

1-22-1985

**FINAL
ENVIRONMENTAL IMPACT REPORT**

**DEL PASO REGIONAL PARK MASTER PLAN
IMPLEMENTATION PROGRAM**

Prepared by:

**City of Sacramento
Department of Parks and Community Services**

Technical assistance from:

Jones & Stokes Associates Inc.

**SCH# 84091704
JANUARY 1985**



CITY OF SACRAMENTO

DEPARTMENT OF PARKS AND COMMUNITY SERVICES

3520 FIFTH AVENUE SACRAMENTO, CALIFORNIA 95817
TELEPHONE (916) 449-5200

ROBERT P. THOMAS
DIRECTOR

G. ERLING LINGGI
ASSISTANT DIRECTOR

CROCKER ART MUSEUM DIVISION
GOLF DIVISION
METROPOLITAN ARTS DIVISION
MUSEUM AND HISTORY DIVISION
RECREATION DIVISION
PARKS DIVISION
ZOO DIVISION

January 2, 1985

Interested Persons

SUBJECT: Final EIR for the Del Paso Regional Park Master Plan Implementation Program

The Department of Parks and Community Services is forwarding this document for a seven-day review period to persons who commented on the Draft EIR as indicated on the enclosed Final EIR distribution list. Commentators should determine if the responses sufficiently address their comments.

The Final EIR consists of an addendum containing comments on the Draft EIR and responses by the City to these comments. Copies of commentators' letters are included in Section 6 of this addendum. Comments and responses are grouped by topic as found in the Draft EIR.

Comments on the Final EIR and/or on the merits of the project should be received by the Parks and Community Services Department no later than January 9, 1985 to be considered by staff.

The Planning and Community Development Committee will consider the Final EIR and the Community Plan at their meeting on January 16, 1985, starting at 3:00 p.m. in the Council Chambers of City Hall, 915 I Street, Sacramento, California. The City Council will consider the Final EIR and Community Plan at their meeting on January 22, 1985, starting at 7:30 p.m. in the same location as previously mentioned.

A copy of this document has been forwarded for public review to the following libraries: Carmichael, Central (downtown), Del Paso, Martin Luther King, North Sacramento, Hagginwood, and to the CSUS Science/Tech Library. In addition, a copy may be reviewed or obtained at the Department of Parks and Community Services, 3520 Fifth Avenue, Sacramento, California.

If you have any questions regarding this Final EIR, please contact Barbara E. Bonebrake at (916) 449-5375.

ROBERT P. THOMAS, Director
Parks and Community Services

RPT:js

Enclosure

FINAL EIR

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City of Sacramento

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Sacramento, CA 95814

Mel Johnson
Department of Public Works
City of Sacramento

The Library-Science/Tech
Attn: E. Heaser
California State University
2000 Jed Smith Drive
Sacramento, CA 95819

Sacramento County
Recreation & Parks Dept.
Attn: Walt Ueda
3701 Branch Center Road
Sacramento, CA 95827

James Bloodgood
Traffic Engineer
City of Sacramento

The Sacramento Bee
City Desk
P.O. Box 15779
Sacramento, CA 95813

Sacramento County
Environmental Health Agency
3701 Branch Center Road
Sacramento, CA 95827

Officer J. A. Barclay
Police Department
City of Sacramento

The Sacramento Union
City Desk
301 Capitol Mall
Sacramento, CA 95812

Sacramento County
Water Resources Division
827 7th St., Rm. 301
Sacramento, CA 95814

Chief William Powell
Fire Department
City of Sacramento

Harry Behrens
Water and Sewer Division
City of Sacramento

Sacramento County
Department of Airports
Attn: Larry Kozub
6968 Airport Boulevard
Sacramento, CA 95837

Marty Van Duyn, Director
Planning Division
City of Sacramento

James P. Jackson
City Attorney
City of Sacramento

Sacramento County
Dept. of Public Works
Attn: G. Flanery/R. Nelson
9600 Ecology Lane
Sacramento, CA 95827

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Federal Aviation Admin.
Airport District Office
Burlingame, CA 94010

Federal Aviation Admin.
McClellan Rapcon
5839 22nd Street
Rio Linda, CA 95673

Calif. Dept. of Transportation
Aeronautics, Attn: Chief
Planning & Programming
1120 N Street
Sacramento, CA 95814

Regional Transit
Attn: Richard Mendes
P.O. Box 2110
Sacramento, CA 95810

SMUD
Paul Olmstead
P.O. Box 15830
Sacramento, CA 95813

Environmental Council of Sac.
Attn: Steven Gates
909 12th Street
Sacramento, CA 95814

Native American Heritage
Commission
Attn: John Smith
1400 10th St., Rm. 200
Sacramento, CA 95814

Del Paso Heights NDP/PAC
Attn: Evelyn Dooley
1142 Grand Avenue
Sacramento, CA 95838

Air Pollution Control Dist.
Attn: Gary Glissmeyer
9323 Tech Center Dr., #800
Sacramento, CA 95828

Environmental Branch Chief
Dept. of Transportation
Attn: Brian Smith
P.O. Box 911
Marysville, CA 95901

Office of Planning & Research
Clearinghouse, Room 121
1400 Tenth Street
Sacramento, CA 95814

Calif. Department of Boating
and Waterways
Attn: Barbara Kierbow
1629 S Street
Sacramento, CA 95814

Calif. Native Plant Society
c/o Betty Matyas
3501 Pageant Drive
Sacramento, CA 95826

Capitol Bicycle Commission
Attn: Pete Baldrige
4231 Moss Drive
Sacramento, CA 95822

Sierra Club Conserv. Com.
Sacto. Valley-Sierra Group
P.O. Box 1335
Sacramento, CA 95806

Exploration Logging, Inc.
Attn: Larry Patterson
P.O. Box 214676
Sacramento, CA 95821

Blue Ribbon Stables
Attn: Colette N. Garrison
4252 Mason Lane
Sacramento, CA 95821

Calif. Dept. of Parks
and Recreation
Attn: Francis A. Riddell
Cultural Resources Section
P.O. Box 2340
Sacramento, CA 95811
Sacto. Science Center
Center & Jr. Museum
Attn: Kay Antunez
3615 Auburn Blvd.
Sacramento, CA 95821

Ray Tretheway
520 Garden Highway
Sacramento, CA 95833

FHWA Dist. Engineer
Attn: Bruce E. Cannon
P.O. Box 1915
Sacramento, CA 95814

Sacto. Horsemen's Assn.
5200 Longview Drive
North Highlands, CA 95660
Attn: John M. Jones

Sacto. Audubon Society
c/o Douglas G. Shaw
2610 Notre Dame Drive
Sacramento, CA 95826

Greater Sacramento
Softball Association
Attn: Ron Radigonda
4623 T Street
Sacramento, CA 95819

Sacto. Horsemen's Assn.
c/o Doris C. Larch
4440 Reycraft Blvd.
Sacramento, CA 95841

Nancy Lindsay
704 Central Avenue
San Francisco, CA 94117

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Sacramento Area Council
of Governments
Attn: Gary B. Keill
800 H St., Ste. 300
Sacramento, CA 95814

Arcade Creek Restoration
Project
Attn: Steven N. Talley, Ph.D.
4347 Stollwood Drive
Carmichael, CA 95608

Bob Wahlgren
282-2nd ABG/DEEX
McClellan AFB, CA 95652

Calif. Dept. of Fish & Game
Attn: Ken Fellows
1416 Ninth Street
Sacramento, CA 95814

Sacramento Audubon Society
Attn: Alta Tura
4633 Q Street
Sacramento, CA 95819

Golden Sr's. Softball Club
Attn: Deni Treaster
3421 David Way
Sacramento, CA 95820

James M. Trumbly
3140-17th Street
Sacramento, CA 95818

Greater Sacramento Softball
Association
Attn: William Gubel
4623 T Street
Sacramento, CA 95819

Arcade Creek Restoration
Project
Attn: Timothy Vendlinski
704 Central Avenue
San Francisco, CA 94117

Bob Oppegard
801 Morse Avenue
Sacramento, CA 95825

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Section 1

PURPOSE AND FORMAT OF THE FINAL EIR

Under California Environmental Quality Act (CEQA) Guidelines, the City of Sacramento is required, after completion of a Draft Environmental Impact Report (DEIR), to consult with and obtain comments from public agencies having jurisdiction by law over aspects of the proposed project, and to provide the general public with opportunities to comment on the DEIR. The City is also required to respond to significant environmental points raised in the review and consultation process. This Final EIR (FEIR) has been prepared to respond to the public agency and general public comments received on the Del Paso Regional Park Master Plan Implementation Program EIR.

This document has been prepared in the form of an attachment or addendum to the DEIR as allowed by Section 15146(b) of the CEQA Guidelines. This document, together with the DEIR, herein incorporated by reference, constitutes the FEIR.

During the public review period several people asked that the FEIR include a completely revised DEIR. The City does not feel that such an approach is required or desirable. However, since many persons reviewing the DEIR made similar comments about certain key aspects of the report, Section 2 of this FEIR has been added, which includes several new maps as well as clarifying information about key aspects of the DEIR.

The FEIR includes the following sections:

- o Revisions to key aspects of the DEIR based on responses to comments.
- o City (the lead agency) responses to significant environmental points raised in the DEIR review process.
- o Copies of all written comments received on the DEIR and a summary of public testimony received at the DEIR public hearing.
- o An errata section presenting corrections to information in the DEIR.

City responses to comments on the DEIR have been separated into subject areas to correspond to those contained in the DEIR. Under each subject heading, every comment has been repeated

verbatim from the commentor's letter. Only typographical errors have been corrected. Similar responses are occasionally cross-referenced to other responses to avoid duplication.

Section 2

KEY REVISIONS

This section of the FEIR contains revised information about key aspects of the DEIR.

Project Description

Project Maps

The DEIR included three maps showing sports complex and access road alternatives. These maps presented conceptual locations of the facilities for purposes of comparison and were not intended to represent the exact location of facilities. During the public review period City staff developed more detailed maps of the alternatives. These revised maps show each alternative at the same scale using a recent topographic map as the base. They are attached as revised Exhibits B-3, B-4, and B-5.

Base Maps

In addition to the concerns about the maps of the alternatives, several commentors expressed concern that the DEIR lacked a detailed base map showing the park without the proposed improvements. In response to these concerns, the City has prepared three additional maps. One is a location map without any proposed improvements (Exhibit 2-1). That map also identifies the two areas for which detailed topographic maps have been prepared. The environmental constraints in the sports complex area are identified on the first topographic map (Exhibit 2-2). The second topographic map is also an environmental constraint map and shows the key environmental features of the park east of Renfree Field (Exhibit 2-3).

Map of East Side Improvements

In response to numerous comments, a map showing the location of the improvements on the east side of the park (day-use area and neighborhood park, etc.) is included in this document (Exhibit 2-4).

EXHIBIT B-3. SPORTS COMPLEX ALTERNATIVE 1 (REVISED)

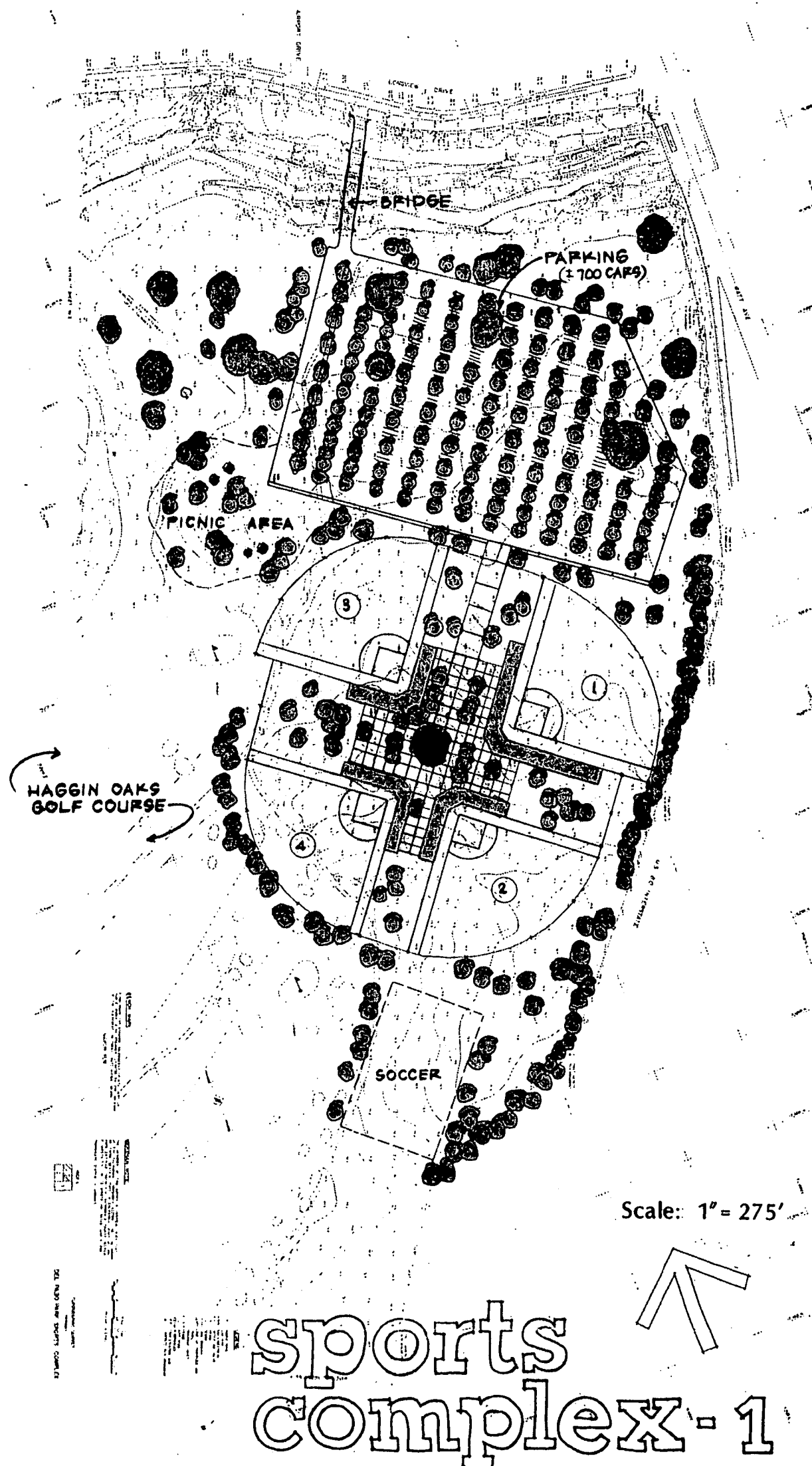


EXHIBIT B-4. SPORTS COMPLEX ALTERNATIVE 2 (REVISED)

sports complex-2

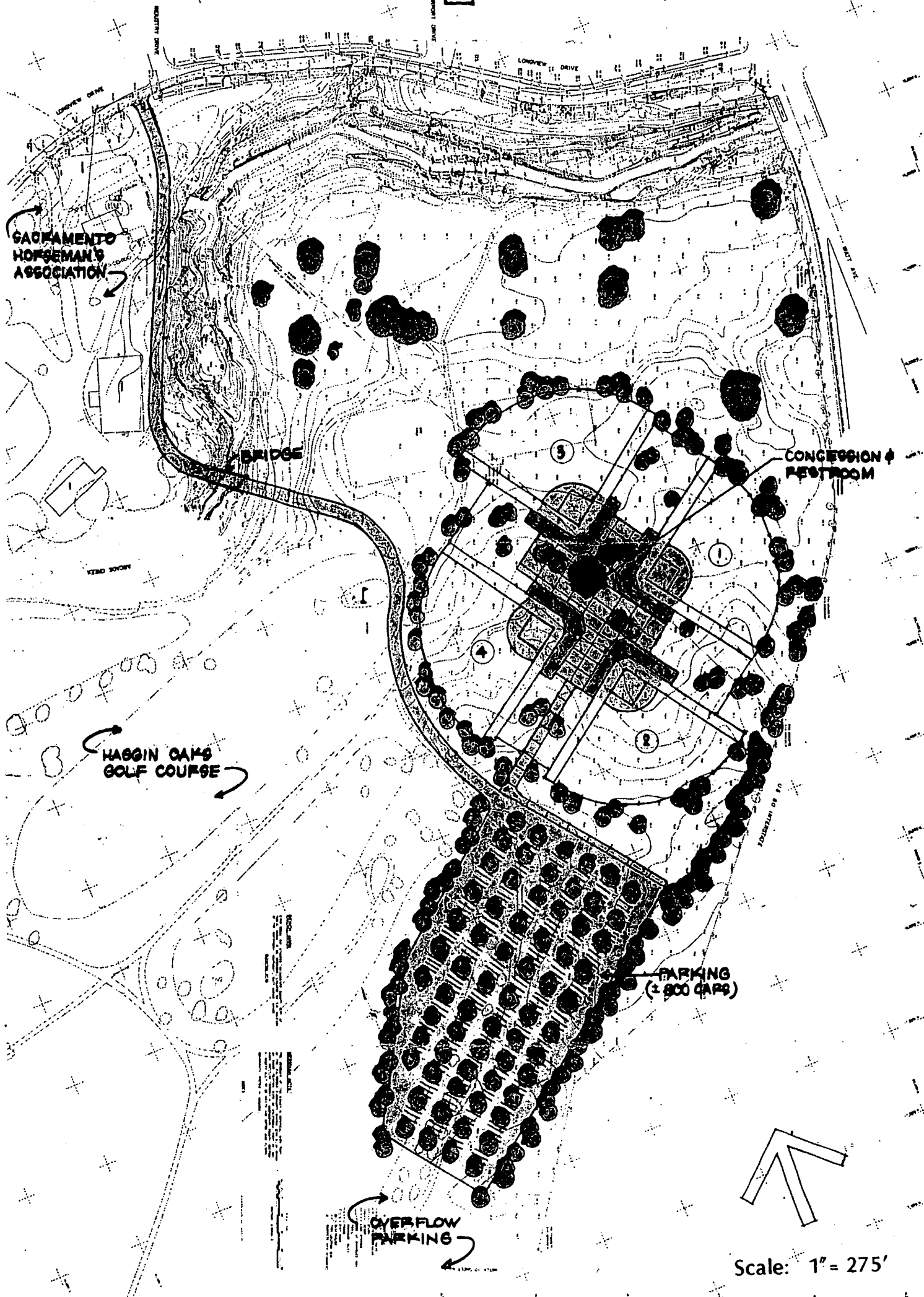
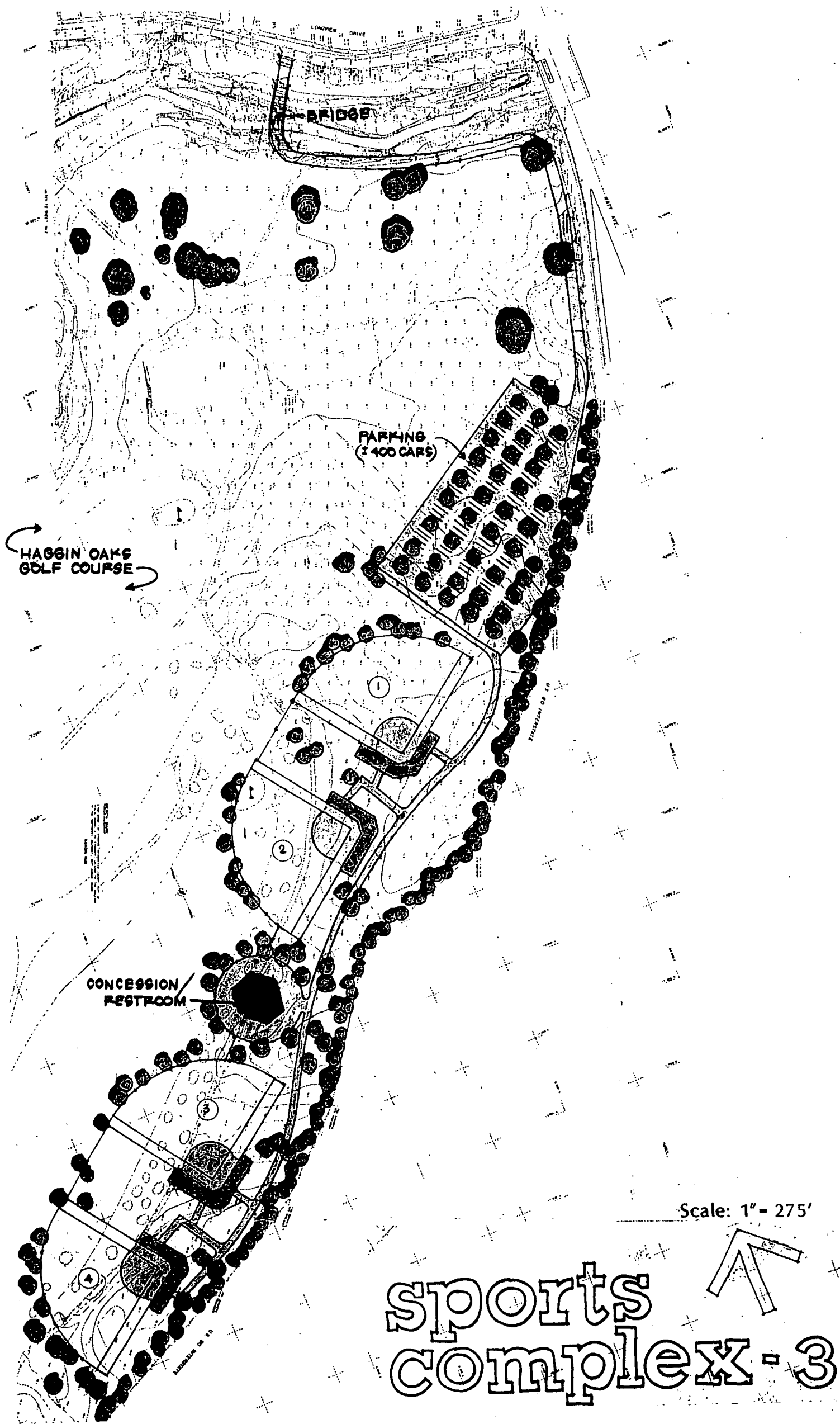


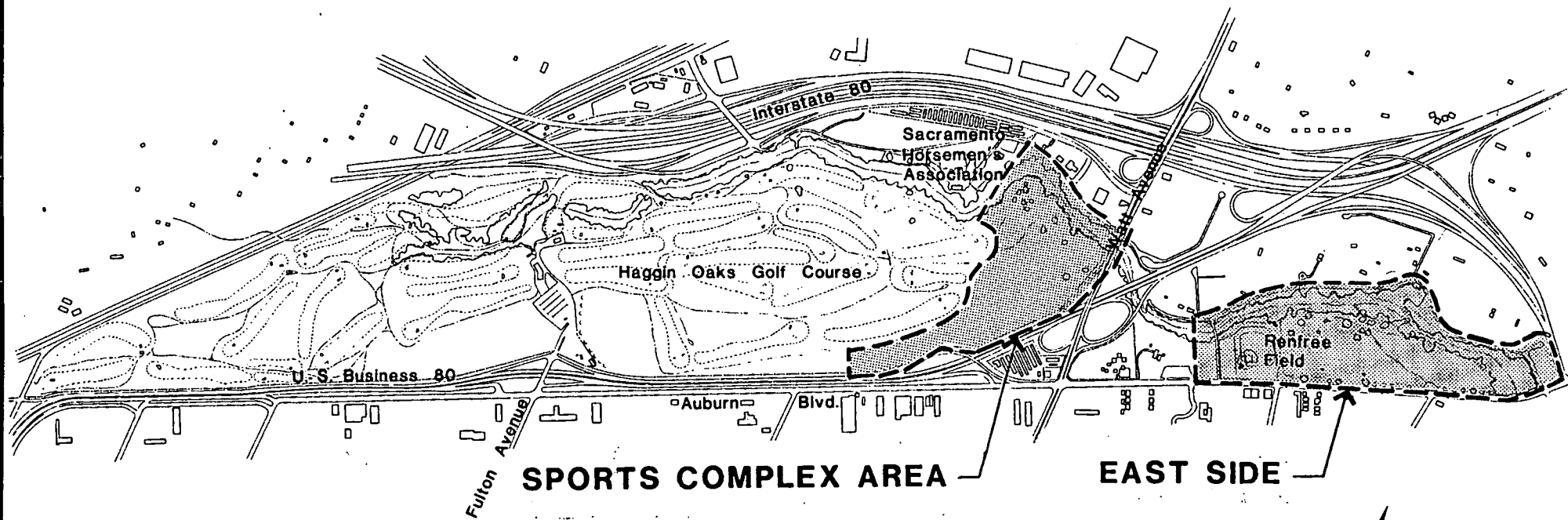
EXHIBIT B-5. SPORTS COMPLEX ALTERNATIVE 3 (REVISED)



