant unanticipated discovery protocols.

Under Mitigation Measure CUL-3 (p.52–53), the text has been revised as follows:

...Construction monitoring shall continue throughout the duration of all ground-disturbing activities. In the event that cultural materials are uncovered and data recovery efforts are completed, the City, in consultation with Native American tribal representatives, may consider the development of appropriate interpretive materials to include at the project site.

TRIBAL CULTURAL RESOURCES

Similar to the Cultural Resources section of the Public Review Draft IS/MND, the only comments pertaining to the Tribal Cultural Resources section were provided in the Tim Vendlinski letter, comments 9A and 9B. Select clarifications and edits were made throughout the Tribal Cultural Resources section to address the concerns outlined in these comments.

In the second paragraph on page 92, the following revision was made:

As outlined above under the Cultural Resources section, qualified SWCA archaeologists conducted a records search to confirm previously recorded sites of archaeological nature within the project area. While no previous sites within the project area were identified, previously recorded archaeological sites, specifically CA-SAC-000201, were noted within a 0.25-mile radius, particularly along the Arcade Creek watershed...

Under Mitigation Measure TCR-2 (p. 95), the first paragraph was revised to state the following:

...Generally, monitoring would be required where the depth of disturbance exceeds three feet below grade; however, activities within the northern boundary beyond the current Renfree Field outfield that exceed a depth of disturbance of 6 inches below grade would also trigger tribal monitoring. At the finalized select locations where excavation depths exceed 8 feet for light and fence post footings, hand augering prior to construction should be completed by the qualified archaeologist and in close consultation with the Native American monitor to identify any cultural or tribal cultural materials at these particularly sensitive depths.