CITY OF SACRAMENTO
DEPARTMENT OF COMMUNITY SERVICES



EXHIBIT 2-1. LOCATION MAP



LOCATION MAP

REVISIONS		DATE BY
NO.	DESCRIPTION	

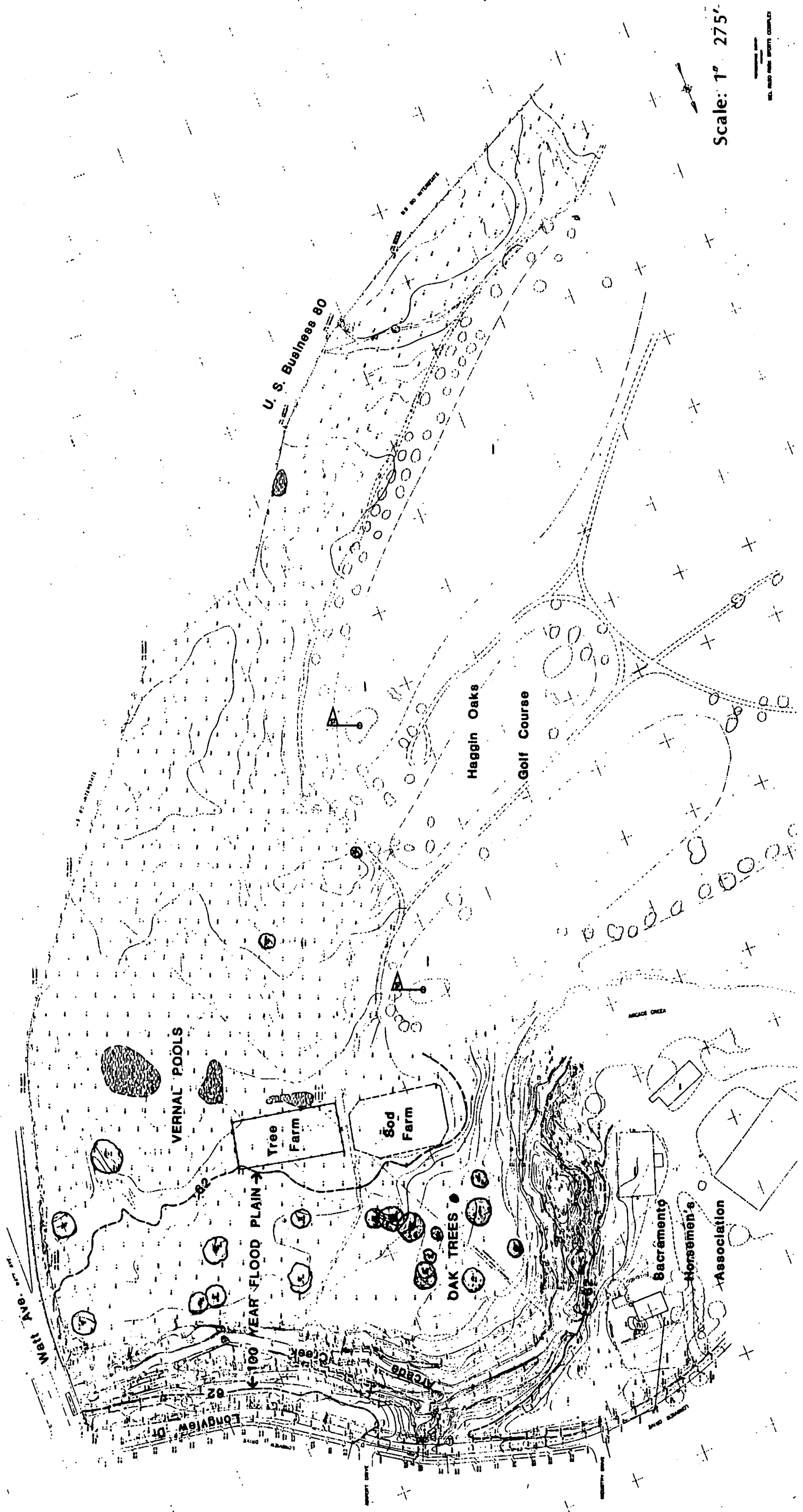
DRAWN BY _____
 DESIGNED BY _____
 LANDSCAPE ARCHITECT
 DATE _____
 FIELD BOOK _____ SCALE _____

CITY OF SACRAMENTO
 DEPARTMENT OF COMMUNITY SERVICES



DEL PASO PARK

1/6 SHEET

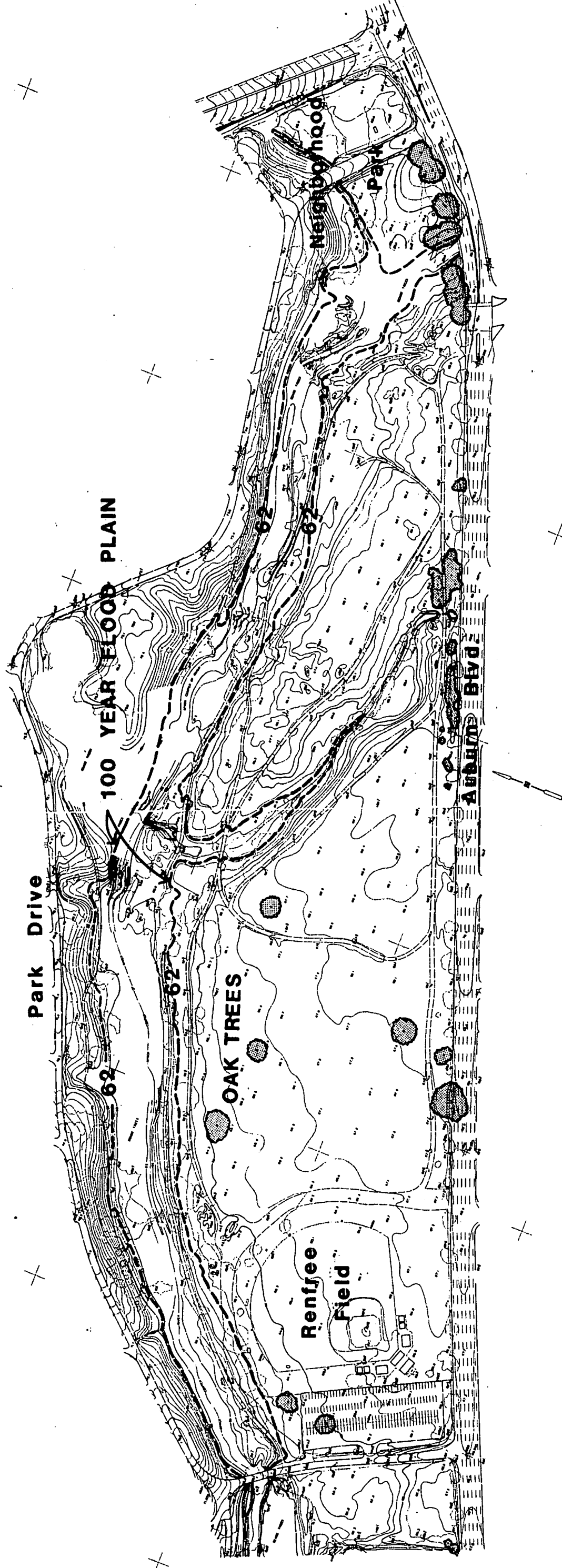


Scale: 1" = 275'

NO. 100 YEAR FLOOD PLAIN

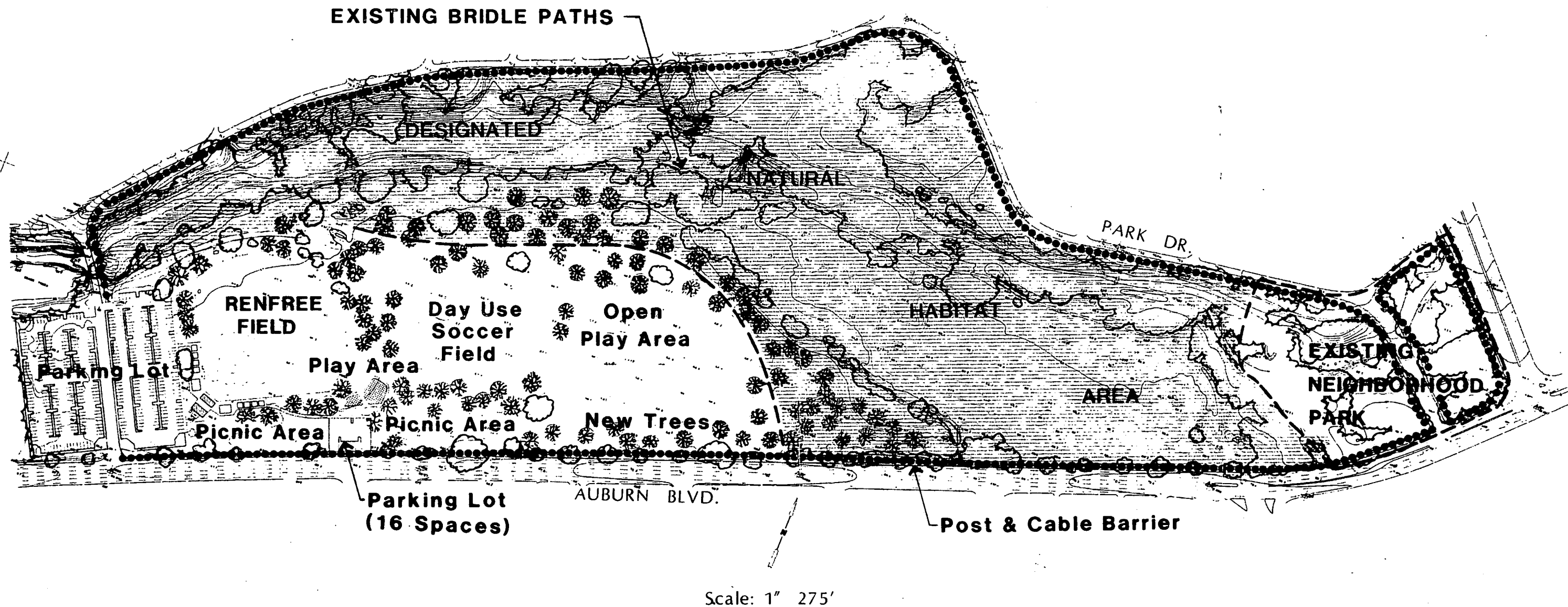
EXHIBIT 2-2. ENVIRONMENTAL CONSTRAINTS (WEST AREA)

EXHIBIT 2-3. ENVIRONMENTAL CONSTRAINTS



DEL PASO PARK - EAST SIDE

EXHIBIT 2-4. PROPOSED IMPROVEMENTS



DEL PASO PARK - EAST SIDE MASTER PLAN

CITY OF SACRAMENTO
DEPARTMENT OF COMMUNITY SERVICES



Access Road A/Parking Lot

Location. In the DEIR, Access Road A and Sports Complex 1 were shown on the same map (Exhibit B-3). In the Summary Table and in the body of the report, Access Road A was considered to have less impact than the other access roads due to its short length. This assessment did not include the impact that Access Road A would have if it were coupled with the parking lots shown in sports complex alternative 2 or 3.

During the public review period numerous commentors have objected to the location of the parking lot shown in Sports Complex 1. It became apparent during the public review period that the report also should have included a description of Access Road A with the parking lot located south of the sports complex, as it is in Exhibits B-4 and B-5. Under such a scenario the access road would extend south, through the middle of the oak savanna area, and connect with a parking lot south of the sports complex.

Impacts. With the parking lot moved to the south of the sports complex, Access Road A would be considerably longer than indicated in the DEIR. Such a road alignment could traverse the oak savanna, potentially impacting the oak regeneration area. This intrusion into this natural area may encourage intensive human activity throughout the oak savanna, resulting in additional damage to regenerating oaks.

The alignment for the extension of Access Road A has not been finalized, but there are options directing the alignment to the south and east that would be a compromise between bisecting the terrace and paralleling the creek. Paralleling Arcade Creek would, as discussed in the DEIR (pages 67 and 68), impact wildlife in the riparian corridor. In the tradeoff between crossing the forage area of the terrace or paralleling the creek, crossing the terrace is potentially less damaging to wildlife.

By traversing the oak savanna, the aesthetic value of the large open expanse in the middle of an urban environment would be diminished.

Maintenance costs of the road would be greater than indicated in the DEIR due to its greater length.

Cumulative Impacts

The comments on the DEIR identify three types of cumulative impacts. They are:

- o Cumulative impacts of maximum utilization within the park itself
- o Cumulative impacts on the park from new development around the park and in adjacent areas

- o Cumulative loss of significant oak regeneration areas and vernal pools in the Sacramento region"

Each of these cumulative impacts deserves individual discussion.

Cumulative Impacts from Maximum Utilization Within Park

Impacts. Although the DEIR described the impacts of each of the components of the Master Plan, it did not include a discussion of the impacts of overall development. The overall development would result in the introduction of additional people and traffic into the park. Although some park usage can be predicted based on Park Department permits (i.e., softball games), attempting to predict a "worst case" level of utilization is highly speculative for several reasons. First, the day-use area and neighborhood park are intended to encourage individual users, rather than organized groups with no limitation on how many persons may show up on a given day. Second, the psychology of park users would suggest that some potential users would be deterred from using the park if they perceived it to be "too crowded" on a given day. Finally, lack of adequate parking may deter some potential visitors from using the park.

Despite these unquantifiable variables the following analysis attempts to estimate "worst case" utilization. The following table shows the estimated numbers of persons that could use the park on a given day based on existing use data and projections of sports complex use (these numbers would vary by day of the week and time of year).

Maximum Utilization of Del Paso Regional Park

<u>ACTIVITY</u>	<u>ESTIMATED DAILY USERS</u>	
	<u>WEEKDAY</u>	<u>WEEKEND</u> (tournaments)
Sports Complex ¹	600-700	700-1,000
Renfree Field ²	100-150	200-300
Horsemen's Association ²		
Clubhouse	50	250
Horse Shows	-	150-200
Riders	20-30	50-75
Day-use Area ⁴	20-30	50-100
Neighborhood Park ⁴	20-50	100-200
Hikers and Bird Watchers ⁴	20-50	50-100
Science Center/Junior Museum ³	0-300	50-500
Total Daily Users	830-1,330	1,600-2,725

¹ Kelly pers. comm.

² Jones pers. comm.

³ Anderson pers. comm.

⁴ Jones & Stokes Associates

As shown in the table, on an average weekday between 830 and 1,330 persons may use the park. These numbers could go as high as 1,600 to 2,725 on a weekend.

The cumulative impacts of maximum utilization (worst case use) of the park fall into three primary areas:

- o Conflicts among competing users
- o Effects on vegetation and wildlife
- o Increased traffic

The problems resulting in each of these areas may be particularly serious at peak-use times, such as weekends, when major tournaments and organized events are occurring simultaneously.

Conflicts Among Competing Users

Maximum utilization of the park may result in conflicts that would include, but are not limited to, the following:

- o Ballplayers and spectators destroying natural habitat areas
- o Persons using the day-use area or neighborhood parks destroying natural habitat areas
- o Noise from sports tournaments disturbing the tranquility of the park for hikers and naturalists, as well as wildlife
- o Vandalism and trespassing on surrounding private property and on the Horsemen's Association facility
- o Increased vandalism of park property in general
- o Conflicts between horseback riders and persons not familiar with horses

Effects on Vegetation and Wildlife

Maximum utilization may potentially bring hundreds of persons to the park on a given day. These additional people, many of whom would likely be unfamiliar or insensitive to the natural habitat values in the park, may damage the park's natural resources. For example, such damage could include:

- o Trampling vegetation (particularly in sensitive areas such as vernal pools)
- o Destroying riparian vegetation
- o Increased littering (particularly a problem when nonbiodegradable litter is nonbiodegradable and thrown into natural areas that are difficult to maintain)
- o Scaring animals
- o Trampling or intentionally breaking oak seedlings and young trees
- o Damaging mature trees by breaking limbs, carving on bark, etc.

Increased Traffic

With excessive numbers of people using the park at the same time, traffic problems within the park may develop. There may be

an increase in accidents, particularly in the area near the Horsemen's Association where traffic from horse shows may interface with sports tournament traffic. Congestion on Longview Drive near the new access road may occur. In addition, overflow parking in unauthorized areas may be a problem.

Mitigation. The impacts of maximum utilization of the park may be mitigated by several measures:

Better Coordination of Major Events by Department of Parks and Community Services. At the current time the Department operates a permit program for baseball, softball, and other organized sports. However, for many events no permits are necessary. The Department could increase the number and types of uses requiring permits to minimize conflicting peaks. For example, by requiring coordination for horse shows and other large group events in Del Paso Regional Park the Department could avoid scheduling events coincident with major softball tournaments.

Limit Parking to Designated Areas. This can be accomplished by a combination of the following measures:

- o Provide parking only in designated areas.
- o Installing post and cable or other types of fences to restrict parking to designated areas and to eliminate the use of Longview Drive, open space areas, and the Horsemen's Association for parking
- o Using signs to restrict parking
- o Rigorously enforcing violation of posted parking regulations

Cumulative Impacts from Surrounding Development

These impacts were described in Section O of the DEIR.

Cumulative Loss of Oak Regeneration Areas and Vernal Pools on a Regional Basis

Both oak woodland/savannas and vernal pools are diminishing habitat types in Sacramento County and in the Great Valley of California. The estimates of the losses of vernal pool habitat for Sacramento County were given in the Vegetation section of the DEIR. The project area degraded vernal pools cover approximately 0.003 of 1 percent of the remaining low terrace vernal pool habitat in Sacramento County. No cumulative inventory of oak regeneration areas is known for Sacramento County. Oak regeneration has been more successful in riparian zones than in upland oak savannas. The oak regeneration in the uplands of the park is unusual (Knudsen pers. comm.).

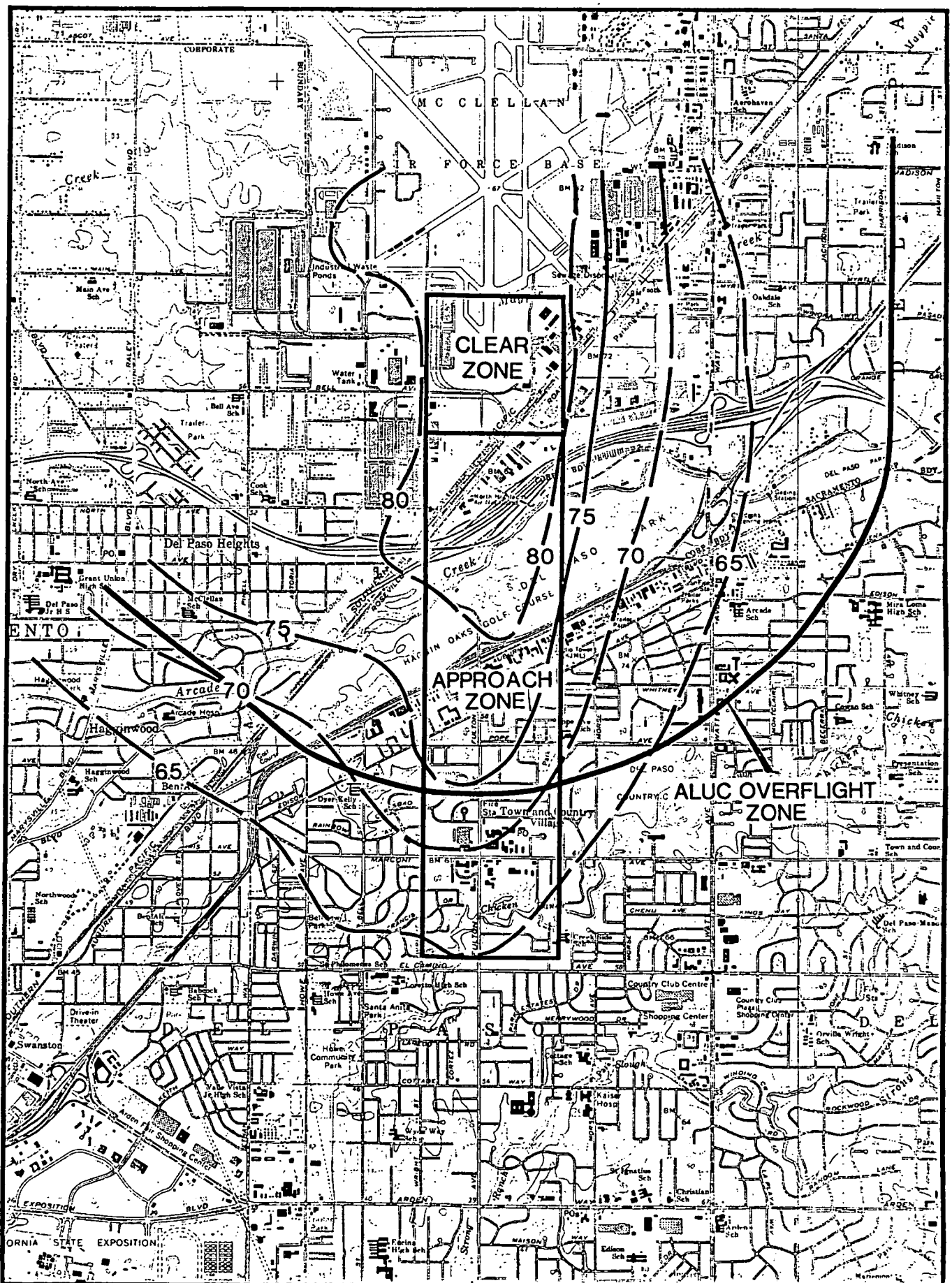


EXHIBIT D-2. ALUC CONSTRAINTS (REVISED)

Vegetation and Wildlife Summary

The following is a brief summary of the significant impacts and feasible mitigation measures for each alternative component of the Del Paso Regional Park Master Plan that relate to vegetation and wildlife. The impacts of each improvement, including the three parking lot alternatives, are summarized separately.

Sports Complex 1

Significant Impacts

- 1) Vernal pools would be covered by the sports complex.
- 2) Significant portions of oak regeneration areas would be removed.
- 3) Remaining portions of the oak savanna and the creek and its riparian vegetation would be degraded by increased human use.
- 4) Proximity of the sports complex to the riparian zone could result in displacement of native species by nonnative species which adapt well to human presence.

Mitigation Measures

- 1) Vernal pools could be relocated or the sports complex could be redesigned to avoid the vernal pools.
- 2) The sports complex would have to be redesigned to avoid the oak regeneration areas.
- 3) Use post and cable system and other park management tools to control indiscriminate access to resource areas.
- 4) Plant native vegetation for landscaping to avoid attracting exotic wildlife species.

Sports Complex 2

Significant Impacts

- 1) Vernal pools in the northern half of the parcel would be lost to development or heavily impacted by development.
- 2) Some degradation of the oak savanna would occur from human use associated with the proposed facility or the access provided by it.
- 3) The location of the facility would result in less impact on riparian wildlife and adjacent foraging areas than Sports Complex 1 but would still impact these resources.

Mitigation Measures

- 1) Redesign complex to avoid vernal pools or consider relocation of vernal pools.
- 2) Use post and cable system and other park management tools to control indiscriminate access to resource areas.
- 3) Maximize natural area between Arcade Creek and sports complex.

Sports Complex 3

Significant Impacts

- 1) The vernal pool in the southern portion of the site would be lost to development.
- 2) Impacts of human use on oak savanna adjacent to the creek would be less than with the other two alternatives due to increased disturbance between the creek and the proposed facilities. The increased access to the riparian zone and oak savanna would still increase the opportunity for habitat degradation.
- 3) The location of the facilities would result in less impact on riparian wildlife and adjacent foraging areas than Sports Complex 1 or 2 but would still impact these resources.

Mitigation Measures

- 1) Redesign complex to avoid vernal pools or consider relocation of vernal pools.
- 2) Use post and cable system and other park management tools to control indiscriminate access to resource areas.
- 3) Maximize natural area between Arcade Creek and sports complex.

Access Road A

Significant Impacts

- 1) Riparian vegetation would be removed for bridge crossing.
- 2) a) In association with the parking lot from alternative 1, this access road would have limited impacts. The major impacts would be due to the parking lot.

- b) If Access Road A is extended to the other parking lots (from alternatives 2 and 3), it could bisect the oak savanna and directly impact oak regeneration areas. Alternatively Access Road A could parallel the riparian corridor which would be damaging to wildlife.
- 3) The access provided by the road will provide a greater opportunity for human degradation of park resources.
- 4) A direct loss of wildlife habitat and disruption of the continuous vegetational corridor west of Watt Avenue which may reduce its value as wildlife habitat (this is also an aesthetic impact).
- 5) On-grade crossing of the road by wildlife will result in vehicle-wildlife collisions and the loss of wildlife.
- 6) Heritage-size oaks may be in the path of the roadway.
- 7) Single road emergency access could hinder fire equipment if an accident or traffic congestion occurs.
- 8) Separate creek crossings for utilities could result in additional impacts.

Mitigation Measures

- 1) Limit loss of biological resources to the area required by the bridge.
- 2) b) The access road would have to be designed in an attempt to minimize impacts to regenerating oaks and the oak savanna while also minimizing the impacts to wildlife along the riparian corridor.
- 3) Use park management techniques to control indiscriminate access to resource areas.
- 4) No mitigation is available for these impacts.
- 5) Install fencing and provide space under bridge to keep wildlife off access road.
- 6) Shift the roadway alignment to avoid heritage-sized oaks.
- 7) Use the golf course maintenance road to provide emergency access via Fulton Avenue.
- 8) Incorporate creek crossings for utilities and the access bridge into one crossing.

Access Road B

Significant Impacts

- 1) Riparian vegetation would be removed for bridge crossing. The road would also impact riparian vegetation where it parallels the creek.
- 2) The access road will provide greater opportunity for human degradation of the natural area.
- 3) The bridge across Arcade Creek would cause a direct loss of wildlife habitat and would disrupt the continuous vegetational corridor west of Watt Avenue, which may reduce its value as wildlife habitat.
- 4) On-grade crossing of the road by wildlife will result in vehicle-wildlife collisions and the loss of wildlife.
- 5) Additional disturbance to wildlife may result from the access road paralleling the creek because of loss of riparian habitat and the impact of headlights and noise from the traffic.

Mitigation Measures

- 1) Minimize loss of biological resources during construction and in the long run by careful bridge placement. Redesign the access road so it will not parallel the creek.
- 2) Use post and cable barrier system and other park management techniques to control indiscriminate access to resource areas.
- 3) None available.
- 4) Provide fencing and space under bridges to keep wildlife off access road.
- 5) Examine alternative alignments for access to the softball complex.

Access Road C

Significant Impacts

- 1) Riparian vegetation would be removed for bridge crossing. The road would also impact riparian vegetation where it parallels the creek.
- 2) The access road will provide greater opportunity for human degradation of the natural area.

- 3) The portion of the road paralleling Watt Avenue would directly or indirectly impact the large oak trees on the eastern edge of this parcel. Both the large oaks located near the road would turn south to parallel Watt and the large oak located farther south, which is only 50 feet from the fence along Watt, would be significantly impacted.
- 4) The bridge across Arcade Creek would cause a direct loss of wildlife habitat and would disrupt the continuous vegetation corridor west of Watt Avenue, which may reduce its value as wildlife habitat.
- 5) On-grade crossing of the road by wildlife will result in vehicle-wildlife collisions and the loss of wildlife.
- 6) Additional disturbance to wildlife may result from the access road paralleling the creek because of loss of riparian habitat and the impact of headlights and noise from the traffic.

Mitigation Measures

- 1) Minimize loss of biological resources during construction and in the long run by careful bridge placement. Redesign the access road so it will not parallel the creek.
- 2) Use post and cable barrier system and other park management techniques to control indiscriminate access to resource areas.
- 3) Redesign the access road to avoid directly impacting oaks and follow techniques for protecting oak trees in Appendix I of the DEIR to avoid indirect impacts.
- 4) None available.
- 5) Provide fencing and space under bridges to keep wildlife off access road.
- 6) Examine alternative alignments for access to softball complex.

Parking Lot (from Alternative 1)

Significant Impacts

- 1) Northern edge of the parking lot within 100 feet of the riparian zone would be a source of disturbance to wildlife. Valuable habitat for raptors, ground dwelling birds, mammals, and reptiles would also be disturbed.

- 2) Several heritage sized-oaks are located on the parking lot site. They will be retained, but may suffer high mortality even if special precautions are taken.

Mitigation Measures

- 1) Maximization of natural area between Arcade Creek and the parking lot by shifting development to the south would minimize disturbance to wildlife.
- 2) Techniques for protecting oak trees are included in Appendix II of the DEIR.

Parking Lot (from Alternative 2)

Significant Impacts

No potentially significant impacts are associated with this parking lot alternative.

Parking Lot (from Alternative 3)

Significant Impact

- 1) The vernal pool just north of the Auburn Boulevard on-ramp to Business 80 would be eliminated by this parking lot alternative.

Mitigation Measure

- 1) Redesign parking lot to avoid vernal pool. Consider relocation of vernal pool.

Neighborhood Park

Significant Impacts

- 1) An oak regeneration area would be inhibited by development of the neighborhood park.
- 2) Large oak trees would be retained but may suffer high mortality even if special precautions are taken.
- 3) Valuable habitat for foraging raptors would be eliminated.
- 4) Populations of nonnative species in the park would probably increase as most of the unmanaged grassland is replaced by lawn.

Mitigation Measures

- 1) Incorporate the neighborhood park into the proposed day-use area.
- 2) Techniques for protecting oaks are discussed in Appendix I of the DEIR.
- 3) Incorporate the neighborhood park into the proposed day-use area.
- 4) Use native vegetation for landscaping.

Renfree Field Parking Lot

Construction of the Renfree Field parking lot would eliminate foraging habitat for raptors and cover habitat for ground dwelling species; however, this site is not as valuable for wildlife habitat as other areas.

Significant Impact

- 1) Construction of the new Renfree Field parking lot would change the view of the area from open space to parking lot.

Mitigation Measure

- 1) Provide an adequate buffer zone between the parking lot and the science center. Take measures to protect trees separating science center and parking lot. Use native landscaping to screen the view of the parking lot from other areas in the park.

Day-Use Area

Significant Impacts

- 1) Large oak trees would be retained but may suffer high mortality even if special precautions are taken.
- 2) Valuable habitat for foraging raptors would be eliminated.
- 3) Populations of nonnative species in the park would probably increase as most of the unmanaged grassland is replaced by lawn.

Mitigation Measures

- 1) Use the techniques to protect oaks that are described in Appendix I of the DEIR.

- 2) Designate other land within the park for permanent preservation and enhance the value of designated land for wildlife habitat.
- 3) Landscape with native vegetation.

Summary of Environmental Impacts and Mitigation Measures for the
Del Paso Regional Park Master Plan Implementation Program

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
<u>Project Description</u>	Proposed Improvements	Proposes a four-field softball facility, a soccer field, and a 700-space parking lot.	Proposes a four field softball facility, no soccer field, and an 800-space parking lot.	Proposes four separate fields arranged in a linear fashion, no soccer field, and a 400-space parking lot.	Would extend from Longview Drive across Arcade Creek to the Sports Complex 1 parking lot.	Would originate near the Sacramento Horsemen's Association and would continue across Arcade Creek to Sports Complex 2 parking lot.	Would extend from Longview Drive across Arcade Creek. This alignment would parallel the creek until it nears Watt Avenue then the access road would parallel Watt Avenue to the Sports Complex 3 parking lot.	13-acre day use recreational area east of Renfree Field. Repaving and restriping of the existing Renfree Field parking lot and addition of 210-space parking lot. 6-acre neighborhood park west of the existing neighborhood park. Additional 63-acres to be designated as natural habitat.
	Need for Project	Metropolitan Sacramento has 2,153 teams registered with the Amateur Softball Association. The proposed complex would provide for an unmet recreational need in the Sacramento area. In addition, revenues could be generated by hosting tournaments at the proposed facility.	See Sports Complex 1.	See Sports Complex 1.	An access road is required to allow sports complex development.	See Access Road A.	See Access Road A.	The City Parks Master Plan documents the need for day-use areas and neighborhood parks based on surrounding population.
<u>Land Use</u>								
<u>Consistency with Land Use Policies</u>	Impact	Potentially inconsistent with 1982 Sacramento County General Plan and 1984 City Master Plan for Park Facilities and Recreation Services policies calling for acquisition of natural areas, maintaining the natural environment for low intensity uses and requiring that special use areas should not be objectionable for other uses.	See Sports Complex 1.	See Sports Complex 1.	Potentially inconsistent with City and County policies because the proposed road would provide access to a natural habitat area.	See Access Road A.	See Access Road A.	Potentially inconsistent with City and County policies because expansion of the neighborhood park and development of a day-use area would impact oak regeneration along the drainage ditch.
	Significance	Significant adverse impact.			Significant adverse impact.			Significant adverse impact.
	Mitigation Measure	None available.			None available.			None available.

Land Use Conflicts		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
	Impact	Noise from sports complex may disturb golfers and natural area users along the creek.	See Sports Complex 1.	See Sports Complex 1.	Safety hazards to horseback riders where road would cross bridle trails.	See Access Road A.	See Access Road A.	The day-use area and neighborhood park expansion would impact oak regeneration areas.
	Significance	Less than significant.			Less than significant.			Potentially significant.
	Mitigation Measure	Locate the sports complex as far from the creek as possible.			Route trails under bridge or install signing to ensure rider safety.			Shift day-use area and neighborhood park expansion to avoid the regeneration areas.
	Impact	Golf balls may strike softball players.	See Sports Complex 1.	See Sports Complex 1.		Golf balls may hit cars traveling on Access Road B.		
	Significance	Less than significant.				Less than significant.		
	Mitigation Measure	Plant a fast-growing native vegetative barrier to keep golf balls off of softball fields. Install a mesh screen to keep golf balls off of softball fields. Redesign sports complex to avoid golf ball hazards. Redesign eastern portion of golf course to reduce hazards.				Plant a fast-growing vegetative barrier to keep golf balls off of the road. Install a mesh screen to keep golf balls off of the road. Redesign access road to avoid golf ball hazards.		
	Impact	Located in the Airport Land Use Commission's Overflight Zone. Advisory guidelines recommend against locating uses which may result in large numbers of people in this area due mainly to noise problems and safety concerns.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.
	Significance	Significant.						
	Mitigation Measure	None.						
	Impact	Located in the height restriction area which prohibits anything on-site from extending higher than 150 feet.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.
	Significance	Less than significant.						
	Mitigation Measure	Do not allow anything on-site to extend higher than 150 feet.						
	Impact	Compatible with McClellan AFB Air Installation Compatible Use Zone recommendations.	See Sports Complex 1.	See Sports Complex 1.				See Sports Complex 1.

	<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
Significance	Less than significant.						
Mitigation Measure	None.						
Impact	Providing access may result in motorcycle use of bridle trails.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	
Significance	Less than significant.						
Mitigation Measure	Install barriers to prevent motorized vehicle use of bridle trails.						
Impact	Traffic problems may result on weekends when horse trailers and sports complex users will both be using Longview Drive.	See Sports Complex 1.	See Sports Complex 1.				
Significance	Less than significant.						
Mitigation Measure	Implement safety measures on Longview Drive.						
Impact	SMUD 69 kV line that crosses the sports complex site may have to be relocated.	See Sports Complex 1.	See Sports Complex 1.				
Significance	Less than significant.						
Mitigation Measure	None.						
Impact	Development of the sports complex should not significantly impact use of other parks in the area and would supplement the sports complex at Elk Grove Park.	See Sports Complex 1.	See Sports Complex 1.				
Significance	Less than significant.						
Mitigation Measure	None.						
Impact		Elimination of soccer field from sports complex design.	See Sports Complex 2.				
Significance		Less than significant.					
Mitigation Measure		The day-use area could be used as a practice field. League games could be played at County's Cherry Island complex.					

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
	Impact			Reduced amount of parking spaces.				
	Significance			Potentially significant.				
	Mitigation Measure			Utilize off- site parking at LRT station, pro- vide an additional dirt lot for parking, pro- vide shuttle service from the motels along Auburn Boulevard.				
Growth-Inducing Impacts	Impact	None expected.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.
	Significance	Less than significant.						
	Mitigation Measure	None.						
<u>Soils and Geology</u>	Impact	Ponding may occur adjacent to the concession and comfort station areas unless the sites are graded.	See Sports Complex 1.	See Sports Complex 1.	Removal of a small amount of prime agricultural land from future production.	High shrink-swell potential of subsoil may damage roadway.	See Access Road A.	Flooding may occasionally limit the use of the day- use area and the expanded neighborhood park.
	Significance	Less than significant.			Less than significant.	Less than significant.		Less than significant.
	Mitigation Measure	Grade building sites to avoid water ponding near foundations.			None available.	Design road to compensate for the instability of the subsoil.		None.
	Impact							Tilling the day-use area and/or neighborhood park expansion area when wet may result in the formation of a tillage pan.
	Significance							Less than significant.
	Mitigation Measure							Do not disturb the on-site soils when wet.

Vegetation and
Wildlife

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
Vegetation	Impact	Vernal pools would be removed.	Vernal pools in the northern half of the parcel would be lost to development or heavily impacted by development.	Vernal pools adjacent to the nursery would not be directly impacted. The vernal pool in the south would be lost to development.	Riparian vegetation would be removed for bridge crossing.	See Access Road A. The road would also impact riparian vegetation where it parallels the creek.	See Access Road B.	Development of day-use area and neighborhood park expansion may disturb two oak regeneration areas.
	Significance	Potentially significant.	Potentially significant.	Potentially significant.	Potentially significant.			Potentially significant.
	Mitigation Measure	Redesign complex to avoid vernal pools. Consider relocation of vernal pools.	See Sports Complex 1.	See Sports Complex 1.	Minimize or avoid loss of biological resources.			Shift planned locations to minimize impacts on oak regeneration areas.
	Impact	Significant portions of regenerating oak areas would be removed.	It appears from the conceptual drawing that this alternative would avoid direct impacts to the oak regeneration area.	It appears from the conceptual drawing that this alternative would avoid direct impacts to the oak regeneration area.	1) Access Road A would be short and have limited impacts. The major impacts are associated with the parking lot proposed by Alternative 1. 2) Access Road A, if extended to the sports complex area, could bisect the oak savanna and directly impact oak regeneration areas. Alternatively, Access Road A could impact wildlife along the riparian corridor.	Increased potential to harm vegetation because 800 foot segment parallels creek.		Increased potential to harm vegetation because 700 foot segment parallels creek.
	Significance	Potentially significant.	Less than significant.	Less than significant.	1) Less than significant. 2) Potentially significant.	Potentially significant.	Potentially significant.	
	Mitigation Measure	Redesign complex to avoid oak regeneration areas.	None.	None.	1) None. 2) Realign road to minimize impacts to the oak savanna and regenerating oaks while also minimizing the impacts to wildlife along the riparian corridor.	Redesign road so that it will not parallel the creek.	See Access Road B or try to follow existing dirt road to minimize removal of riparian trees.	
	Impact	Large oak trees would be retained but may suffer high mortality even if special precautions are taken.	It appears from the conceptual drawing that this alternative would avoid direct impacts to the large oak trees except for one blue oak.	It appears from the conceptual drawing that this alternative would avoid direct impacts to the large oak trees except for one blue oak.	Access road will provide greater opportunity for human degradation of natural vegetation.	See Access Road A.	See Access Road A.	Large oak trees on the terrace east of Renfree Field would be retained but may suffer high mortality even if special precautions are taken.

	<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
Significance	Potentially significant.	Less than significant.	Less than significant.	Potentially significant.			Potentially significant.
Mitigation Measure	Techniques for protecting oak trees are included in Appendix I of this report.	Shift the sports complex orientation.	Shift the sports complex orientation.	Use park management techniques to control indiscriminate access to resource areas.			Techniques for protecting oak are included in Appendix I of the DEIR.
Impact	Remaining portions of oak savanna and the creek and its riparian vegetation would probably be degraded by the proposed facility or the access provided by it.	Some degradation of the oak savanna would occur from human use associated with the proposed facility or the access provided by it.	Impacts of human use on oak savanna adjacent to the creek would be less than with the other two alternatives due to increased distance between the creek and the proposed facilities. The increased access to the riparian zone and oak savanna would still increase the opportunity for habitat degradation.			The portion of the road paralleling Watt Avenue would directly or indirectly impact the large oak trees on the eastern edge of this parcel. Both the large oaks located near where the access road would turn south to parallel Watt and the large oak located farther south which is only 50 feet from the Watt Avenue fence could be significantly impacted.	
Significance	Potentially significant.	Potentially significant.	Potentially significant.			Potentially significant.	
Mitigation Measure	Use park management tools to control indiscriminate access to resource areas.	See Sports Complex 1.	See Sports Complex 1.			Redesign road to avoid directly impacting oaks and follow techniques for protecting oak trees in Appendix I of this report to avoid indirect impacts.	
Wildlife							
Impact	Northern edge of parking lot within 100 feet of riparian zone would be a source of noise and disturbance to wildlife. The parking lot would also eliminate valuable habitat for raptors and ground cover for ground dwelling birds, mammals, and reptiles.	The location of the facilities would result in less impact on riparian wildlife and adjacent foraging areas, but would still impact wildlife habitat.	Facilities even farther from the creek than Sports Complex 2, but would still impact wildlife habitat.	Construction of bridge across Arcade Creek would cause a direct loss of wildlife habitat and would disrupt the continuous vegetational corridor west of Watt Avenue which may reduce its value as wildlife habitat.	See Access Road A.	See Access Road A.	Construction of the Renfree Field parking lot would eliminate foraging habitat for raptors and cover habitat for ground-dwelling species, however, this site is not as valuable for wildlife habitat as other areas.
Significance	Potentially significant.	Potentially significant.	Potentially significant.	Significant adverse impact.			Less than significant.
Mitigation Measure	Maximize natural area between Arcade Creek and sports complex.	Locate the sports complex as far south as possible.	Locate the sports complex as far south as possible.	None.			None.

	<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
Impact	Use of the riparian area by nonnative species which adapt well to human presence may be increased because of the location of the sports complex near the creek.			On-grade crossing of the road by wildlife will result in vehicle-wildlife collisions and the loss of wildlife.	See Access Road A. This impact would probably be less significant than Access Road A.	See Access Road B.	Development of day-use area and neighborhood park would eliminate valuable wildlife habitat for foraging raptors.
	This could result in nonnative species out-competing native birds for nest sites.						
Significance	Potentially significant.			Potentially significant			Potentially significant.
Mitigation Measure	Plant native vegetation for landscaping to avoid attracting exotic wildlife species.			Provide fencing and space under bridges to keep wildlife off access road.			None.
Impact	Construction would destroy habitat for ground-dwelling birds, burrowing mammals, and depending on the season, nests with eggs or young.	See Sports Complex 1.	See Sports Complex 1.		Additional disturbance to wildlife may result from access road paralleling creek because of loss of riparian habitat, and the impact of headlights and noise from the traffic.	See Access Road B.	Populations of nonnative species in the park would probably increase as most of the unmanaged grassland is replaced with lawn. Such species displace native wildlife.
Significance	Less than significant.				Potentially significant.		Potentially significant.
Mitigation Measure	None.				Examine alternative alignments for access to softball complex.		Plant native vegetation for landscaping.
Impact						Locating the portion of the road along Watt Avenue minimizes the impact on wildlife by preserving a larger contiguous natural area between the creek and the softball complex/parking lot.	
Significance						Less than significant.	
Mitigation Measure						None.	

Water Quality,
Drainage, and
Flood Control

	<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
Impact	If the parking lot is constructed on fill above the 100-year floodplain, the fill will constrict the flood-carrying capacity of the floodplain, and increase the water surface elevation upstream which could aggravate existing flooding problems.	None.	None.	Could partially obstruct creek flow due to the presence of piers, the bridge deck itself, bridge approaches, or the collection of floating or submerged debris on the bridge deck or piers. This could result in increased water surface elevations which may increase upstream flooding.	See Access Road A.	See Access Road A. Much of the roadway south of the bridge would be in the floodplain and subject to flooding to a depth of 2 feet in the 100-year storm. This could cause safety problems and may require light maintenance to remove silt and debris from the roadway.	The Renfree Field parking lot may be subject to periodic flooding and deposition of silt and debris. It may not be possible to raise the parking lot above the floodplain without constricting creek flow and causing upstream flooding.
Significance	Potentially significant.				Potentially significant.	Less than significant.	Less than significant.
Mitigation Measure	Careful engineering design will be required to minimize this impact.			Constructing the bridge deck to clear the water surface of the 100-year flood would partially mitigate this problem, but the south end of the bridge would have to connect to a raised roadway which would itself partially obstruct flood flows.		Provide for road closure prior to flooding. Post and cable barriers along the road may increase safety, but they may also entrain debris.	Provide design and safety features to minimize flood impacts on Renfree Field parking lot. A gate should be provided to allow closure of the area during high water.

Traffic and
Circulation

<u>Traffic</u>							
Impact	The 1995 LOS at the Watt Avenue/Longview Drive intersection is expected to fall from C to C-D with project implementation.	See Sports Complex 1.	See Sports Complex 1.	Alignment not expected to have any significantly adverse traffic impacts.	See Access Road A.	See Access Road A. The greater length of this road and its curving alignment may increase traffic safety problems.	Implementation of these improvements is not expected to result in any significantly adverse traffic impacts.
Significance	Less than significant.			Less than significant.		Less than significant.	Less than significant.
Mitigation Measure	None.			None.		Redesign road to change alignment.	None.

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
	Impact	The 1995 LOS at the Watt Avenue/Auburn Boulevard intersection will not change with project implementation. Traffic volumes are, however, expected to exceed the capacity of this intersection.	See Sports Complex 1.	See Sports Complex 1.	Conflicts between horses and automobiles would be minimized by routing the bridle trails under the bridge.	Auto/horse conflicts are anticipated because the access road will cross the bridle trail at grade level.	See Access Road B.	
	Significance	Less than significant.			Less than significant.	Less than significant.		
	Mitigation Measure	None.			Route bridle trails under access road.	Route bridle trails under access road or provide horse crossing signs and possibly crossing guards at major sports tournaments.		
Parking	Impacts	The ±700 proposed parking spaces are expected to be adequate. Some overflow parking may be necessary during major sports tournaments.	The ±800 proposed parking spaces are expected to be adequate. Some overflow parking may be necessary during major sports tournaments.	The ±400 parking spaces are not expected to be able to accommodate peak parking demand by sports complex users. This could result in parking on lawns and natural areas in the complex.				
	Significance	Less than significant.	Less than significant.	Potentially significant.				
	Mitigation Measure	Provide an additional dirt lot for overflow parking.	Provide an additional dirt lot for overflow parking.	Construct a ±700-800 parking space area or disk the area adjacent to the parking lot to provide a dirt lot for overflow parking.				
Transit	Impact	The parking lot could be used as a park-and-ride lot for the planned LRT stop near I-80 and Watt.	The parking lot would not provide as convenient access to the planned LRT station as would the Sports Complex 1 lot.	See Sports Complex 2. Parking at the LRT terminal could be used to accommodate some overflow parking during sports tournaments.				
	Significance	Less than significant.	Less than significant.	Less than significant.				
	Mitigation Measure	None.	None.	None.				

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
<u>Air Quality</u>								
	Impact	The master plan implementation is expected to be generally consistent with the regional air quality plan. Emissions from vehicle travel will contribute incrementally to regional smog problems, but this is not considered a significant impact. None of the participants, spectators at the sports complex, or other park users will be exposed to carbon monoxide levels exceeding air quality standards.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.
	Significance	Less than significant.						
	Mitigation Measure	None.						
<u>Noise</u>								
	Impact	The increase in ambient noise level resulting from the sports complex will generally be too small to notice.	See Sports Complex 1.	See Sports Complex 1.	Similar to increased noise levels resulting from Sports Complex 1.	See Access Road A.	See Access Road A.	These improvements should not result in an increase in the ambient noise level.
	Significance	Less than significant.			Less than significant.			Less than significant.
	Mitigation Measure	None.			None.			None.
	Impact	Players and spectators will be exposed to high ambient noise levels from traffic and low-flying aircraft. The noise levels may be higher than is desirable, but should not interfere significantly with activities at the complex.	See Sports Complex 1.	See Sports Complex 1.				Neighborhood park and day-use area users will be exposed to high ambient noise levels, but this should not significantly interfere with the use of these facilities.
	Significance	Less than significant.						Less than significant.
	Mitigation Measure	None.						None.
<u>Aesthetics</u>								
	Impact	The proposed parking lot could have an adverse impact on the views of persons using the creekside trail.	Visual impact less severe than Sports Complex 1.	Least impact on aesthetic quality of the site as viewed from the creekside trail. Linear configuration and 400-space parking lot would maximize the amount of open space.	Construction would result in the destruction of a 30-foot-wide path of riparian vegetation for bridge placement. This would create a break in the continuous vegetation west of Watt Avenue.	See Access Road A.	See Access Road A.	Construction of the new Renfree Field parking lot would change the view of the area from open space to parking lot.

	<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
Significance	Less than significant.	Less than significant.	Less than significant.	Significant adverse impact.			Potentially significant.
Mitigation Measures	Plant a vegetational buffer around the north and west sides of the parking lot. Use native vegetation for landscaping. Redesign sports complex to use native vegetation to reduce its visibility from other areas within the park. Maximize area between Arcade Creek and sports complex.	Redesign sports complex to use native vegetation to reduce its visibility from other areas of the park. Maximize area between Arcade Creek and sports complex. Use native vegetation for landscaping. Preserve oak trees.	See Sports Complex 2.	None available.			Provide adequate buffer zone between parking lot and science center. Take measures to protect trees separating science center and parking lot. Use landscaping to screen the view of the parking lot from other areas in the park.
Impact	Several heritage-size oaks are located on the proposed parking lot site.		This complex would be more visible from the golf course and Auburn Boulevard.	Heritage-size oaks may be in the designed roadway.	Views from Horsemen's Association may be impacted.	The roadway would parallel the riparian corridor for 700 feet, which would constitute a visual impact to trail users.	No aesthetic impacts would result from paving the existing parking lot.
Significance	Potentially significant.		Less than significant.	Potentially significant.	Potentially significant.	Potentially significant.	Less than significant.
Mitigation Measure	Techniques for protecting oak trees are included in Appendix II of this report.		Use vegetational buffer and/or facility redesign to screen views from golf course and Auburn Boulevard.	Design road to avoid heritage oaks.	Design road and road landscaping to minimize impacts on views from Horsemen's Association.	Design road and road landscaping to minimize impacts on views from the creek-side trail.	Landscaping would make the existing parking lot more attractive.
Impact	At least one heritage-sized oak is located on the sports complex site and would have to be removed.			Placement of this road through the natural area south of the riparian zone would fragment the area and may result in the need to remove oak trees.	See Access Road A.	See Access Road A.	
Significance	Less than significant.			Potentially significant.			
Mitigation Measure	None.			Design road to avoid as many oak trees as possible.			

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
<u>Light and Glare</u>	Impact	Light and glare nuisances to freeway motorists.	See Sports Complex 1.	See Sports Complex 1.				
	Significance	Potentially significant.						
	Mitigation Measure	After installation, adjust lights so that they do not cause freeway glare. Use vegetational buffers to further reduce glare.						
	Impact	Lights could cause birds that use photo-period as a cue for breeding to start their reproductive cycle at the wrong time of year which would reduce the chance of offspring survivals.	See Sports Complex 1.	See Sports Complex 1.	Increase in light from automobile traffic.	See Access Road A.	See Access Road A.	Parking lot lighting not expected to increase ambient light levels.
	Significance	Uncertain.			Less than significant.			Less than significant.
	Mitigation Measure	Direct lights away from riparian zone.			None.			None.
<hr/>								
<u>Public Services and Utilities</u>								
Water	Impact	Approximately 3,000 gpd of potable water would be required.	See Sports Complex 1.	See Sports Complex 1.	A separate creek crossing for water transmission lines would adversely impact the creek.	See Access Road A.	See Access Road A.	The neighborhood park expansion and the day-use area would require additional irrigation.
	Significance	Less than significant.			Potentially significant.			Less than significant.
	Mitigation Measure	Minimize water transmission and development costs.			Route lines across proposed bridges.			None.
Sewer	Impact	Approximately 2,625 gpd of flow would be generated.	See Sports Complex 1.	See Sports Complex 1.	A separate creek crossing for sewer lines would adversely impact the creek.	See Access Road A.	See Access Road A.	No anticipated impacts.
	Significance	Less than significant.			Potentially significant.			Less than significant.
	Mitigation Measure	None.			Route line across proposed bridges.			None.
	Impact	Extending sewer lines across proposed bridge would require a pump station.	See Sports Complex 1.	See Sports Complex 1.				
	Significance	Less than significant.						
Solid Waste	Mitigation Measure	Design pump station to avoid settling of solids and clogged lines.						
	Impact	4-5 cubic yards/day of solid waste would be generated.	See Sports Complex 1.	See Sports Complex 1.	No impacts are anticipated.	See Access Road A.	See Access Road A.	Large group activities in day-use area may require additional solid waste removal services.
	Significance	Less than significant.						Less than significant.

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
	Mitigation Measure	Increase park maintenance staff.						Provide special solid waste removal services for large group activities.
	Impact	Additional people in the park would increase littering.	See Sports Complex 1.	See Sports Complex 1.				See Sports Complex 1.
	Significance	Less than significant.						
	Mitigation Measure	Provide ample waste containers to discourage littering.						
Road Maintenance	Impact	Heavy maintenance cost of \$.25 per square yard of pavement per year. This parking lot would be the second largest of the three alternatives.	See Sports Complex 1. This parking lot would be the largest of the three alternatives.	See Sports Complex 1. This parking lot would be the smallest of the three alternatives.	Shortest proposed road; lowest heavy maintenance cost.	Longest proposed road; highest heavy maintenance	Intermediate heavy maintenance cost.	The new Renfree Field parking lot would result in heavy maintenance costs.
	Significance	Less than significant.	Less than significant.	Less than significant.	Less than significant.	Less than significant.	Less than significant.	Less than significant.
	Mitigation Measure	Minimize asphalt surface area by providing compact car spaces. Require Department of Parks and Community Services to budget money for heavy maintenance.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.
	Impact	A portion of the asphalt surface may be within the 100-year floodplain which would result in increased light maintenance costs.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.
	Significance	Less than significant.						
	Mitigation Measure	Locate asphalt surfaces outside the 100-year floodplain.						
Natural Gas and Electric Service	Impact	73,500 kW hours of energy would be required.	See Sports Complex 1.	See Sports Complex 1.	None anticipated.	None anticipated.	None anticipated.	None anticipated.
	Significance	Less than significant.						
	Mitigation Measure	None.						
	Impact	Service extension could impact the creek and surrounding vegetation.	See Sports Complex 1.	See Sports Complex 1.				
	Significance	Potentially significant.						
	Mitigation Measure	Require creek crossing to be in bridge area.						
Fire	Impacts	Inadequate fire flows, distance from paved surfaces, and improper hydrant spacing could hinder fire protection.	See Sports Complex 1.	See Sports Complex 1.	Single road emergency access could hinder fire equipment if	See Access Road A.	See Access Road A.	None anticipated.

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
	Significance	Potentially significant.			an accident or traffic congestion occurs.			
	Mitigation Measure	Provide adequate fire flows. Locate fire hydrants as required. Locate buildings within 150 feet of paved surfaces.			Potentially significant.			
Police	Impact	Proximity of the restrooms and concession to the parking lot is a patrol advantage.	Restrooms and concession would be difficult to patrol because of distance from parking lot.		Easiest proposed road to patrol. Least potential for traffic congestion and vehicle accidents.	Long winding road will increase traffic accidents and congestion. Road configuration could encourage vehicles to park on road when lot is full, which could cause traffic congestion and damage to biological resources.	Long access road not desirable from a patrol standpoint. Limited number of parking spaces may encourage parking along the access road, which could cause traffic congestion and damage to biological resources.	Lack of lighting at Renfree Field parking lot could result in increased vandalism and personal safety problems.
	Significance	Less than significant.		Less than significant.	Less than significant.	Potentially significant.	Potentially significant.	Less than significant.
	Mitigation Measure	None.	Redesign sports complex to aid police patrol.		None.	Install barriers to prevent parking along access road.	Install barriers to prevent parking along access road.	Illuminate parking area to two foot-candles.
	Impact	The concession, restroom, and equipment storage areas present an attractive target for vandals.	See Sports Complex 1.	See Sports Complex 1.				
	Significance	Less than significant.						
	Mitigation Measure	Design buildings with security in mind. Close the park at night to reduce police protection problems.						
	Impact	Lack of emergency access could result in problems responding to incidents when the access road is blocked by traffic congestion or an accident.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	
	Significance	Potentially significant.						
	Mitigation Measure	Extend Haggin Oaks Golf course maintenance road for use as emergency access.						

		<u>SPORTS COMPLEX 1</u>	<u>SPORTS COMPLEX 2</u>	<u>SPORTS COMPLEX 3</u>	<u>ACCESS ROAD A</u>	<u>ACCESS ROAD B</u>	<u>ACCESS ROAD C</u>	<u>EAST SIDE IMPROVEMENTS</u>
<u>Cultural Resources</u>	Impact	Construction and grading for the sports complex access road and parking lots may adversely affect cultural resources.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.
	Significance	Potentially significant.						
	Mitigation Measure	A qualified archeologist should monitor construction activities and work should be halted if artifacts are found so that the archeologist can examine the find and recommend preservation or possible mitigation, if the find is significant.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.	See Sports Complex 1.

Section 3

RESPONSES TO COMMENTS ON THE DEIR

Section A: Introduction

(Except for typographical corrections,
all comments are verbatim)

A-1

Comment: The Draft EIR for implementation of the Del Paso Regional Park Master Plan requires extensive revision. We believe so much confusion would result from handling these revisions through an addendum to the Draft that the Final EIR should be a completely new document. (Steve Talley for Arcade Creek Restoration Project [ACRP])

Response: CEQA does not require that a Draft EIR be completely revised in response to comments. See the discussions in Section 1, Introduction and Section 2, Key Revisions of this FEIR.

A-2

Comment: Problems related to the highly variable quality of different sections of the EIR. Only section "K" Aesthetics appears to be excellent. Sections "D" on Land Use and the Vegetation Component of Section "F" should be rated as "good". The remaining sections are "adequate" except for the Project Description (B), Summary of Findings (C), and Cumulative Impact (O) Sections which are considered inadequate and should receive extensive revision (see Appendix 1 for specific comments). (Steve Talley for ACRP)

Response: Comment noted. The Project Description, Summary, and Cumulative Impact discussions have been revised. See Section 2, Key Revisions.

A-3

Comment: Problem 3. Public Relations: Environmentally sensitive development plans and innovative mitigation measures should be forwarded immediately by the City of Sacramento to Jones & Stokes Associates. (Steve Talley for ACRP)

Response: The City's environmental consultants have been kept constantly informed of all submittals and comments during the EIR process. The consultants have worked very closely with the City during the preparation of the DEIR and have discussed many aspects of the EIR with interested groups and members of the public.

A-4

Comment: The Department of Parks and Community Services should move swiftly to incorporate environmentally sensitive designs into the layout for Del Paso Regional Park Master Plan developments. They should also inform their consultants of the special need for natural habitat mitigation within the park and encourage their effort to analyze the extensive mitigation proposals submitted by the Arcade Creek Restoration Project and other groups on Nov. 14, 1984. (Steve Talley for ACRP)

Response: The City's consultants are aware of the need for environmentally sensitive mitigation measures and have advised the City of such measures throughout the EIR preparation process. Both the City and the consultants have reviewed the suggestions for mitigation made by the commentor and have incorporated many of those suggestions into the EIR.

In developing the final design of the facilities in the park, the City will use its best efforts to include environmentally sensitive mitigation measures sufficient to avoid or compensate for significant environmental impacts.

A-5

Comment: The issue is not whether we should preserve these priceless components of our natural heritage or develop the areas for our immediate active recreation needs. All of the forementioned natural assets can be preserved if the athletic complex and other developments are designed with major emphasis upon preserving natural values and these developments are linked to an innovative mitigation package. A suggested mitigation package is outlined in our Nov. 14, 1984 correspondence to the Del Paso Regional Park Master Plan Environmental Assessment Team. (Steve Talley for ACRP)

Response: See response to Comment A-4.

A-6

Comment: Section A, INTRODUCTION, Purpose of EIR. In its present form the Del Paso Regional Park Master Plan developments constitute an inefficient carnage of rare and very rare Central

Valley plant communities to accommodate short term active recreation needs. Whether the word "designated" is used or not ANY allusion that these developments somehow are beneficial to either vegetation or wildlife within the region is so offensive to those knowledgeable of the issues that ALL such references should be rigorously expunged from the final document! (Steve Talley for ACRP)

Response: The City acknowledges in the DEIR that the proposed improvements to implement the Master Plan may have significant adverse impacts on the environment. Admittedly the Master Plan does not propose adding any new natural areas to the park. However, implementation of the Master Plan calls for "designating" (i.e., permanently protecting) 63 additional acres of natural area that are not currently afforded any guaranteed protection. In addition, the City is recommending designation of the areas delineated on Exhibit 2-4 as natural habitat area. This is certainly more beneficial for those areas than leaving them unprotected and subject to future development.

A-7

Comment: Sacramento Audubon would like to underline all of the many carefully considered, environmentally sound recommendations and corrections that the Arcade Creek Restoration Project has advanced to Jones and Stokes and to the City. We are looking forward to a much improved Arcade Creek and would like to offer our organization's assistance to anyone else who is working for a protected and enhanced Del Paso Park Nature Area. (Alta Tura for Sacramento Audubon Society)

Response: Comment noted. No response necessary.

A-8

Comment: The State Clearinghouse submitted the above named Draft Environmental Impact Report (DEIR) to selected state agencies for review. The review period is closed and the comments of the individual agency(ies) is(are) attached. If you would like to discuss their concerns and recommendations, please contact the staff from the appropriate agency(ies).

When preparing the final EIR, you must include all comments and responses. (CEQA Guidelines, Section 15132). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the commenting agency(ies) by writing to them, including the State Clearinghouse number of all correspondence.

In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect and it must support

its actions with a written statement of overriding considerations for each unmitigated significant effect (CEQA Guidelines Section 15091 and 15093).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk. Please contact Peggy Osborn at (916) 445-0613 if you have any questions about the environmental review process. (State Clearinghouse)

Response: Comment noted. No response necessary. The letter merely transmits comments from other state agencies.

Section B: Project Description

(Except for typographical corrections,
all comments are verbatim)

B-1

Comment: The City of Sacramento did offer two alternatives to their softball complex but their drawings were so grossly inaccurate and their scale so questionable they could not be analyzed. Possibly as a result of these bad data inputted to Jones and Stokes the Draft EIR is so inadequate in the opinion of ACRP that it cannot be salvaged without a major rewriting.

Problems related to failure of Jones & Stokes Associates to incorporate valid comments and data generated by the Notice of Preparation Hearing (Oct. 8, 1984) into the Draft EIR. (Steve Talley for ACRP)

Response: When the DEIR was prepared, the consultant relied on the only maps that were available. The consultant was aware that these maps were not to scale, but the City felt that a meaningful analysis could nevertheless be performed since potential impacts could be identified without more detailed maps. During the public review period, more detailed maps of the alternatives were prepared (see revised Exhibits B-3, B-4, B-5).

The City does not agree that the lack of detail on the original maps and the resulting analysis rendered the document inadequate requiring a complete revision. The main thrust of the DEIR was a comparison of alternatives, which was adequately covered despite the level of detail on the maps. Since the more detailed maps were available for preparation of the FEIR, all of the Responses to Comments were based on a careful review of the revised maps.

B-2

Comment: ACRP presented detailed topographically precise drawings and analysis of alternative athletic complex and access route plans during the Notice of Preparation hearing on October 8th and again in a more detailed letter on the 15th of October. Both of these data packages were available well before the October 19th deadline for inclusion in the Draft EIR. (Steve Talley for ACRP)

Response: In preparing the DEIR, the consultant was aware of the detailed maps and other data submitted by ACRP and considered that information in their analysis.

The City decided, however, not to include those maps in the DEIR for several reasons. First, the City generally does not include verbatim copies of Notice of Preparation (NOP) comments in DEIRs. Second, the City was in the process of preparing its own revised maps and did not want to confuse reviewers of the DEIR with two sets of maps.

B-3

Comment: ACRP is deeply concerned that a very substantial data base respecting the natural area values and possible mitigation for master plan development was provided to both Jones & Stokes and the City of Sacramento well before the NOP deadline has not been incorporated into the Draft EIR. ACRP is now undertaking a detailed analysis of each section of the draft EIR and will provide copies of our assessment to parties interested in testifying at the public meetings scheduled for November 14th and 28th. (Steve Talley for ACRP)

Response: See response to Comment B-2.

B-4

Comment: In 1981, the Department of Community Services supported the Sacramento Science Center's proposal of developing a "Greenlot" concept parking facility. A description of this project is attached here. (Kay Antunez, Sacramento Science Center and Junior Museum)

We would like to include this proposed development concept in the final EIR for the Del Paso Regional Park Master Plan.

Response: Comment noted. No response necessary.

B-5

Comment: Fulton Avenue access should be reassessed, and given much more consideration. It would be close to parking in Plan 2 and 3, and traffic density on Fulton is far less. A Morse Ave. access would have these same advantages, but cost of bridging would be some \$500,000. (Betty Matyas for The California Native Plant Society [CNPS])

Response: In its response to the NOP, the City Traffic Engineering Department expressed several concerns about an access road from Fulton Avenue. First, it is approximately 1 mile from Fulton Avenue to the development site. This vastly

exceeds the City's recommended street length without providing a second access. This means a loop street arrangement would have to be constructed, doubling the roadway length to 2-miles and pushing roadway costs to over \$500,000. Without this loop street, a 1 mile dead-end access road presents serious safety hazards. Second, the interchange facilities at Fulton Avenue and Business 80 are antiquated and less capable of handling additional traffic in an efficient manner than Watt Avenue. The Fulton Avenue facility also does not provide good traffic distribution. Third, it would not be desirable to mix motorists and golfers. Such action would probably increase potential claims against the City for property damage due to automobiles being struck by golf balls.

With regard to an access road from Morse Avenue, any access road requiring a freeway crossing is considered economically infeasible to serve only a sports complex.

B-6

Comment: For the area east of Renfree Field: since the existing neighborhood park has picnic facilities, it would be unnecessary to duplicate them in East Del Paso Park, (Betty Matyas for CNPS)

Response: As shown in Exhibit 2-4, the City is currently proposing that the neighborhood park and day-use area be combined with the neighborhood park adjacent to Renfree Field. This location would encourage use by persons attending sports events at Renfree Field and would avoid duplicating the facilities in the existing neighborhood park.

B-7

Comment: For the area east of Renfree Field: that access be reassessed, and a route be chosen that would be least damaging to the environment, safer for horse traffic, and would not add to the already unpleasant auto traffic difficulties. (Betty Matyas for CNPS)

Response: See response to Comment B-5. Although the three access routes considered in the DEIR each have some significant impacts associated with them, they were selected for consideration in the EIR because they are economically feasible. Impacts that have been determined to be infeasible or contrary to safety standards need not be considered in an EIR.

B-8

Comment: Number of Softball Fields. Given that the conceptual master plan adopted by the City Council in March, 1983,

provided a 3 field softball complex, I find it strange that the DEIR only considers 4 field complex alternatives. The possibility of a 4 field complex was not discussed during the 5 public planning meetings held for the conceptual plan between September, 1982 and March, 1983, and to my knowledge, the City Council has not amended the master plan to include a fourth field, yet the DEIR assumes that there will be 4 fields. In light of the numerous adverse environmental impacts associated with development of the sports complex (including parking lots and access routes), the inconsistencies of developing the natural habitat area with City and County policies to preserve, maintain and acquire natural habitat, and the fact that only 3 fields were approved in the conceptual master plan, it seems logical that a 3 field complex alternative should have been evaluated in the DEIR. The Final EIR must include an assessment of a 3 field complex (and associated parking lot) in order to assess the environmental tradeoffs between a 3 field and 4 field complex. (Nancy Lindsay)

Response: The three-field complex shown in the Del Paso Park Master Plan was a conceptual design only. In adopting the Park Master Plan the City agreed to undertake project-specific planning and environmental studies at the time of implementation. It was fully intended that for each aspect of the Master Plan, further study and refinement would be necessary before arriving at precise alternatives to be analyzed in subsequent EIRs. In this case, when the City undertook to specifically define the sports complex alternatives, it concluded that a four-field complex would better serve the needs of the softball community. In addition, the recent approval of the new County soccer facility at Cherry Island in Rio Linda diminished the need for the soccer field.

Since the original Master Plan was conceptual, there is no requirement that the three-field complex be considered in the EIR.

Further, even if the three-field complex was considered in the EIR, since it would include a soccer field, the total amount of natural area disturbed by construction would be similar and the impacts would likely be the same.

B-9

Comment: Maps of Alts 1, 2 and 3 are presented on pages 10, 11 and 12. These maps are drawn on different scales and with different orientations. In order to compare the impacts of different configurations of the sports complex, parking lot and access route, the final EIR must present maps of the 3 alternatives using the same scale of orientation. Moreover, the maps presented on p. 10-12 are inaccurate. The Final EIR must contain maps based on the land survey conducted by the city and

must present the existing vegetation accurately, especially the location of the heritage Oak trees. (Nancy Lindsay)

Response: Revised maps of the sports complex alternatives (at the same scale) have been prepared (see revised Exhibits B-3, B-4, and B-5 in Section 2, Key Revisions of this FEIR). In addition, base maps of the park showing existing environmental constraints have been prepared (see Exhibits 2-2 and 2-3).

B-10

Comment: The DEIR does not contain any specific maps for the proposed developments in East Del Paso Park. These developments include a parking lot west of the existing Renfree Field parking lot, Natural habitat area, DURA and a Neighborhood Park. The lack of maps for these developments, often referred to as "other improvements" in the DEIR, is indicative of the lack of discussion these developments received in the DEIR. The Final EIR must contain specific maps of all of the proposed developments for the park including maps of any recommended configurations. (For example, the DEIR recommends merging the proposed DURA and Neighborhood Park. p. 43) (Nancy Lindsay)

Response: Maps of the "East Side Improvements" in the eastern portion of the park have been included. See Exhibit 2-4 in Section 2, Key Revisions of this FEIR.

B-11

Comment: Both orally at the public meeting on October 8, 1984 and in writing in my comments on the Notice of Preparation I requested the City to consider alternative access routes to the sports complex including access from Fulton Ave, Business 80 and Watt Ave. On p. 13, the DEIR says that access from Fulton was considered, but was deemed unsafe and too expensive, and access from Business 80 was also considered infeasible. However, the DEIR does not contain any documentation to support these conclusions. It appears that alternatives to the Longview Dr. access route were not really considered. (Nancy Lindsay)

Response: Alternative access roads were considered prior to and during the preparation of the DEIR. For a discussion of Fulton Avenue access see response to Comment B-5.

An access route from Business 80 would require the approval of Caltrans. According to the Caltrans Office in Marysville (District 3), there are several serious problems with a Business 80 access road. These are: 1) Caltrans strongly discourages partial intersections and isolated on/off ramps. Such intersections are inconvenient for some drivers who must travel out of direction to reach their ultimate destination. In addition, isolated ramps encourage wrong way entries onto the

freeway, a serious safety hazard; 2) the distance between the existing interchanges at Watt Avenue and Fulton Avenue is too short to justify an additional interchange. There would be inadequate room to allow drivers to merge onto and off of the freeway; 3) Business 80 already experiences excess capacity due to the existing traffic and a new access would compound the problem. (Hanson pers. comm.)

An access road to Business 80 would require amendments to the regional and state Transportation Improvement Plans, which would take several years to pursue with no guarantee of approval by the appropriate regional and state agencies and would be relatively expensive if allowed.

B-12

Comment: The DEIR identifies the following adverse impacts associated with access from Longview Dr.:

- destruction of a 30' wide corridor in the riparian zone
- dividing the oak woodland savanna, thereby disrupting the foraging area
- interference with the existing trails and possible safety hazards
- the impact of flooding on the access bridge and road.

In light of these impacts, as well as the potential adverse impacts to the riparian zone of oak woodlands during construction, alternative access routes which avoid these areas must be considered. The final EIR must include a substantive review of access from Fulton Ave., Business 80 and Watt Ave. (Nancy Lindsay)

Response: The comment notes that any access road from Longview Drive would have significant effects on the environment. These effects have been described in detail in the DEIR and in this FEIR.

By considering a Fulton Avenue access and Business 80 access infeasible, the EIR is essentially concluding that the Longview access is the only feasible alternative if the sports complex is to be located on the proposed site. If a Longview Drive access route is not approved, the sports complex could not be built on that site.

Given the significant impacts that have been identified, CEQA allows the City to either approve an access road from Longview Drive and make the necessary findings of infeasibility, or to disapprove the road and the sports complex based on the identified environmental impacts (see CEQA Guidelines Section 15091).

B-13

Comment: The Longview Dr. access route includes a bridge over Arcade Creek. Although the bridge will have adverse environmental impacts, the DEIR does not specifically address these impacts as they are related to the access bridge. Instead, the access bridge is presented as a foregone conclusion. This is due to the fact that alternatives to the Longview Dr. access route are not considered. The Final EIR must specifically assess the access bridge and the no access bridge alternatives and include the conclusion. (Nancy Lindsay)

Response: The reasons for not giving further consideration to alternative access roads are discussed in Response to Comments B-5 and B-11.

None of the proposed access roads (A, B, or C) is feasible without a creek crossing. The impacts of the bridge on vegetation and wildlife would be similar to those described for the access roads (i.e., removal of riparian vegetation). In addition, the impacts of the bridge on flooding and water quality are described in Section G, Water Quality, Drainage, and Flooding of the DEIR.

B-14

Comment: Although the DEIR presented alternative sports complex, parking lot and access route configurations, it did not adequately address the specific or interactive impacts of the three components. (Nancy Lindsay)

Response: See Section 2, Key Revisions of this FEIR.

B-15

Comment: The EIR must disaggregate discussion of the lots, fields, and roads so the best road can be matched with the best lot and these two elements can then be matched with the best field design. Moreover, the city must fully document why the access road from Fulton Avenue was eliminated from analysis (see page 13 of the EIR). (Tim Vendlinski for ACRP)

Response: For discussion of the impacts of the parking lot alternatives, see Section 2, Key Revisions of this FEIR. For discussion of Fulton Avenue access, see response to Comment B-5.

B-16

Comment: Problems related to failure of Jones & Stokes Associates to incorporate valid comments and data generated by

the Notice of Preparation Hearing (Oct. 8, 1984) into the Draft EIR. (Steve Talley for ACRP)

Response: See discussion in Section 1, Introduction and Section 2, Key Revisions of this FEIR.

B-17

Comment: Prior to the Notice of Preparation Hearing on Oct. 8, 1984 the Arcade Creek Restoration Project presented Parks and Community Services with more than sufficient data to document why implementation of the Del Paso Park Master Plan required environmentally sensitive facility placement and innovative mitigation for unavoidable adverse impacts. Parks and Community Services did not present environmentally sensitive proposals as a preferred plan or even a desirable alternative during the NOP Hearing on Oct. 8 or during the Draft EIR hearing on Nov. 14, 1984. These actions have led to a public relations problem between Parks and Community Services and the Arcade Creek Restoration Project and, we believe, the rest of the Sacramento environmental community. Recalcitrance to submit environmentally sensitive development proposals is at the bottom of many of the more serious negative comments we are compelled to submit on this Draft EIR. (Steve Talley for ACRP)

Response: Comment noted. The City and its consultant carefully reviewed and considered all of the NOP comments, and are well aware of the need to develop environmentally sensitive mitigation measures.

B-18

Comment: Problem 1, Poor Alternative Plans: See Appendix 1, comments for Section B of the EIR, specifically Exhibits B-4 and B-5 (page ____ of this correspondence). (Steve Talley for ACRP)

Response: See Section 2, Key Revisions of this FEIR.

B-19

Comment: Problem 2a. Failure to Incorporate NOP Comments: See Appendix 2 for resubmission of comments which have not been addressed, or are poorly addressed in the Draft EIR. (Steve Talley for ACRP)

Response: See response to Comment B-17.

B-20

Comment: Section B, PROJECT DESCRIPTION, Proposed Improvements, Designated Natural Habitat Area. See comment above. If "Designated Natural Habitat Area" is to be listed as an improvement shouldn't we also mention that the entire 246 acre area covered in the Master Plan is functional natural habitat today? Even a casual examination of the 63 acres of natural habitat the Master Plan "finds" is an insult to the intelligence of persons with even a very basic knowledge of field biology. The "added" areas are but scraps of rare ecosystems which were either in areas too small, too inaccessible, or too inconvenient to development, or where development would be impossible. The proposed improvements listed in this section are a natural habitat and open space disaster for the City of Sacramento. (Steve Talley for ACRP)

Response: See response to Comment A-6.

B-21

Comment: Anticipated Usage and Benefits. Revenue comments alluded to at the bottom of the page should be revised considering Parks and Community Services Director Robert Thomas' comment on Nov. 21, 1984 that the athletic complex would be unlikely to "break even" financially. He cited annual deficits of \$80,000 for the Elk Grove facility. (Steve Talley for ACRP)

Response: See errata to page 8.

B-22

Comment: Sports Complex Alternatives. Alternatives 1, 2, and 3 should be revised as per accurate and, hopefully, environmentally sensitive drawings from Parks and Community Services. (Steve Talley for ACRP)

Response: See Section 2, Key Revisions of this FEIR.

B-23

Comment: Access Route Alternatives Ibid. (Steve Talley for ACRP)

Response: See Section 2, Key Revisions of this FEIR.

B-24

Comment: EXHIBIT B-4, B-5. These two figures need to be substantially upgraded. EXHIBIT B-4 softball fields should be offset such that the athletic complex is south of the vernal

pool area. This could also be accomplished by eliminating field #1, thus, returning to the type of configuration (but with much more sensitive placement) shown in EXHIBIT B-2 (p. 5). Alt. 2 would have considerable overflow parking. The paved parking area should probably be reduced to 400 cars to preserve open space and save money. Even with ample overflow parking there would be room for a lighted soccer field southwest of the softball fields if a 500 ft plus width is created between Haggins Oaks Golf Course and Business 80 by the relatively easy relocation of the fairway for hole #13 into a 400 ft. wide swath of unirrigated rough. The best place for a soccer field would be behind the Auburn Blvd.-Business 80 onramp as this would be well away from freeway noise and pollution. The positioning of natural habitat features on EXHIBIT B-4 is deplorably bad and must be corrected. The access route must be updated to the city's current topographically precise maps of the area east of the Sacramento Horsemen's Association. (Steve Talley for ACRP)

Response: See Section 2, Key Revisions of this FEIR. See also, response to Comment B-8 regarding the elimination of the soccer field.

B-25

Comment: EXHIBIT B-5 (Alt. 3) should also receive accurate updates respecting position of the access route (the Nov. 21, 1984 route should be used) and natural habitat features. This plan could be made more environmentally sensitive by moving the parking lot to the south of the fields and running the access route parallel to the Business 80 right of way. Alternatively two 200 car lots could be put at either end. In either case there is sufficient space for overflow parking at the southwest end of the complex. City staff should seriously try to upgrade the quality of this plan as along these guidelines. The only real disadvantage is that space for a soccer field would not be available. (Steve Talley for ACRP)

Response: The maps of the alternatives have been revised (see Section 2, Key Revisions of this FEIR). In arriving at a final design for the sports complex, the City will consider the suggestion of providing two smaller parking lots rather than one large one.

B-26

Comment: IMPACT AND MITIGATION SUMMARY TABLE, Project Description, Proposed Improvements. A separate category should be created for parking lots. The Day Use Recreation Area and Neighborhood Parks should also be treated separately. Together these developments would consume 19 acres of natural habitat within Del Paso Regional Park. They rank in significance of impacts with the athletic complex. The EIR summary table should

clearly indicate this. The descriptions for the various project components will need to be updated to reflect the City's current plans. (Steve Talley for ACRP)

Response: See Section 2, Key Revisions of this FEIR. The vegetation and wildlife summary discusses the impacts of the parking lots.

B-27

Comment: Need for Project. The City of Sacramento must define a need for the developments proposed for Del Paso Park east of Watt Ave. No need is listed in the summary table. (Steve Talley for ACRP)

Response: The City of Sacramento 1984 Park Master Plan designates Del Paso Park as a priority area for development of community park facilities. Based on surrounding populations and lack of adequate existing facilities. Priorities in the Master Plan were based on a year-long study and involved input from individuals and community groups.

B-28

Comment: Access Routes A, B, C. These need to be updated to the new design criteria. Access route A would bisect the Arcade Creek terrace and thereby destroy the ecological integrity of this "core area" of natural assets. This is a significant adverse impact for which no mitigation would be possible except to change the route to plan B or C. (Steve Talley for ACRP)

Response: See Section 2, Key Revisions of this FEIR.

B-29

Comment: Access Route B should be revised to conform to the design presented by the city at the Draft EIR Hearing. (Steve Talley for ACRP)

Response: Comment noted. The access road design (overlay) presented at the hearing on the DEIR is being actively considered by the City. That design need not be included in the EIR, however, since it must be further refined based on environmental and safety factors.

B-30

Comment: Access Route C should be revised to conform with the alignment set forth on Nov. 21, 1984 by Parks and Community Services. If the route goes west of the large heritage blue oak

near Watt Ave. it will impact a significant oak reproduction area. This impact is potentially significant. Mitigation is to go behind the tree but this will require very innovative planning. The critical factor is the loss of ecological integrity on the terrace if the road goes west of the terrace. (Steve Talley for ACRP)

Response: See response to Comment B-29.

B-31

Comment: Sports Complex-1. Without provision for overflow parking and with placement of the parking lot within the core natural area of Del Paso Park destruction of neighboring ecosystems is inevitable. Impact would be significant and adverse. No mitigation would be possible except to change the project to one of the alternatives. (Steve Talley for ACRP)

Response: The impacts relating to this parking lot location have been described and identified as significant in Section 2, Key Revisions of this FEIR.

B-32

Comment: State policy, as established by the California Environmental Quality Act (CEQA), precludes approval of a proposed project if there are feasible alternatives or feasible mitigation measures available which would lessen the environmental effects of the project. CEQA also requires that an environmental report must contain comments obtained as a result of consultation and states that comments obtained from reasonable experts cannot simply be ignored but must be addressed with a good faith reasonable response. CEQA further requires that a new report must be drafted if new information is known. (Steven Cates for the Environmental Council of Sacramento [ECOS])

Response: The comments submitted by Steven Talley and Tim Vendlinski have been considered in preparing the EIR. Both their comments on the NOP and on the DEIR have been reviewed and discussed extensively by City staff and the consultant. Many of their suggestions have been included in the report.

Specifically, the City is aware of the "mitigation plan" submitted by Dr. Talley and Mr. Vendlinski on behalf of the Arcade Creek Restoration Project and will consider all aspects of that plan in its preparation of a recommended sports complex and park implementation plan.

B-33

Comment: Steven Talley, Ph.D. and Tim Vendlinski from the Arcade Creek Restoration Project (ACRP) are qualified experts

within the meaning of CEQA. Their proposed alternative, comments and mitigation measures are documented in their correspondence with the Department of Parks and Community Development which is also included as an attachment to the November 19, 1984 staff report to you. In addition to these very detailed comments, experts from the California Native Plant Society, Audubon Society, Sierra Club and ECOS have presented supporting and supplemental information to the Department. (Steven Cates for ECOS)

Response: See response to Comment B-32.

B-34

Comment: These comments must be responded to. They simply cannot be ignored. The proposed project, if implemented, will cause irreversible environmental harm. The alternatives and mitigation measures presented by the ACRP and other qualified experts would reduce the environmental damage caused by the project as proposed. The Environmental Council of Sacramento is opposed to the three alternatives proposed in the Draft EIR and instead supports, in concept, the alternative proposed by the ACRP. (Steven Cates for ECOS)

Response: See response to Comment B-32.

B-35

Comment: In our review of the draft EIR, we were discouraged to see such a long discussion of how one of the projects would be financed and sustained, and no discussion of how the other projects were to be financed. We would like to see equal attention paid to the means by which each of the proposed projects is to be created and maintained. We would especially like to see effort go into plans to finance the mitigation and protective measures that are necessary to justify any of the proposed developments. (Alta Tura for Sacramento Audubon Society)

Response: Initial funding is for the basic components of the Sports Complex, nature trail, and picnic areas. The City will seek additional grants for development and will pursue funding in the City capital improvement budget process.

B-36

Comment: I am in favor of Access Road 3, but it needs some modifications. The first curve on Access Road 3 lacks good visibility, which could cause many accidents. I propose that the first turn should be slightly re-routed to make it straighter. The blind curve could also be improved by cutting back any obstructing vegetation that lies near the curve. The

use of speed bumps (gentle-sloping type) could help prevent accidents on any of the three access road alternatives. (Douglas Shaw)

Response: The alignment of Access Road 'C' shown on the Project Description map was conceptual only. A precise alignment will be developed based on all of the factors described in this EIR and in the public comments. The final alignment will seek to avoid sensitive resources and maximize public safety.

B-37

Comment: I would urge you to strongly consider relocating the access road so it will not cross Arcade Creek. It would permanently damage an area that is unique in our urban setting. (Stan Oppgard for Sacramento Horsemen's Association)

Response: Other access roads have been reviewed and are considered to be infeasible. See Response to Comments B-5 and B-11.

B-38

Comment: The sports complex conceptual site plan offered by the Sacramento Department of Parks and Community Services would decimate this cluster of natural area values. All but the northwestern fourth of the regenerating terrace oak woodland-savanna would be lost to gain little more than parking space. Heritage oaks would either be left surrounded by parking lots or irrigated lawn both of which are usually fatal. Their reproduction, the heritage oaks of the future, would be bull-dozed away. The vernal pools and their upland blue oak savanna watershed would be lost completely.

Too much is already known about the rarity of riparian oak forest and the absolute rarity of regenerating oak woodland to permit sacrifice of these natural elements to gain parking space when there is ample room for parking in the annual grassland to the southwest of the proposed facility. We strongly urge the Department of Parks and Community Services to abandon the sports complex-1 conceptual site plan. (Steve Talley for ACRP)

Response: Comment noted. No response necessary. The concerns expressed in the comment are being considered in preparing the final design of the project.

Section C: Summary of Findings

(Except for typographical corrections,
all comments are verbatim)

C-1

Comment: Furthermore, the Summary Table uses the same rationale to conclude that Road A will have a "beneficial" impact on oak regeneration areas (see p. 22, 2nd impact). (Nancy Lindsay)

Response: Access Road A impacts are reevaluated in Section 2 of this document in order to consider the impacts of the access road when combined with parking lots other than the one proposed for Sports Complex 1. We agree that the impact of Access Road A on oak regeneration areas in conjunction with the parking lot for Sports Complex 1 should be changed from beneficial to less than significant. This change is included in the revised Summary Table in Section 2, Key Revisions of this FEIR.

C-2

Comment: Misleading Natural Habitat Plan: This section gives one the impression that natural habitat is actually being increased in the park. City Council must be aware that the master plan actually reduces the amount of usable wildlife habitat. All 250 acres in some way now function as wildlife habitat. Construction of parking lots, softball fields, an access road, day use turf area, and neighborhood park will drastically diminish the amount of natural open space still left in this region and adversely impact vegetation and wildlife. (Tim Vendlinski for ACRP)

Response: It was not the City's intention to mislead anyone concerning the impacts of the Master Plan implementation program on the amount of useable wildlife habitat. Implementation of the park Master Plan without mitigation would reduce wildlife habitat. The reference on page 15 is, however, designated natural habitat area which would be increased by Master Plan implementation. See also response to Comment A-6.

C-3

Comment: Section C, SUMMARY OF FINDINGS, Project Description. Again, the project description gives the intolerable

implication that natural habitat is somehow going to fare well under a project that has potentially devastating impacts in store for both natural habitat and open space. If Jones, Stokes, and Associates must adopt some form of the City's terminology it should be done with the clear understanding that the conceptual designs for the athletic complex, day use recreation, and neighborhood park developments will be put in the approximate center of the three remaining open space-natural habitat areas within the boundaries of the existing Master Plan. This placement actually renders the damage to natural habitat and open space much more severe than the actual development acreages would suggest. (Steve Talley for ACRP)

Response: Comment noted. See response to Comments A-6 and C-2.

C-4

Comment: Alternatives. Descriptions of alternatives should be revised to reflect the City of Sacramento's best maps and conceptual plans. (Steve Talley for ACRP)

Response: The best available plan maps are included in Section 2, Key Revisions of this FEIR. A revised description of alternatives is not necessary, as the latest conceptual plans fall within the general description of alternatives found on pages 15 and 16 of the DEIR.

C-5

Comment: Impacts and Mitigation Measures. The Impact and Mitigation Table is long and difficult to understand and this problem will remain even when it is upgraded. This subsection is the best place to put an approximate half page narrative of what each project would do, and whether or not mitigation is possible. (Steve Talley for ACRP)

Response: A brief summary of the significant impacts and feasible mitigation measures relating to vegetation and wildlife for each alternative component of the proposed project is included in Section 2, Key Revisions, of this FEIR.

C-6

Comment: Cumulative Impacts. This section should summarize the real cumulative adverse impact of the Del Paso Master Plan and surrounding commercial developments. These impacts include the loss of natural habitat (particularly for raptors and small mammals) which will derive from construction of the Stanford Home for Children and the athletic complex, parking lot(s), access route, day use recreation area, and neighborhood

park. Irreplaceable loss of the last remnants of lowland oak riparian, terrace, and upland plant communities must also be addressed. These problems should be summarized the summary should not refer to the section in the text where the discussion is found in full! The summary should refer to the full text (as revised) respecting the fact that there is suitable mitigation for these cumulative impacts. (Steve Talley for ACRP)

Response: A revised cumulative impacts discussion is included in Section 2, Key Revisions of this FEIR.

C-7

Comment: Irreversible Environmental Changes. All the facilities are relatively permanent and this section should take note of this fact. (Steve Talley for ACRP)

Response: The errata to the DEIR includes the finding that the sports complex, access road, and parking lot would result in irreversible environmental changes. The neighborhood park and day-use area do not constitute irreversible environmental changes because if these areas were left unmaintained, they could return to natural habitat area.

C-8

Comment: The arguments made against the athletic complex in the DEIR also pertain to the day use recreation area and neighborhood park. (Steve Talley for ACRP)

Response: The day-use area and the neighborhood park are not expected to reduce the long-term value of the site for biological resources in the same manner as the sports complex. These uses are not expected to concentrate large amounts of users, nor will any new access be provided to these areas.

C-9

Comment: Sports Complex-2 would, indeed, prevent destruction of the oak regeneration area. We strenuously object to the use of the term beneficial as the sports complex itself would still have adverse impacts. Significance ratings for oaks respecting athletic complexes 2 & 3 should read: "less than significant." There have been only two "beneficial" suggestions made in the Del Paso Park environmental process that we know of (Steve Talley for ACRP)

Response: Comment noted. The significance levels for impacts on oak regeneration areas by Sports Complexes 2 and 3 have been changed to less than significant. See the revised Summary Table in Section 2, Key Revisions of this document.

C-10

Comment: Sports Complex-2. Large oak trees would be avoided except for the blue oak in the upland savanna. This tree could be saved by innovative planning of the softball complex or going to a three field design. Impact is not "beneficial" it is less than significant. (Steve Talley for ACRP)

Response: The impact on the blue oak has been included in the revised Summary Table in Section 2, Key Revisions of this document. The level of impact has been changed to less than significant. The suggested mitigation for this impact is to shift the orientation of the softball complex to avoid the blue oak.

C-11

Comment: Other Improvements. Large oak trees on the terrace just east of Renfree Field would be retained but they would be removed from their natural community. Impact would be potentially significant but could be mitigated to less than significant with well planned native landscaping in the park itself. (Steve Talley for ACRP)

Response: The revised Summary Table in Section 2, Key Revisions of this FEIR includes the impact on the large oak trees on the terrace east of Renfree Field. This impact is potentially significant. The suggested mitigation measure is to use the techniques for protecting oak trees which are included in Appendix II of the DEIR. Providing well planned native landscaping within the park would not provide mitigation for removing the large oak trees from their natural community.

C-12

Comment: Access Route C. This route would potentially allow disruption of the ecological integrity of the terrace west of Watt Ave. This impact is at least potentially significant. The notes about the large blue oak tree made in the text under this heading could be placed under the heading for impacts on large trees. If the access route goes east of this tree extensive and innovative mitigation measures will be necessary to protect this largest blue oak in the park. (Steve Talley for ACRP)

Response: This impact is included in Section 2, Key Revisions and in the revised Summary Table. The suggested mitigation measure is to move the access road west of the large blue oak tree (completely out of its drip line to avoid directly impacting it).

C-13

Comment: Sports Complex-2. The location would indeed result in less impact than complex one. However, impacts would still be significant because of the area consumed (valuable for raptors and small mammals) for the complex itself. It would be at least potentially significant. Mitigation would be to place the complex as far south as possible. (Steve Talley for ACRP)

Response: These comments are incorporated into the revised Summary Table in Section 2, Key Revisions of this document.

C-14

Comment: Sports Complex-3. Even this complex will remove valuable raptor and small mammal foraging area. Mitigation for this project and Complex-2 is possible and has been outlined in our Nov. 14, 1984 correspondence by S. N. Talley. (Steve Talley for ACRP)

Response: These comments are incorporated into the revised Summary Table in Section 2, Key Revisions of this document.

C-15

Comment: Access Route B. Would pose a danger to wildlife but would probably not be as serious as Route A. Impact: potentially significant. (Steve Talley for ACRP)

Response: The revised Summary Table in Section 2, Key Revisions of this FEIR has been amended to reflect the fact that Access Road B may have a smaller impact on wildlife mortality than Access Road A.

C-16

Comment: There are some inaccuracies in the DEIR, most of which are found on page 22. The third impact of Sports Complex 1 listed under the Vegetation section of the Summary Table should be changed to read: Large oak trees would be retained, but may suffer high mortality even if special precautions are taken. The significance of the third impact of Sports Complex 2 should be changed from Beneficial to Less than Significant because nothing beneficial is being proposed. The third impact of Sports Complex 3 should be changed to read: It appears from the conceptual drawing that this alternative would avoid impacts to the large oak trees.

Response: These changes can be found on the revised Summary Table in Section 2, Key Revisions, of this FEIR.

Section D: Land Use

(Except for typographical corrections,
all comments are verbatim)

D-1

Comment: Reference to the ALUC's overflight zone recommendations on page 19 and 39 of the Draft EIR state that the ALUC's concerns within this zone are mainly noise related. This statement is incorrect. As indicated in my letter of October 2, 1984 to Ms. Barbara Bonebrake on the notice of preparation for the environmental study (copy enclosed), it is "the safety implications of the placement of new facilities within the overflight zone (which) should be addressed in the EIR." The Draft EIR has not addressed the safety issue. (SACOG)

Response: Although the proposed sports complex will be located at McClellan's Overflight Zone, it would not be situated within the approach zone thereby reducing noise exposure and accident potential to a "marginal" level according to the ALUC Guidelines (See Exhibit D-2 in Section 2, Key Revisions). The ALUC Policy Plan does not regulate land uses within the Overflight Zone, but does recommend against developments that allow large concentrations of people within the Overflight Zone (i.e., stadiums, hospitals, or schools). The Policy Plan defines large concentrations of people as a gathering of individuals in an area that would result in an average density of greater than 25 people per acre during a 24-hour period or a single event that would result in the gathering of more than 50 people per acre for a duration of greater than 2 hours. Although the proposed sports complex is not a full-scale stadium, it may meet the ALUC's definition of "large concentrations of people" when fully operational.

D-2

Comment: There is no indication in the Draft EIR that officials at McClellan AFB have been contacted regarding the project or given the opportunity to review the Draft EIR. McClellan officials should be given this opportunity if they have not already. (SACOG)

Response: Comment noted. Officials at McClellan AFB have been given the opportunity to comment on the DEIR.

D-3

Comment: Combine the day use recreation area and neighborhood park: The Del Paso Regional Park Master Plan called for a 13 acre day use recreation area in the oak savanna east of Renfree Field and west of Norris Swale. A 6 acre neighborhood park was planned for the grassland area with oak regeneration east of Norris Swale. ACRP has noted there is sufficient space in the large grassland west of Norris Swale to locate both a neighborhood park and day use recreation area and that adding the 6 acre area east of the swale to natural habitat already designated in the area by the master plan would produce an approximate 45 acre parcel we call the East Del Paso Natural Area (see ACRP's Oct. 4, 1984 correspondence). We are pleased Jones & Stokes Associates recognized both the value of retaining the field east of Norris Swale as natural habitat and the relative ease with which the neighborhood park could be integrated with the day use recreation area in the grassland just east of Renfree Field. We anticipate the city will accept the Draft EIR's recommendation. (Steve Talley for ACRP)

Response: Comment noted. No response necessary. The recommendations are being considered in the final design of the project.

D-4

Comment: Bridging the creek, and also paralleling it, would be undesirable because of loss of wildlife and vegetation on both sides of the creek. (Betty Matyas for CNPS) A dangerous horse-car conflict would be present. (Betty Matyas for CNPS) The traffic figures for the Watt-Longview intersection have been underestimated, and traffic would clog on both streets. (Betty Matyas for CNPS)

Response: Mitigation measures for the horse-car conflict are found on pages 90 and 91 of the DEIR.

D-5

Comment: In summary, we recommend: The neighborhood park be eliminated from its proposed site, and be incorporated into the day-use area, and the softball complex, as suggested on P. 43. (Betty Matyas for CNPS)

Response: Comment noted. No response necessary. The recommendations are being considered in the final design of the project.

D-6

Comment: In summary, we recommend: That lawn, and necessity for irrigation be kept to a minimum, (Betty Matyas for CNPS)

Response: Comment noted. No response necessary. The recommendations are being considered in the final design of the project.

D-7

Comment: In summary, we recommend: That overflow parking be prevented in sensitive areas, (Betty Matyas for CNPS)

Response: Comment noted. The mitigation measure found on page 129 of the DEIR (i.e., Install Barriers to Prevent Parking Along the Access Road), would eliminate the problem of overflow parking in sensitive areas.

D-8

Comment: The Final EIR must contain a base map of the park void of any of the proposed developments to use as a basis for comparison. The DEIR uses an old conceptual design map (including proposed developments) for this purpose. For example, the land use map (p. 34), soils mapping units map (p. 46), vernal pools of oak regeneration map (p. 55) and floodplain map (p. 73) must be plotted on an accurate base map rather than the old conceptual design map. (Nancy Lindsay)

Response: Figures 2-2 and 2-3, in Section 2, Key Revisions of this FEIR, graphically present environmental constraints on topographic maps for the areas being considered for development in the Master Plan Implementation Program.

D-9

Comment: Specific Impacts: As described by Ron Bass of Jones & Stokes, the EIR was intended to evaluate the impacts of the different components separately to enable the city to "mix and match" the components to obtain the optional configuration. However, the 3 components were not addressed separately. Instead, the parking lot component was evaluated as part of the sports complex component, thus it is impossible to use the "mix and match" idea. Since the parking lot has a great deal of potential for adverse impacts, it must be evaluated separately in the final EIR and the conclusions should be added to the summary table (pgs 18-32). (Nancy Lindsay)

Response: A brief summary of the significant impacts and feasible mitigation measures for each alternative component of

the proposed project is included in Section 2, Key Revisions, of this FEIR.

D-10

Comment: In addition, the Final EIR must evaluate the use of "green lot" parking lots as a mitigation measure. Green lots allow infiltration thereby reducing runoff and allowing natural groundwater recharge. In my written comments on the Notice of Preparation I asked the city to evaluate the use of green lots in the DEIR. This request was ignored. (Nancy Lindsay)

Response: Green lots are considered infeasible for use in the sports complex parking lot for several reasons: 1) Both the Chualar sandy loam and the Riolinda sandy loam soils which underlie the parking lots shown in Exhibits B-3, B-4, and B-5 compact easily which would decrease the infiltration rate of water. This would limit the usefulness of a green lot for reducing runoff. The Riolinda sandy loam soil which underlies the parking lots proposed by both B-4 and B-5 would not allow groundwater recharge because it has an impervious hardpan layer (Tugel pers. comm.); 2) there would be a need for additional ongoing maintenance beyond that required for an asphalt parking lot; 3) in a heavy-use area, such as the sports complex parking lot, a green lot would experience considerable damage, requiring greater long-term maintenance and repair.

D-11

Comment: Interactive Impacts: The DEIR does not adequately address the impacts of the individual components of the sports complex, parking lot and access route as they relate to one another. (Nancy Lindsay)

Response: The potential impacts of all of the components of the Master Plan Implementation Program considered together is included in Section 2, Key Revisions of this FEIR under Cumulative Impacts.

D-12

Comment: consistent: due to additional 63 acres of habitat preservation. This is completely false. The master plan falsely states that 63 additional acres of habitat will be preserved. Given that the entire undeveloped area in Del Paso Park is currently functioning as valuable natural habitat, any development of this area will reduce the amount of habitat area, not increase it! Thus, this assessment must be "inconsistent" in the final EIR. (Nancy Lindsay)

Response: The City agrees that the entire undeveloped portion of Del Paso Regional Park is currently functioning as natural habitat. The Assessment of Consistency on page 36 of the DEIR was trying to point out that the Master Plan had set aside an additional 63 acres as designated natural habitat area. The Master Plan designation of additional acreage to be preserved is consistent with county policy to maintain the natural or native environment for low intensity uses designed to ensure long-term protection.

The DEIR also indicated a potential inconsistency related to impacts on the natural areas that would be affected by the project.

D-13

Comment: Potentially inconsistent: due to elimination of oak regeneration and vernal pools in order to build a sports complex. Not only does this violate the policy with respect to protection, it violates the policy with respect to low intensity uses. Clearly, a four field softball complex is not a low-intensity use. Thus, this assessment must be "inconsistent" in the final EIR on two accounts. (Nancy Lindsay)

Response: The City agrees that the sports complex does not qualify as a low-intensity use. The errata to page 36 of the DEIR include a new finding of potentially inconsistent, because the sports complex (high intensity use) would impact the natural or native environment if not properly designed. The Revised Summary Table found in Section 2 of this document also includes this potential inconsistency.

D-14

Comment: 1982 General Plan Policy: "Methods of financing maintenance and operation should be included in the planning and implementation process." The DEIR assesses the project as being consistent with this policy due to fund-raising by the Jaycees and a state grant application. Unfortunately, the City has only pursued funding for the sports complex and has not pursued funding for any of the other proposed improvements. Thus an additional assessment of "inconsistent" with respect to the DURA, Neighborhood Park, Natural Habitat restoration and the Renfree Field Parking Lot must be included in the final EIR. Furthermore, I have heard rumor that the Jaycee's have withdrawn their plans to fund-raise for the sports complex. If so, what has happened to the \$5,000 seed money granted to the Jaycee's by the city council in March, 1983, which was to be used for their sports complex fund-raising effort? (Nancy Lindsay)

Response: The City is pursuing funding for a picnic area and an interpretive trail through the same state grant as the

sports complex funding is being pursued. Other improvements will be funded as money becomes available through other grants and the city capital improvement budget process. As far as the City knows, the Jaycees still plan to be involved in fund raising for the sports complex.

D-15

Comment: The DEIR assesses the project as being consistent with this policy since the City and County are working together to develop the softball complex. The DEIR fails to assess consistency with respect to the other proposed improvements. To fully capitalize on increasing the diversity of recreational opportunities, the City should be working with the Junior Museum and Science Center to incorporate the educational values of the oak woodland, riparian habitat and vernal pools with the Jr. Museum's program, and the Effie Yeaw Center at Hoffman Park to explore the possibility of constructing an interpretive trail at Del Paso Park similar to that at Effie Yeaw. Thus, an additional assessment of "inconsistent" must be included in the final EIR. (Nancy Lindsay)

Response: This policy encourages the development of recreational facilities which will maximize the diversity of recreational opportunities. The combination of the proposed day-use area, neighborhood park, interpretive trail, picnic area, and sports complex is consistent with this policy.

D-16

Comment: 1984 Master Plan Policy: "Allow revenue-producing facilities such as a sports complex to help finance other park operating expenses on the same site." The DEIR says the project is consistent with this policy since additional revenues from the sports complex could be used to finance other on-site expenses. Does the City really expect the sports complex to generate enough revenue to finance other expenses? If so, a policy specifically stating that X% of the profit will be used for development of the other improvements in the park must be incorporated into the final plans for the sports complex, otherwise, the assessment of this policy must be "potentially inconsistent". (Nancy Lindsay)

Response: The City does not expect the sports complex to generate revenues in the first few years of operation, so no firm commitment of funds is being made at this time. Any revenue generated by the sports complex will be allocated by the City Council in the budget process in the future.

D-17

Comment: 1984 Master Plan Policy: "Aggressively seek state, federal, and local grants to improve city recreation services". The DEIR says the project is consistent with this policy, however, the city has only pursued grants for the sports complex. Thus, an additional assessment of "inconsistent" with respect to the other proposed improvements must be included in the final EIR. (Nancy Lindsay)

Response: The grant application to the California Department of Parks and Recreation includes a request for funding of a picnic area and an interpretive trail in addition to sports complex funding. Based on the reasons listed above, we feel that the other proposed improvements would also be consistent with the stated funding policy.

D-18

Comment: In addition to the policies considered in the DEIR, there are numerous City and County policies regarding the protection of open space, flood plains, natural drainage areas, natural streams and native environment which the final EIR must address. Please refer to the publication entitled "Agriculture & Open Space Prepared for Workshop V of the Joint City-County Urban Development Task Force" dated November 19, 1984 for a detailed discussion of these policies. (Nancy Lindsay)

Response: The paper on agriculture and open space is merely a compilation of existing data, policies and plans of the City and County. The park planning policies in the City General Plan, County General Plan, and City Parks Master Plan are summarized. Many of these are the same policies found in Exhibit D-3 in the DEIR.

For a discussion of the County natural stream policy, see response to Comment D-33.

Finally, although each alternative may result in a portion of the sports complex, parking lot, or access road being in the floodplain, parks (including improved parks) are considered to be acceptable uses in floodplains.

Any recommended policies eventually adopted by the City or County as a result of the joint task force study would not affect consideration of the project at this time.

D-19

Comment: We are particularly concerned with the proposed access roads (Plan B-3 for Road A, Plan B-4 for Road B and Plan

B-5 for Road C), for, although all plans would have an adverse impact upon the environment, Road B of Plan B-4 would have the greatest impact upon the environment, the Sacramento Horsemen's Association facility and horsemen using the bridle trail on each side of Arcade Creek. (John Jones for Sacramento Horsemen's Association)

Response: Comment noted. No response necessary.

D-20

Comment: Full parking lots may result in parking on the SHA facility, especially the barn area. Road B will, at the Longview Drive entrance, come within thirty (30) feet of the main SHA parking lot on Longview Drive. Where the bridge crosses the creek is more open land that isn't used for parking, but people could park on it. It is even closer to the sports complex than the Longview Drive parking lot. Here lies the problem. Frequently, we find people parked in handicapped parking spaces. Why? Because it is closer to where they want to be. This suggests that some people have little consideration for where they park. If people park on the SHA facility it will necessitate our employees playing "policeman." If the violator happens to get his vehicle parked without being seen, SHA will be forced to have the vehicle towed or to call the police. The end result may be friction between users of the sports complex and SHA. That we wish to avoid. Our employees have enough to do without this problem. (John Jones for Sacramento Horsemen's Association)

Response: Comment noted. The post and cable barriers suggested as a mitigation measure on page 129 of the DEIR would prevent off-road parking in the area of the Sacramento Horsemen's Association. The problem of sports complex users parking in the barn area of the Sacramento Horsemen's Association facility would be difficult to regulate if the bridge proposed by Access Road B is implemented. The Access Road B bridge would provide easy access from the Sacramento Horsemen's Association facility to the proposed sports complex. A mitigation measure (which is included in the Errata to the DEIR for page 130) would be to require rigorous police enforcement of illegal parking in the area of the Sacramento Horsemen's Association facility.

D-21

Comment: The sports complex will draw bike and foot traffic. Traffic on Road B will pass within twenty feet of the SHA facility for approximately three-quarters of the east property line.

In the past, the creek has acted as a natural barrier from people entering the facility from the south side. The bridge over the creek will serve as a natural path from the complex to the SHA facility for the unsupervised children who are brought to the complex with their father, mother, sister or brother who are playing thereto. Children coming into the complex on Road B will see the horses at the SHA facility and, since children are naturally attracted to horses, will return across that bridge to the horses. Children raised around horses do some pretty stupid and dangerous things putting their life at risk, so you can imagine what a child who isn't familiar with horses might do. A thousand pound horse can do tremendous damage to a child. We have many accounts of even the gentlest of horses maiming or killing people, even its owner. They rarely do damage out of viciousness, but instead out of fear. We don't wish a child to become injured, and we certainly don't want a child to be killed. There is also always the risk of a lawsuit should either happen. Conversely, we do not want a child to inadvertently cause injury to one of the horses.

The farther away from the horse facility the road, the less potential there will be for trespassing. (John Jones for SHA)

Response: It is unlikely that unsupervised children from the sports complex will wander to the Sacramento Horsemen's Association facility because the sports complex area will be entirely fenced. Neighborhood children may, however, be attracted to the Sacramento Horsemen's Association facility because of the new access provided to the area. The errata to page 42 of the DEIR includes this possible impact. A possible mitigation measure, which is included in the errata to page 44 of the DEIR, would be to build a wooden fence or plant a fast-growing native hedge along Access Road B to act as a visual barrier between the access road and the Sacramento Horsemen's Association facility.

D-22

Comment: The EIR admits that the present plans will produce hazards for horse traffic. The report estimates that the complex will receive 450-500 vehicles during a four hour evening of play. It also tells us that each weekend day will experience twelve hours of play. Quick division and multiplication tells us that there will be 1350 to 1500 vehicles during that 12 hour period, based upon the study's figures. Further, the ball fields will have a different game every hour. This tells us that there will not only be heavy traffic on any access road, but there will be frequent traffic. Here lies the conflict. The heaviest horse use is also during weekends.

Crossing roads with a horse is, at best, a tricky maneuver. The solution is to traffic the horses under the bridge crossings, but a survey of the land where the bridge crosses the

creek at Road B will tell even the most casual observer that when the altitude of the trail and the approach for the bridge are nearly the same, the bridge will not reach the needed height (12' to 15') for safe passage.

A solution here might be to build a longer bridge to compensate for the gradual drop of the land on the north side of Road B's location. That might work if one began far enough back (probably at the south end of the small arena). One must remember that the longer the bridge, the greater the cost. Another solution might be to build up the approach to the bridge with earth, which would probably be less costly than the longer bridge portion. This I believe would work on the north side, although, it would encroach upon even more of the SHA facility than is presently being done due to the required broad base. The south side would be a different story. The land on that side is only slightly lower than the north and therefore would require the same raised approach. Since raised approaches built up by soil require a wide base than a bridge on piers, you would be destroying more of the vegetation than had been previously envisioned. Further, these raised earth approaches will act as dams and will probably experience erosion.

Still another suggested solution is an arched bridge. Given the gradual drop on both sides and the relative short span of the bridge, I believe an engineer would tell you that there would be too rapid a rise to gain the needed height for horse passage at the trail. Again, the bridge would have to be longer or approaches would have to be built; the same disadvantages would be met. (John Jones for SHA)

Response: Comment noted. Since the bridge is not yet designed, it is unknown at this time whether or not it will be feasible from an engineering standpoint to route the bridle trails under each of the three proposed bridges. Some of the bridge alternatives may allow for bridle trail undercrossings which are only passable during certain times of the year. Mitigation measures to be implemented if bridge undercrossings are infeasible include signing horse crossings and using volunteer crossing guards. These measures are discussed on pages 43, 44, 90, and 91 of the DEIR.

D-23

Comment: At the point where Road A would cross, there is a natural and rapid drop to the trail and creek. The trail on both sides is at least fifteen (15) feet below Longview Drive, providing the clearance necessary for safe passage of horse and rider under the bridge. (John Jones for SHA)

Response: Comment noted. No response necessary.

D-24

Comment: On November 21st members of the Department of Parks and Community Services proposed an alternative to those access roads listed in Jones & Stokes Associates, Inc.'s Environmental Impact Report. The proposal is similar to Road C of the EIR, but doesn't cross at the same place. The spot chosen for this crossing does not provide enough bridge height on the south side of the creek for safe horseman passage under the bridge. Passage under the bridge on the north side is questionable. Again, passage over any road increases hazards for both horse and rider. (John Jones for SHA)

Response: Comment noted. See response to Comment D-22.

D-25

Comment: Recently the city increased SHA's lease (\$100 to \$450). Increase in the lease has placed a greater demand upon SHA for gaining revenue from the facility through increases in dues, fundraisers and rentals. An access road through the SHA facility will have a direct impact upon this potential.

Rental of the clubhouse comprises a significant percentage of our revenue. Access Road B will come within sixty (60) feet of the clubhouse and even closer to the back lawn and barbecue area. One of the primarily rentals is from weddings and receptions. The back lawn and barbecue area is used in nearly all of these occasions, due to its beauty and rural atmosphere. To have a road with as much traffic as will be continually passing over it, as close as it will be to the clubhouse on weekends, will be to diminish the desirability for such activities, resulting in a decrease in revenue.

Road B will come within ten (10) feet of our small arena. This arena is used for a variety of activities, including horse shows. Heavy traffic this close to an arena will eliminate its use for shows. Again a loss of revenue.

The city has asked SHA to put into the facility a certain amount of capital investment, which translates into added expenditure above our cost of maintenance. One of those capital investments is to be the expansion of the small arena and covering it. We had hoped this might encourage horse shows during the rainy season, bringing us needed revenue. The close proximity of Road B will eliminate this potential.

Road B goes through the small exercise arena, therefore, eliminating this arena. There is no direct revenue gained off this arena, but it is one of the things that draws membership and barn renters.

A road through SHA increasing noise, light, and hazards and decreasing its aesthetic value will reduce membership, therefore, reducing revenue. (John Jones for SHA)

Response: Comment noted. These impacts are included in the Errata to the DEIR for page 42. Mitigation for these impacts is found in the Errata to the DEIR for page 44. Redesigning Access Road B to avoid the SHA facility would be the only method for completely mitigating these impacts.

D-26

Comment: In the final analysis SHA does not support the building of a sports complex on such sensitive land. We hope that Sacramento City will identify areas worth preserving in its natural state before it is all built upon or paved. SHA believes Del Paso Park to be such an area. (John Jones for SHA)

Response: Comment noted. No response necessary.

D-27

Comment: Creek Crossings: "The bridge crossing Arcade Creek in this location (Bridge Road) is the only one in the park" (p. 35). This sentence is misleading and understates the tremendous impact that the Interstate 80 and Watt Avenue bridges have on the park. These bridges may not technically be in the park, but they have greatly upset the park's riparian/oak woodland ecosystem since they not only cross the creek, but also functionally and aesthetically separate the park. (Tim Vendlinski for ACRP)

Response: Comment noted. The Errata to the DEIR amends the above-mentioned sentence to "A bridge crosses Arcade Creek in this area."

D-28

Comment: Off-Road Vehicles: "No motorized vehicles are permitted on the bridle trails" (p. 35). To my knowledge the city has no official law against off road vehicles within the park. If such a law exists, why isn't it enforced? Each season new trails are plowed out of regenerating oak woodland by irresponsible off-road vehicle operators. Clearly, a comprehensive post and cable system surrounding the entire park would prevent off road vehicle abuse. Such a solution was part of the conceptual master plan, but the EIR totally neglects to discuss the benefits of this comprehensive barrier system. Moreover, the Department of Parks and Community Services has left it to the citizens to finance this park component. We urge city officials to seek funds for the post and cable system with the same

enthusiasm they demonstrated in the search for softball complex funding. If citizens weren't so busy fending off environmentally insensitive park development plans, we could have probably secured money from the Proposition 18 Parks Bond. Discuss, in detail, methods to fund and construct a comprehensive post and cable barrier system. (Tim Vendlinski for ACRP)

Response: City Code (Section 27.50) prohibits the use of motorized vehicles in parks other than on streets, parking lots, or other paved areas with the exception of maintenance vehicles. The lack of enforcement may be due to limited police resources in the Del Paso Regional Park area.

Methods of funding construction of a comprehensive post and cable barrier system include: 1) obtaining financing from the City general fund during the budget process, and 2) pursuing grants (there may be some available for wildlife protection).

D-29

Comment: Master Plan Inconsistency With Existing Land Use Policies: The EIR does a fine job of explaining how developing a softball complex in Del Paso Regional Park would directly and indirectly impact "oak regeneration areas, large oak trees, vernal pools, and riparian vegetation (and) would be inconsistent with both city and county policies." While the County's 1982 General Plan policy calls for the long-term protection of natural environments by allowing only low-intensity uses in natural areas, the city's own 1984 City Master Plan for Park Facilities and Recreation Services goes a step further by mandating the identification and acquisition of natural areas to promote public visitation, recreation, and education. However, in view of the need for softball facilities in the Sacramento community, ACRP accepted the concept of developing a softball complex only if it is designed with major emphasis upon protecting environmental values.

We believe the city could overcome this blatant inconsistency with both city and county policies only if park development is linked to an innovative mitigation package to preserve and enhance wildlife, plant, and aesthetic values throughout the park. (Tim Vendlinski for ACRP)

Response: Comment noted. No response necessary.

D-30

Comment: Since the beginning of October, ACRP has proposed specific ways to not only mitigate for the destruction of priceless wildlife habitat, but also provide Sacramento with a first class and highly aesthetic softball facility serving amateur softball teams throughout America. We used our own resources

combined with topographic maps furnished by the city to design precise access routes and facility boundaries to limit the project's environmental impact on the integrity of the existing riparian/oak savanna/vernal pool ecosystem west of Watt Avenue. We have also stressed the importance of preserving the regenerating oak savanna north of Longview Drive and east of Norris Swale to provide permanent refuge for the park's wildlife displaced by development. Once the rest of the park is developed, and the remaining open space outside Del Paso is consumed by urban development, the park's preserved riparian corridor and regenerating oak habitat will be one of the few areas on the entire Central Valley floor where one can study an example of California's small stream/oak woodland community. (Tim Vendlinski for ACRP)

Response: Comment noted. The suggestions for mitigation of sports complex impacts that have been made by ACRP have been helpful to ensure that the sports complex is designed in an environmentally sensitive way and are being considered further in formulating a final design for the project.

D-31

Comment: There is no need to discuss the adverse environmental impact the city's proposals would create; these negative impacts are discussed in detail in the ACRP letters addressed to the city's environmental assessment team on October 4, 1984; October 15, 1984; and November 14, 1984. Unfortunately, our proposals were largely ignored in an apparently flawed public input process. The EIR touched upon the mitigation idea by recommending the combination of day-use area and neighborhood park upon the 13 acre creek terrace (see below) to preserve the regenerating oak woodland east of Norris Swale. (Tim Vendlinski for ACRP)

Response: Comment noted. The purpose of the EIR is to discuss the potential impacts of implementation of each of the conceptual designs proposed by the City. The proposals by the ACRP were not ignored, but have in fact been considered by the City in the design process. The EIR does not deal with the level of specificity required in the final design process and many of the ACRP's comments have dealt with refinements of the City's conceptual plans.

D-32

Comment: Combine Day-Use Area and Neighborhood Park: Combine the day-use recreation area and neighborhood park and develop on the 13 acre creek terrace between Renfree Field and Norris Swale. This park component should be an extension of the turf area bordering Renfree Field. Add the area east of Norris Swale to the permanently protected natural habitat area along

the creek to create the East Del Paso Natural Area. Refer to the map contained in the October 4, 1984 correspondence. This element was recommended to the city by Jones & Stokes Associates' environmental assessment team on page 43 of the EIR. (Tim Vendlinski for ACRP)

Response: The combination of the day-use area and the neighborhood park was suggested on page 43 of the DEIR as a mitigation measure to minimize the impacts on the eastside oak regeneration area. This would be consistent with County policy of maintaining the natural or native environment for low-intensity uses designed to ensure long-term protection. It would also be consistent with City policy of acquiring sites containing significant native plant communities or examples of ecological relationships to make the area available for public visitation, education, and recreational use.

D-33

Comment: Natural Streams Policy: Summarize the county's Natural Streams Policy (since much of Arcade Creek is covered by this policy) and explain whether or not the proposed project is consistent with the goals and objectives of the ordinance. (Tim Vendlinski for ACRP)

Response: The proposed project is within the City of Sacramento, so the portion of Arcade Creek in Del Paso Regional Park is not designated as a natural stream according to Sacramento County Zoning Code (Sacramento County Zoning Code 235-161).

The Natural Streams Combining Land Use Zone (Sacramento County Zoning Code 235-160) is designed to regulate land uses along designated streams in the following ways:

- a) Protect current and future occupants of land subject to flooding from the physical damage of flooding.
- b) Prevent noncompatible development in floodprone areas.
- c) Protect and preserve the natural character and amenities of the Natural Streams.
- d) Minimize the placement of fill in floodplain areas of Natural Streams.
- e) Protect and enhance the quality of water entering and flowing within Natural Streams.
- f) Preserve the recreation potential of Natural Streams.

The proposed project is consistent with the goals and objectives of the ordinance in the following ways:

- a) No damage is expected to be incurred by the projected related improvements due to flooding.
- b) Park development is generally considered a compatible use on floodplains. The only development that would be

within the 100-year floodplain would be part of Sports Complex 1, the Alternative 1 parking lot, and parts of Access Roads A, B, and C.

- c) The natural amenities and character of Arcade Creek will be impacted by the proposed bridge and access road, but there are already several stream crossings along this stretch of Arcade Creek.
- d) The only alternative which would involve fill in the 100-year floodplain is Sports Complex 1. The bridges may partially obstruct creek flow.
- e) The project is not expected to impact the water quality of Arcade Creek. The City has contacted the Regional Water Quality Control Board regarding existing problems.
- f) The recreation potential of Arcade Creek is not expected to be diminished by project implementation.

D-34

Comment: Interpretive Services: Determine usage and activity levels at similar urban natural areas with existing interpretive facilities and discuss the potential for developing quality interpretive programs along the "Arcade Creek Parkway". The Sacramento Science Center and Junior Museum is now located at the heart of Del Paso Regional Park and is an ideal anchor for such educational/recreational projects. An excellent model program is that of the Effie Yeaw Interpretive Center and 85 acre Natural Area within the American River Parkway. (Tim Vendlinski for ACRP)

Response: The Effie Yeaw Interpretive Center receives approximately 30,000 visitors per year. The Interpretive Center receives drop-in visitors as well as school tours, other tours, outreach programs, and nature walks. The number of persons who show up for the weekend nature walks is variable (from 0-55) and depends on publicity, weather, and other events occurring at the same time in the Sacramento area. Part of the success of the Effie Yeaw programs may be due to the fact that they do not charge a fee (Stevens pers. comm.)

The Sacramento Science Center and Junior Museum is a non-profit organization which is located in Del Paso Regional Park. The potential exists for developing interpretive programs along Arcade Creek in conjunction with the Sacramento Science Center and Junior Museum.

D-35

Comment: 1984 City Master Plan for Park Facilities and Recreation Services

New Revenues for Natural Open Space Management: The EIR suggests that the sports complex would be consistent with the

city's policy of allowing "revenue-producing facilities such as the sports complex to help finance other park operating expenses on the same site." This argument is based on the assumption that the city will spend additional revenues from the sports complex, over operating costs, to finance other onsite park components. ACRP urges the City Council to order Parks and Community Services to spend 5-10 percent of the net profits from the sports complex to restore and preserve the park's unique natural features. Parks and Community Services claims they won't have enough money left over to fund the Post & Cable system and habitat restoration. If this is true, ACRP suggests the city is once again in violation of its own policy. Explain how the city can use net revenues to restore and preserve the park's natural open space. (Tim Vendlinski for ACRP)

Response: The City does not expect the sports complex to generate revenues in the first few years of operation, so no firm commitment of funds is being made at this time. Any revenue generated by the sports complex will be allocated by the City Council in the budget process. At the time that sports complex revenues are generated, ACRP could again urge the City Council to allocate funds to restore the park's unique natural features.

The Department of Parks and Community Services may not be able to fund the post and cable barrier system with funds generated by the sports complex if the sports complex does not generate funds. This lack of funds from the sports complex development would not put the City in violation of its own policy. The City Council can designate any revenues generated by the sports complex to restore and preserve the park's natural open space. This could include financing installation of a comprehensive post and cable barrier system to protect sensitive areas.

D-36

Comment: Install Barriers to Prevent Motorized Vehicle Use of the Bridle Trails: ACRP applauds Jones & Stokes Associates' recommendation to install barriers to prevent the abuse of the bridle trails by off-road vehicles. ACRP urges the city to order Parks and Community Services to install a comprehensive post & cable barrier system immediately. (Tim Vendlinski for ACRP)

Response: Comment noted. No response necessary.

D-37

Comment: IMPACT AND SUMMARY TABLE, Land Use, Consistency with Land Use Policies. The Arcade Creek Restoration Project mitigation package as summarized in our Nov. 14, 1984

correspondence would provide mitigation for a sensitively placed athletic complex and combined day use recreation and neighborhood park. Admittedly the Plan 1 layout and separate day use recreation and neighborhood parks would be destructive beyond feasible mitigation. (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

D-38

Comment: IMPACT SUMMARY TABLE, Land Use Conflicts, Impact, Sports Complex. The impact of noise upon golfers is mentioned. What about the noise from the complex 1 parking lot disturbing nature area users along the creek or in what little would remain of the terrace oak woodland-savanna under this plan? (Steve Talley for ACRP)

Response: Comment noted. See Section 2, Key Revisions for the Revised Summary Table which includes this impact. The errata to page 38 of the DEIR also incorporate the potential impact of noise from the sports complex disturbing natural area users along the creek. A possible mitigation measure, which is included in the errata to page 44 of the DEIR, would be to locate the sports complex as far as possible from the creek.

D-39

Comment: IMPACT SUMMARY TABLE, Land Use Conflicts, Impact, Other Improvements. Positioning the neighborhood park within the terrace east of Norris Swale would do more than destroy oak reproduction. Developing the six acres within the twelve acre terrace would significantly degrade this future oak woodland-savanna and prevent the eventual formation of an approximate 45 acre natural habitat area in the park east of Watt Ave.

Significance. We find the above a "Significant Adverse Impact" and recommend Jones and Stokes and Assoc. reassess their "Potentially Significant" finding.

Mitigation: Since the entire terrace east of Norris Swale is a potential oak regeneration area, any development within the area would degrade natural habitat values. We believe the neighborhood park should be removed from the terrace east of Norris Swale and that the planned facilities can be included in a combined day use recreation and neighborhood park west of Norris Swale. Moreover, the terrace east of Norris Swale is quite far from parking. (Steve Talley for ACRP)

Response: Comment noted. The finding of "potentially significant" was made because mitigation measures were suggested on page 43 of the DEIR that would reduce this impact to less

than significant. The finding of "significant" impact was reserved for unmitigable impacts.

D-40

Comment: Mitigation, golf ball hazards to softball players and cars on roads. Why not suggest redesigning the eastern end of golf course to lessen potential hazards. The large amount of unmowed rough and low topography of the area render this economically feasible. If a fast growing (usually exotic) vegetation is used to form a barrier the primary attention should still be given to placement and care of native vegetation to form a permanent barrier. Landscaping with native vegetation is an important component of the overall mitigation package for the softball complex. (Steve Talley for ACRP)

Response: Redesign of the eastern portion of the golf course has been included as a mitigation measure in both the Revised Summary Table found in Section 2 of this document and the Errata to page 44 of the DEIR. It was not the City's intention to suggest that exotic vegetation should be used to form a golf ball barrier. The errata to page 42 of the DEIR indicates that the plant used for the vegetative barrier should be native.

D-41

Comment: Impact, elimination of soccer fields, Sports Complex-2. The soccer field would not have to be eliminated if fairway #13 of Haggin Oaks Golf Course was moved 200 ft into a 400 ft rough area separating it from fairway #14. This could be accomplished even if the softball fields were set further south than is shown in EXHIBIT B-4. (Steve Talley for ACRP)

Response: The availability of the day-use area as a practice field and the Cherry Island complex for league games reduces the importance of including a soccer field on the sports complex site. See also response to Comment B-8.

D-42

Comment: Impact, Reduced parking with Sports Complex-3. We do not find the smaller paved-landscaped parking facility used with this proposal a disadvantage as long as access is provided to overflow parking at the southwest end of the facility. The need for more than 400 parking spaces will be only occasional and overflow parking is the sensible way to accommodate such peak crowds. This same argument applies to Sports Complex-2. (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

D-43

Comment: Since parking for Sports Complex-1 is located in an ecologically sensitive area no argument except the one for no project would mitigate its impacts. (Steve Talley for ACRP)

Response: The Sports Complex 1 parking lot is located in an ecologically sensitive area. Relocation of the parking area, as well as implementation of the no-project alternative, would mitigate its impacts.

D-44

Comment: GENERAL COMMENT: The only real disadvantage of Sports Complex-3 is that there would not be sufficient room for a soccer field. Mitigation for this impact upon a growing sport would be to allow for a slightly larger combined neighborhood and day use recreation park west of Norris Swale so a soccer field could be located there without impacting other activities at this location. (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

D-45

Comment: Access Route B. This route (Nov. 14, 1984 conceptual plan) avoids the creek except to cross at a relatively degraded area. It would also avoid the terrace. (Steve Talley for ACRP) It would impose adverse impacts upon the Sacramento Horsemen's Association which could be mitigated. Overall significance: less than significant. (Steve Talley for ACRP)

Response: The impacts of Access Road B on the SHA are discussed in detail in the Errata to the DEIR for page 42. The only way to completely mitigate these impacts would be to redesign Access Road B to avoid the SHA facility.

D-46

Comment: Other improvements. Placing a day use recreation and neighborhood park, respectively, into the centers of the terraces west and east of Norris Swale would substantially increase human impacts on what natural habitat area remained. This is a significant adverse impact. Mitigation would be to concentrate active uses on the larger (20 acre) terrace just east of Renfree Field and leave the other terrace as natural habitat. This would substantially decrease the boundary length between active and passive areas to the benefit of the latter. (Steve Talley for ACRP)

Response: Comment noted. This mitigation is suggested on page 43 of the DEIR.

D-47

Comment: The Draft EIR mentions the adverse effects of the proposed new bridge over Arcade Creek. It indicates that the adverse effect will be loss of vegetation. The worst portions of the trails are those that pass under the existing bridges. Yet there is no mention of the increased erosion and degradation of the trails where they will be crossed by the new bridge. Since there is no mention of the problem, there is no mitigation measure suggested either. We believe that trail stabilization under the new bridge and under the existing bridges would be reasonable mitigation for this severe problem of accessibility. We ask that the final EIR consider the problem of trail erosion. At minimum, trails should be mapped, trouble spots identified, and an analysis made of the condition of trails under the existing bridges. That analysis should be applied to a discussion of the new bridge's impact on the trails. Effective methods of trail stabilization should be included in mitigation measures. (Alta Tura for Sacramento Audubon Society)

Response: Implementation of the Master Plan may result in trail erosion problems under the proposed bridge. Reasonable mitigation for this impact would be to ensure that the erosion problem caused by the proposed bridge is minimized. The existing erosion problems are not related to the proposed project.

In order to minimize trail erosion under the proposed bridge, the area should be revegetated with native ground cover immediately after construction. Provision should be made to capture runoff around the area of the bridge and pipe it via a culvert under the trail and into Arcade Creek to further reduce erosion potential. If a trail erosion problem occurs in spite of these steps, then measures should be taken to reinforce the downhill side of the trails in the area of the proposed bridge. A native rock retaining wall, or wattling, should eliminate any persistent problem.

D-48

Comment: I would like to see a post and cable system incorporated into the plan that separates the sports complex from the natural area. This fencing system should also be put along the access road to separate the roadway from the bicycle lane. (Douglas Shaw)

Response: Comment noted. No response necessary.

D-49

Comment: The overlay that was displayed on plan #3 at the City Council Committee Meeting addresses the concerns of the Horsemen's Association by avoiding the clubhouse area. It also avoids the majority of the regenerating oaks that are a concern of the environmental groups. (Ron Radigonda for Greater Sacramento Softball Association)

Response: Comment noted. No response necessary.

D-50

Comment: In conclusion, I feel that the major issues regarding the environmental concerns can be resolved by using a composite of the three plans, and by using the overlay access road illustrated on plan #3 at the City Council Committee Meeting. (Ron Radigonda for Greater Sacramento Softball Association)

Response: Comment noted. No response necessary.

D-51

Comment: In view of Sacramento's expressed commitment to "maintaining the natural or native environment for low-intensity uses designed to ensure long-term protection," I feel that the development of a sports complex in Del Paso Regional Park would be a disservice to the community and is inconsistent with stated policy. Such a high-intensity use development not only destroys the natural environment upon which it is situated, but detracts from the beauty and enjoyment of surrounding park areas as well. (Doris Urch for Sacramento Horsemen's Association)

Response: Comment noted. No response necessary.

D-52

Comment: While locating a sports complex in a park does not enhance the games played there in any way, the presence of a sports complex in a park environment, with its attendant congestion, noise, automobile traffic, exhaust fumes, and litter can only detract immeasurably from the public's enjoyment of the surrounding park facilities. I believe the general public's concept of a park is a place where one can walk, jog, ride horseback, picnic, or just plain relax in an atmosphere of natural beauty, as far removed as possible from population pressure, and the aforementioned congestion, noise, traffic, etc. (Doris Urch for Sacramento Horsemen's Association)

Response: Comment noted. No response necessary.

D-53

Comment: Potential for navigation hazards - to what extent might the proposed project affect safe navigation in California's waterways? (Department of Boating and Waterways)

Response: The project is not located on a navigable waterway, so navigation would not be affected.

D-54

Comment: Beach erosion - to what extent might the proposed project affect the stability of coastal as well as inland beaches? (Department of Boating and Waterways)

Response: The project would not affect either coastal or inland beaches.

D-55

Comment: Boating and boating facilities - to what extent might the proposed project affect existing or planned small craft harbors, launching facilities, and other boating facilities? To what extent might recreational boating activities be affected? (Department of Boating and Waterways)

Response: The project would not affect boating facilities or recreational boating activities.

D-56

Comment: The purpose of regional parks is to provide diversified recreational opportunities such as softball, golf, picnicking, hiking, and horseback riding. (William Gubel for Greater Sacramento Softball Association)

Response: Comment noted. No response necessary.

D-57

Comment: The Draft EIR points out that the proposed project is inconsistent with the City's plan to maintain a natural environment; however, we feel the total project should include a balance of recreational needs of Sacramento residents as well as protecting portions of the natural areas of the park. The access road should be placed in the least destructive area to meet environmental needs. (William Gubel for Greater Sacramento Softball Association)

Response: Comment noted. No response necessary.

D-58

The softball complex is needed in the Sacramento metropolitan area and should remain high on the priority list for Del Paso Regional Park. (Deni Treaster for Golden Seniors Softball Club)

Response: Comment noted. No response necessary.

D-59

We support the project and understand the need for a buffer zone between the softball complex and the park's natural area and feel that your Department has made a conscientious effort to keep the natural area intact as well as meet our needs for a softball facility. (Deni Treaster for Golden Seniors Softball Club)

Response: Comment noted. No response necessary.

D-60

Comment: The SMUD infrastructure is already in place to serve this development. The proposed sports complex for this project will be located under an existing 69kV transmission line. Any relocating or undergrounding of this 69kV line will be done at the expense of the developing party. The City or the developers should contact the District's Distribution Planning Department for the cost estimates on the removal and relocation of the 69kV transmission line. The specialist for the planning areas where the Del Paso Plan is located is Lamar Hinds. You can contact him at 732-5789. (SMUD)

Response: Comment noted. No response necessary.

D-61

Comment: The District's Conservation staff has specifically recommended the following measures: Energy efficient high-pressure sodium lighting installed where appropriate. (SMUD)

Response: Comment noted. No response necessary.

D-62

Comment: The District's Conservation staff has specifically recommended the following measures:

- a) Remote control capabilities to assure timely and proper operation.

- b) Photocells installed in conjunction with remote controls.
- c) Controls are to be located in secure areas.
- d) Multi-level switching to provide various levels of lighting in response to different types of events. (SMUD)

Response: Comment noted. No response necessary.

D-63

Comment: Uses of the area northeast of Watt Avenue must be watched as we have a 230kV underground transmission line through the area paralleling Auburn Boulevard. No structures should be placed within the easement, excavations must be monitored and trees should not be planted in or too near the easement. (SMUD)

Response: Comment noted. No response necessary.

D-64

Comment: On page 124 and 125 this 69kV line is referred to as a 16,000 volt line. (SMUD)

Response: These changes are included in the errata to pages 124 and 125 of the DEIR.

D-65

Comment: I am in complete support of Mr. John Jones letter. (Greg McMurray for Sacramento Horsemen's Association)

Response: Comment noted. No response necessary.

D-66

Comment: The Department of Transportation, Division of Aeronautics, has reviewed the above-referenced document with respect to those areas germane to its statutory responsibilities. Those areas include the impact of noise and safety from an airport on the project, the project's impact on an airport itself, and the compatibility of adjacent land uses in the vicinity of an airport. Said document appears to address all of the issues of concern to this Division, and there are no additional comments to add at this time. (Department of Transportation)

Response: Comment noted. No response necessary.

D-67

Comment: First of all, I think that I express the sentiment of most of the members of SHA who feel that any access route to the softball diamonds which crosses the Arcade Creek from Longview Drive will be a detriment to the natural area which exists there now and will invariably cause problems for the many people on horses who ride the bridle trails along Arcade Creek every day. If a bridge is built across the creek, it could be a barrier to those using the trails if it is not constructed properly. It will cause more erosion of the creek bank because high waters will be funneled through a narrower opening. (Stan Oppgard for Sacramento Horsemen's Association)

Response: Comment noted. No response necessary.

D-68

Comment: I strongly support Mr. John Jones' letter to you dated November 26, 1984 and would also like to emphasize that the EIR did not mention the impact of air pollution, noise pollution, light and glare and other problems which will impact on the Sacramento Horsemen's Association. I feel that the Sacramento Horsemen's Association was completely ignored in the report. (Stan Oppgard for Sacramento Horsemen's Association)

Response: Comment noted. Air quality impacts on the SHA facility and users were not mentioned because air quality standards are not expected to be exceeded in the vicinity of the project site. Noise impacts were not discussed because of the high existing ambient noise levels caused by the freeways, major roads, and aircraft. Neither noise from the sports complex nor noise from the access roads should impact existing noise levels. Light and glare from car headlights, particularly along Access Road B, would impact the SHA facility. This impact could be mitigated by constructing a wooden fence or planting a dense hedge along Access Road B. Lights from the softball complex will be shielded and so are not expected to impact the SHA facility.

D-69

Comment: This proposed facility, if an access road is built across Arcade Creek, will have a very negative impact on the many people who value the rural nature of the Arcade Creek area and who enjoy it every day. (Stan Oppgard for Sacramento Horsemen's Association)

Response: Comment noted. No response necessary.

D-70

Comment: The Arcade Creek Restoration Project supports an athletic complex with four softball fields. We believe an even number of fields is best because this would allow tournament play where winners and losers are successively paired. We also believe a soccer field should be located within Del Paso Park if provision is not being made for this facility in a nearby park. With careful planning a soccer field could be added to the neighborhood park east of Renfree Field. (Steve Talley for ACRP)

Response: This comment is suggested as a mitigation measure on page 43 of the DEIR.

D-71

Comment: We are not surprised that the amount of cut and fill needed to build all three sports complex proposals would be substantially reduced if the southern pair of fields is graded to an elevation three or four feet higher than the northern pair of fields (Table 1). The changes in elevation would be absorbed within the bleacher areas and aisles between the southern and northern pair of fields. The amount of cut and fill needed for the sports complex-1 proposal would be greater than for the 2A or 2B proposals because fields #3 and #4 would extend further into the vernal pool depressions because of the wider aisles (Table 1). (Steve Talley for ACRP)

Response: Comment noted. The City is currently working on a specific design for the sports complex. Information about the amount of cut and fill required will be valuable in the final design process.

D-72

Comment: Picnic-Playground Area: The picnic-playground area in the sports complex 2A or 2B proposals would be highly scenic. In either case they would be on a rise with the proposed natural area on their north, west, and east boundaries. The golf course and athletic complex would be beyond their southwest and south boundaries, respectively (Figures 2 and 3). The picnic-playground areas for the sports complex 2A and 2B proposals would have their own modest parking areas and they would be enclosed by a cyclone fence. A gate in the fence would remain open allowing access to the natural area during the majority of the time when softball tournaments were not underway. During tournaments the gate would remain closed to facilitate the city's effort to collect admission and protect the natural area from unusually heavy human impact. The small separate parking lot for the picnic area would assist people with walking impairments, those with small children or loads (ice chests etc.). The separate parking area with access to a significant natural area would make the picnic-playground area a

natural place for week-end or afternoon family gatherings or as a meeting area for groups visiting the natural area. (Steve Talley for ACRP)

Response: Comment noted. A locking gate between the proposed picnic area and the natural area would help to prevent heavy human use of the natural area during softball tournaments. It would also facilitate lower impact use of the natural area during the times when the sports complex would not be in use.

D-73

Comment: The access route for the sports complex 2A plan would leave Longview Drive opposite Industry Drive, traverse the uplands along the eastern margin of the Sacramento Horsemen's Association, and enter the sports complex and picnic-playground area just north of the green for hole #15 in Haggin Oaks Golf Course. This access route would, thus, stay away from the Arcade Creek terrace west of Watt Ave. - an area of regenerating oak woodland and savanna and the principal botanical asset in Del Paso Park (Figure 2, inset). (Steve Talley for ACRP)

Response: Comment noted. This alternative has been considered by the City in the final design process.

D-74

Comment: An access route opposite Industry Drive would adversely impact the Sacramento Horsemen's Association by coming within approximately 20 ft of their clubhouse, taking out the eastern 12 to 15 ft of an arena, and a small circular corral. We suggest the city sponsor the following mitigation for these impacts: the clubhouse should be relocated immediately to the northwest, the Horsemen's Association lease should be expanded to include the uplands between Arcade Creek and Longview Drive they have long needed for overflow parking, the arena and corral should be rebuilt on a suitable site, and more and better parking areas developed on the association grounds. (Steve Talley for ACRP)

Response: Comment noted. Another alternative, which would eliminate the Horsemen's facility related concerns, would be to design the final access road to avoid impacts to the SHA facility.

D-75

Comment: The Arcade Creek Restoration Project believes the Horsemen's Association would be better off if the athletic complex access route went along their eastern boundary and the aforementioned mitigation measures were adopted. However, we

acknowledge the longstanding presence of the Horsemen's Association in Del Paso Park and realize they are almost entirely responsible for the trail system that we all use and enjoy. If there is strong sentiment within the Horsemen's Association to simply "leave things the way they are" we will respect this position. Toward this end we have developed a specific site plan which would utilize an access route off of Longview Drive which would be opposite of Airport Drive. (Airport Drive is approximately 700 ft east of the Horsemen's Association.) This route would avoid crossing the Arcade Creek terrace west of Watt Ave. by running parallel to Longview Drive east toward Watt Ave., cross Arcade Creek utilizing a curve with an approximately 300 ft radius, and then run parallel to the Watt Ave. and Business I-80 right of way to the athletic complex. A spur road would extend along the northern margin of the softball fields to the picnic-playground area (Figure 3). (Steve Talley for ACRP)

Response: Comment noted. The City has considered this access route in the final design process.

D-76

Comment: An obvious adverse impact of the sports complex 2B access route is that it would bring a paved road within ten ft of the base of the large heritage blue oak (50" dbh) just north of the proposed toll booth. Since the toll booth just south of this oak tree is on a moderate rise the road under the tree will probably require a shallow fill in which case damage to the tree's root system is likely to be minimal. The large drooping limbs on the south side of this tree's crown could probably be saved with skillful pruning - a professional arborist should be consulted. (Steve Talley for ACRP)

Response: Comment noted. This access route has been considered by the City in the final design process. Access Road 2B could also be moved west of the large heritage blue oak to avoid damaging the tree.

D-77

Comment: We also note that whereas the complex 2B access route could damage the 50" dbh blue oak the configuration of the softball fields would permit the relict blue oak (23" dbh) in the oak savanna area to be saved. It would be in the aisle between fields 3 and 4 in an area where the cut and fill could be less than one foot. (Steve Talley for ACRP)

Response: Comment noted. The positioning of the fields is being considered by the City in the final design process.

D-78

Comment: Another positive aspect of the sports complex 2B plan is that the picnic-playground area would not be adjacent to the main access route. This would provide greater safety for children and reduce the amount of noise and air pollution in the picnic-playground area during softball tournaments. (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

D-79

Comment: Parking: We do not understand why the city's planners selected the Arcade Creek terrace for the sports complex-1 parking lot. If the same two foot incremental drop between the southern and northern pairs of softball fields suggested for sports complex-2A was adapted to the complex-1 plan the 200 ft wide mall opening to the parking lot would be at about 69 ft elevation. This would mean a four foot drop from the athletic facility to the upper margin of the parking lot if the latter was graded to take advantage of the existing average elevation and slope gradients of the Arcade Creek terrace. (In this case the parking lot would be about 66, 64, 60, and 61 ft elevation, respectively at its SE, SW, NW, and NE corners.) (Figure 1). (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

D-80

Comment: If the complex-1 parking lot was graded to be more or less even sloping, cuts of up to four feet would be made into the rise immediately west of the large heritage valley oak (dbh 57"). Four foot cuts would also have to be made just SSW of the large heritage blue oak (50" dbh) near the Watt Ave.-Business I-80 on ramp. The third largest oak on the Arcade Creek terrace (a 46" dbh blue oak) would be in the center of an approximate 400 by 250 ft elliptical fill area which would be about 2 1/2 ft deep about the tree's base. This fill would also cover the most significant examples of blue oak reproduction remaining in Del Paso Park (Figure 1). (Steve Talley for ACRP)

Response: Comment noted. The DEIR discusses the impacts of the Sports Complex 1 parking lot on page 58. The cut and fill information, which is in addition to the impacts provided in the DEIR, will be valuable to the City in the final design process.

D-81

Comment: The proposed access route from the parking lot to Longview Drive does not align with Airport Drive unless the parking area is to be even larger than the one shown in the city's conceptual drawing. We acknowledge there is little traffic on Airport Drive due to its dead end at the I-80 right of way. Nevertheless, we believe it would be safer to plan the access route opposite an existing intersection rather than create an entirely new intersection. If the sports complex access was opposite Airport Drive it would have to cross Arcade Creek and then curve to enter the sports complex-1 parking lot. (Steve Talley for ACRP)

Response: Comment noted. No response necessary. This information will be considered by the City in the final design process.

D-82

Comment: Additional problems with the sports complex-1 parking lot are the lack of overflow parking areas and the damming of a swale along the parking lot's southeastern margin. Without provision for overflow parking we believe the scraps of original terrace vegetation remaining along the western and northeastern boundaries of the parking lot would become de facto overflow parking areas. To avoid seasonal ponding along the southeastern margin of the parking area a ditch or culvert would probably have to be dug adjacent to the large (50" dbh) blue oak -- the same oak that would experience four foot cuts along its southwestern margin! (Steve Talley for ACRP)

Response: Comment noted. This information will be considered by the City in the final design process.

D-83

Comment: By placing the parking facility on the north side of the athletic complex, soccer players and spectators would have to walk over 1,000 ft to get to the playing field. Without access to the extensive unused lands between Business I-80 and Haggin Oaks Golf Course these lands will not be able to function as public park land (Figure 1, inset). (Steve Talley for ACRP)

Response: Comment noted. The City will consider this access problem in the final design process.

D-84

Comment: The parking lot for sports complex 2A and 2B splits into three drainages which flow onto Haggin Oaks Golf

Course. Topographic gradients in the open field south of the athletic complex are modest. The area can probably be graded to an even slope with an approximate one foot cut centered about the 75 ft contour line running southwest of softball field #2. This material would primarily be deposited immediately to the southeast along the Business I-80 right of way. Another smaller cut and fill would be necessary at the extreme southern end of the paved parking area (Figure 1). (Steve Talley for ACRP)

Response: Comment noted. Cut and fill information will be valuable to the City in the final design process.

D-85

Comment: The sports complex 2A and B parking lot will have an extensive overflow parking area in the annual grassland to the southwest between Business I-80 and Haggin Oaks Golf Course. Again we emphasize the sports complex-1 proposal would not provide overflow parking. (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

D-86

Comment: In favor of increasing outdoor recreation opportunities in Sacramento area. (Joel Hessing)

Response: Comment noted. No response necessary.

D-87

Comment: The trails have fallen into disrepair during the last 3-4 years due to limited funds. There are 80,000 horses in Sacramento and vicinity (including Yolo and Placer Counties), so horsemen are a large interest group. (Ann Taylor)

Response: Comment noted. No response necessary.

D-88

Comment: Access Road C with the overlay is the favored alternative because it is shorter and as a result will be less expensive. This alternative will also eliminate the need for providing a buffer between the golf course and the access road. (Ann Taylor)

Response: Comment noted. No response necessary.

D-89

Comment: A bridle trail bordered on both sides by barriers is not favored because this would not allow riders to use the open space within the park. (Ann Taylor)

Response: Comment noted. Without barriers to prevent motorized vehicles from entering the bridle trails rigorous enforcement by either park rangers or City police will probably be required to eliminate this potential conflict.

D-90

Comment: The location of the proposed complex is a plus because out of town players can be housed in nearby motels. Lodging has been a problem for other locally held national tournaments. Tournaments can generate revenue for Sacramento area merchants. (Rose Stinson)

Response: Comment noted. No response necessary.

D-91

Comment: The environmental concerns are understandable and can hopefully be mitigated.

Response: Comment noted. No response necessary.

D-92

Comment: I was involved in writing native Oaks Our Valley Heritage, parts of which are included in the Appendix of the DEIR. There is a lot of new information available about protecting oaks when developing around them. I am helping in the process of updating the book and am available for consultation about the Del Paso project. (Jim Trumbly)

Response: Comment noted. The City may call upon you for information to ensure that oak trees are protected to the maximum extent feasible during project construction.

D-93

Comment: The method used to analyze the impacts of the access road in the DEIR should be changed. The access routes are analyzed in relationship to specific sports complex and parking lot alternatives. The problem with this method is that each access alternative could be combined with any of the three sports complex alternatives. (Jim Trumbly)

Response: A brief summary of the significant impacts of each alternative component of the proposed project is included in Section 2, Key Revisions.

Section E: Soils and Geology

No comments received.

Section F: Vegetation and Wildlife

(Except for typographical corrections,
all comments are verbatim)

F-1

Comment: The city's proposal for an athletic complex is environmentally destructive in that it would destroy the largest stand of regenerating oak woodland and savanna in our region to gain little more than a large (700 car) parking lot. Even with this size parking area the lack of overflow parking capacity would imply some illegal parking in what little natural area remained under this plan. (Steve Talley for ACRP). Moreover, the siting of the athletic complex itself would needlessly wipe out remnant vernal pools on the uplands adjacent to Arcade Creek (Steve Talley for ACRP).

Response: Only the Sports Complex Alternative 1 proposes a parking lot that would eliminate an important oak regeneration area. Alternatives 2 and 3 would minimize the natural area remaining between Arcade Creek and the proposed facilities. Overflow parking in natural areas could be prevented by installation of post and cable barriers along the access road and around the perimeter of the parking lot and by vigorously enforcing "no parking" areas.

F-2

Comment: The city's proposal for an athletic complex is environmentally destructive in that it would destroy the largest stand of regenerating oak woodland and savanna in our region to gain little more than a large (700 car) parking lot. Even with this size parking area the lack of overflow parking capacity would imply some illegal parking in what little natural area remained under this plan. (Steve Talley for ACRP). Moreover, the siting of the athletic complex itself would needlessly wipe out remnant vernal pools on the uplands adjacent to Arcade Creek (Steve Talley for ACRP).

Response: Alternatives 1, 2, and 3 would result in the destruction of vernal pools to varying degrees. Alternatives 1 and 2 would remove or disturb all vernal pools in the northern portion of the project site and Alternative 3 would remove the vernal pool in the south near the freeway. All four vernal pools on the site are degraded, probably attributable to prior golf course and agricultural operations (DEIR p. 56). The existing pools may not be historic natural pools, but rather new

pools that are supporting a few vernal pool species. The presence of the few vernal pool species implies a seed source from other pools in the vicinity (unlikely) or historic pools on or near the present location (likely). The loss of the existing vernal pools is not considered to be a significant impact on the habitat type because there are many other pools in the Sacramento area which are superior representatives of this biological habitat. The present site constitutes approximately .003 of one percent (DEIR page 56 and 57) of the remaining younger low terrace vernal pool habitat in Sacramento County.

F-3

Comment: The principal problem is that Jones & Stokes was so misled concerning where the city's alternate routes were actually supposed to go they finally accepted the environmentally destructive access route through the middle of the Arcade Creek terrace as the least objectionable of the three routes analyzed! This conclusion is inexcusable.

Response: Any new access road constructed across Arcade Creek will have adverse impacts on the vegetation and wildlife of the riparian zone. The reason that Access Road A was said to have the least impact when compared to Roads B and C was because it was the shortest in length and most direct. It did not parallel Arcade Creek as did Access Roads B and C. It is the placement of the parking lot adjacent to the creek that would constitute the major impact to biological resources in this scenario, not the access road itself. Access roads following alongside the creek have a greater potential for adverse impacts to wildlife due to the introduction of large volumes of traffic and their associated secondary impacts (e.g., degradation of riparian vegetation, disturbance to wildlife by humans). A variation of Sports Complex 1 with the parking lot at the south end of the complex is being discussed. This variation would require an extension of Access Road A south through the oak savanna and grassland eventually connecting it to a parking lot south of the sports complex. The specific alignment of this variation is under discussion among City staff and interested citizens, but it will most probably trend east and south of the Road Access A creek crossing, avoiding sensitive resources. The alignment of the road should avoid paralleling the creek, passing within the dripline of the heritage oaks, and crossing the existing oak regeneration areas. By trending south and east, it should leave a significant portion of the terrace free of project facilities. See also discussion of the parking lot location in Section 2, Key Revisions, of this FEIR.

F-4

Comment: Our analyses suggest the access route favored by Jones & Stokes could have severe adverse impacts upon the park's

larger wildlife (grey fox, red-tailed Hawks) because the terrace traversed by this road would be the largest of only two significant foraging areas left in the park after developments contained in the master plan were completed. The Arcade Creek terrace west of Watt Ave. is also the site of the park's largest heritage oaks, it possesses the largest continuous area of oak reproduction in the park (and in surrounding areas) (Steve Talley for ACRP), it is a first order open space asset with considerable aesthetic value (Steve Talley ACRP) and is the central component of the largest parcel remaining from Rancho del Paso outside of the American River Parkway. Rancho del Paso was once 44,000 acres and was nationally famous as a horse breeding ranch under the ownership of James Haggin in the late nineteen hundreds. These latter data are from the EIR but they were not included in the impact summary underscoring the problems with this Draft EIR. (Steve Talley ACRP)

Response: Comment noted. We agree that the Sports Complex 1 alternative (as originally proposed) would disrupt an important foraging area for raptors such as the red-tailed hawk, great-horned owl, American kestrel, and other wildlife. These particular species, however, have adapted well to man's presence as is demonstrated by their abundance in and around Sacramento. As long as foraging areas contain adequate populations of small mammals for red-tailed hawks, they don't require large expanses of foraging habitat. Gray fox that currently occupy territories within the park would likely be reduced by project construction, due to loss of cover and foraging habitat and increased human use.

F-5

Comment: Our analyses suggest the access route favored by Jones & Stokes could have severe adverse impacts upon the park's larger wildlife (grey fox, red-tailed Hawks) because the terrace traversed by this road would be the largest of only two significant foraging areas left in the park after developments contained in the master plan were completed. The Arcade Creek terrace west of Watt Ave. is also the site of the park's largest heritage oaks, it possesses the largest continuous area of oak reproduction in the park (and in surrounding areas) (Steve Talley for ACRP), it is a first order open space asset with considerable aesthetic value (Steve Talley ACRP) and is the central component of the largest parcel remaining from Rancho del Paso outside of the American River Parkway. Rancho del Paso was once 44,000 acres and was nationally famous as a horse breeding ranch under the ownership of James Haggin in the late nineteen hundreds. These latter data are from the EIR but they were not included in the impact summary underscoring the problems with this Draft EIR. (Steve Talley ACRP)

Response: The DEIR (pages 60 and 69) recommended that all mature oak trees and locations of regenerating oaks should be preserved. Besides possessing aesthetic qualities, oaks provide important wildlife habitat by supplying food, nesting, perching, and roosting sites.

F-6

Comment: Our analyses suggest the access route favored by Jones & Stokes could have severe adverse impacts upon the park's larger wildlife (grey fox, red-tailed Hawks) because the terrace traversed by this road would be the largest of only two significant foraging areas left in the park after developments contained in the master plan were completed. The Arcade Creek terrace west of Watt Ave. is also the site of the park's largest heritage oaks, it possesses the largest continuous area of oak reproduction in the park (and in surrounding areas) (Steve Talley for ACRP), it is a first order open space asset with considerable aesthetic value (Steve Talley ACRP) and is the central component of the largest parcel remaining from Rancho del Paso outside of the American River Parkway. Rancho del Paso was once 44,000 acres and was nationally famous as a horse breeding ranch under the ownership of James Haggin in the late nineteenth hundreds. These latter data are from the EIR but they were not included in the impact summary underscoring the problems with this Draft EIR. (Steve Talley ACRP)

Response: See response to Comment F-5.

F-7

Comment: The City of Sacramento did offer two alternatives for their Plan 1 softball complex which would avoid decimating the Arcade Creek terrace west of Watt Ave. by placing the parking lot on the south instead of north side of the softball fields. However, one of the alternatives (Plan 2) would still destroy the vernal pools. The conceptual drawings for these alternatives were so inaccurate, particularly respecting the access routes, the staff at Jones & Stokes Associates appears to have been unable to analyze them objectively. ACRP believes this confusion was what finally led the consultants to conclude the access route directly through the Arcade Creek terrace was less destructive than a route east of the Sacramento Horsemen's Association or one paralleling Longview Drive and Watt Avenue. ACRP considers this conclusion inexcusable because they presented topographically precise maps of the Longview Drive access route and discussed the route east of the Horsemen's Association well before the Nov. 19th deadline for inclusion of comments into the Draft EIR. We anticipate the City of Sacramento will concentrate its remaining effort and funds upon expanding Plan 2 or 3 (see Appendix 1 for copies of these plans) and will provide Jones & Stokes Associates with access routes which are both

topographically precise and realistic. We hope these data are presented to the public on the evening of November 14th. (Steve Talley for ACRP)

Response: See response to Comment F-3. The City of Sacramento has provided the consultant with topographically precise maps showing the three alternatives. These are included in the FEIR as revised Exhibits B-3, B-4, and B-5.

The Longview Drive access route, as proposed by ACRP, was not considered in the DEIR because it was not one of the alternatives being considered by the City, due to its sharp curves and curving bridge. These aspects of the road make it infeasible from a traffic and engineering standpoint.

F-8

Comment: Preserve the oak woodland and savanna north of Longview Drive: ACRP believes all or most of the oak woodland and savanna north of Longview Drive and west of the Senior Gleaners facility should be preserved as natural habitat because the region is a restorable example of the upland plant community which once typified the Metropolitan Sacramento Area. It is an important nesting and foraging area for wildlife and contains a 1940 WPA culvert of exceptional quality and aesthetic value. Indeed, the culvert should have been mentioned under cultural resources in the Draft EIR. The region is particularly important to the Del Paso Park mitigation package because it represents a somewhat intact example of the type of habitat which is being lost to development of the athletic complex. Moreover, blue oak woodland and savanna found north of Longview Drive was once the most widespread plant community within Del Paso Park. Today it is the most restricted. Despite these facts and a considerable portfolio of photographs of the area which was given to Jones & Stokes Associates on Oct. 5, 1984, the Draft EIR contains not a word about this region. This situation should be corrected immediately. (Steve Talley for ACRP)

Response: No discussion of the area north of Longview Drive was included in the DEIR because the area was not part of the project under consideration. Any mitigation for impacts due to project features should first be sought at or adjacent to the project facilities. The area north of Longview Drive suggested in this comment should only be considered if adequate on-site mitigation is not available. See Comment K-12 for suggested on-site mitigation.

The sports complex site for Alternatives 2 and 3 (and the playing fields of Alternative 1) is located on disturbed grassland, not on blue oak woodland or blue oak savanna. The parking lot of Alternative 1 is in an area of disturbed grassland and oak savanna, but the oaks include valley, interior, and blue oaks. The blue oaks are the least abundant of the three

species. The sports complex could not be said to be causing the loss of a blue oak woodland or savanna.

F-9

Comment: Maintain the ecological integrity of the terrace west of Watt Avenue: ACRP does not understand how Jones & Stokes Associates determined the access route through the Arcade Creek terrace west of Watt Avenue was less damaging to plant, animal, and aesthetic values than routes around either side of the terrace. Our primary concern respecting the terrace is to retain the region's ecological integrity. We are not that concerned if a route which retains the functional integrity of this region removes a few more mature trees than a route cutting the terrace in two. (Steve Talley for ACRP)

Our analysis of an access route through the creek terrace west of Watt Avenue suggests adverse aesthetic, botanical, and wildlife impacts which would be difficult to mitigate. The terrace is large enough to provide a sense of isolation to those who venture out into the region's western two thirds. Some views within the terrace are almost totally devoid of urban structures. Placing a road through this terrace would shatter this unique aesthetic value. Disturbance during road construction would also tend to introduce weeds and the problem would persist along the shoulder of the road, particularly if it was mowed. The most damaging effects could be to wildlife. Beechy ground squirrels, jackrabbits, striped skunk, and California meadow mouse are common on the terrace. A road through this area would result in many of these animals being struck by autos. Populations of these animals within the park are large and they would not be endangered. However, this is not the case with the larger mammals, raptors, and owls which would be attracted to these carcasses. Only two nesting pairs of red-tailed hawk are known in the park. With the proposed developments the region will probably support only one territory -- at least until the mitigation discussed under item 6 is functional. Since the terrace west of Watt Avenue would be the largest foraging area remaining in the park, raptors would concentrate there. The same would be true of the reclusive grey fox which is probably present in the park today and which will only have enough room for one cluster of overlapping home ranges after park development. The problems an access route across this terrace would pose for the park's larger wildlife are summarized by highway wildlife mortality studies which conclude the problem is not serious primarily because of the relatively small portions of a species' range affected by roads. This will not be the case in Del Paso Park after construction of developments contained within the master plan. The situation should not be rendered even more threatening to these larger species by insensitive placement of roads. (Steve Talley for ACRP)

Response: See response to comment F-3. Preserving as much of the natural habitat as possible in the project area is of concern to the City of Sacramento. Because the optimum habitat is located in the northern portion of the terrace west of Watt Avenue and includes heritage oaks, oak regeneration areas, riparian habitat, and vernal pools, it would seem to make the most sense to locate the sports complex and parking lot as far from these resources as is feasible. None of the proposed access roads bisects the terrace; it is the location of the parking lot in Sports Complex Alternative 1 that would eliminate a significant portion of this habitat. See also the discussion of the parking lot locations in Section 2, Key Revisions of this FEIR.

F-10

Comment: Preservation and enhancement of vernal pools: Jones & Stokes Associates accurately describe the history and current degraded condition of vernal pools in the grasslands west of Watt Avenue. ACRP concurs with Jones and Stokes regarding the necessity of a complete species list from the pools. However, we do not consider vernal pool preservation contingent upon finding endangered or candidate endangered species there. These pools are all that remains of this unique ecosystem within the large open space parcel west of Watt Avenue which possesses both soil and topography suggestive of vernal pools prior to plowing by park tenants and/or city maintenance personnel. The pools should be preserved and enhanced as part of a mitigation package to offset past destruction of sensitive environmental values to justify developing the largest grassland habitat remaining within Del Paso Park.

ACRP suggests the following components for the vernal pool mitigation package:

- a) Layout and position for the athletic complex should preserve at least the largest pool (pool #1 in Figures 2 and 3 of ACRP's Oct 15, 1984 correspondence). If the athletic complex cannot fit between Haggin Oaks Golf Course and Business 80 without removing the pools, additional space must come from relocation of fairway #13 and the tee for fairway #14, not the vernal pools. We have presented the city with a discussion and maps regarding how much land could be produced with relatively little effort through this action (see letter and maps to Robert P. Thomas from ACRP dated Aug. 28, 1984).
- b) A new watershed will need to be contoured for the vernal pools which should also contain examples of relatively small pools typical of our region. After the layout for the athletic complex has been finalized on accurate topographic sheets the location and extent of the vernal pool watershed can be determined. ACRP cannot accept a

watershed which leaves addition of sufficient water or exclusion of irrigation water from the softball fields into the vernal pools up to human judgment. The area must be sufficient for pool filling from precipitation and irrigation flow must be directed away from the pools by gravity. The specifics of these criteria are left to the vernal pool consultant.

- c) When the vernal pool watershed and newly created vernal pools have "settled down" all of the pools in the region should be restocked with the species likely to have occurred in pools of their respective size prior to disturbance of the region. We specifically recommend Colusa grass (Neostaphia colusiana) should be introduced into pool #1. Since Jones & Stokes Associates has a recognized vernal pool scientist, there should not be any problem obtaining the necessary permit(s) to collect seed, cultivate specimens, and introduce endangered species this project will require.

This mitigation package will increase the number, area, and diversity of the Del Paso Park vernal pools. By returning ecological values to the park which were lost long ago the city will be effectively mitigating for the violation of its own policy inherent in the developments proposed by the Del Paso Regional Park Master Plan. In this way the sports complex will be rendered compatible with the city and county natural habitat policy. Proposing to remove the pools for the athletic complex or to replace them with one or two pools on the Sacramento Science Center grounds would further exacerbate the loss of environmental values within the park and invite litigation. Adding vernal pools to the Science Center grounds is a worthy endeavor but it does not constitute replacement of the vernal pools west of Watt Avenue. (Steve Talley for ACRP)

Response: Vernal pool preservation is not contingent on the presence of endangered species. When pools are in a degraded state, however, the presence of an endangered species would significantly alter any evaluation of the value of the pools. The pools (in their present degraded state) represent only .003 of 1 percent of the low terrace vernal pool habitat in Sacramento County and, as such, are not significant. Any plan that would retain and enhance the existing pools is laudable, but in an era of limited funds for preservation and enhancement, these pools may be commanding disproportionate attention. Park management funds might be better spent on protecting and enhancing the oak woodlands, especially the regeneration sites.

F-11

Comment: I further recommend that the City adopt a policy that takes a percentage from the sports complex revenues, at

least 5%, to adequately fund the restoration of the Del Paso Regional Park natural areas. (Ray Tretheway)

Response: The City of Sacramento does not expect sufficient revenue generation from sports complex activities to fund the restoration program of Del Paso Regional Park natural areas. In fact, during the first few years of operation this sports complex may operate at a deficit. Other fundings would have to be sought.

F-12

Comment: The Sacramento Valley Chapter of CNPS understands the need for a sports complex in Sacramento, and although placing it in Del Paso Regional Park is in opposition to both city and county policies to acquire and maintain natural areas, will endorse the facility if adequate mitigation measures can be carried out to preserve the environment. These measures must be sufficient to make up for loss of open space and wildlife habitat for forage and cover, loss of riparian, woodland and savanna oak habitat both for large heritage and regenerating young oaks, for loss of creek habitat in the event of bridging, and because in the long run development will cause deterioration of the natural areas. (Betty Matyas for CNPS)

Response: Mitigation measures for vegetation and wildlife preservation were recommended in the DEIR. Mitigation measures were suggested in the DEIR to minimize the losses of habitats (especially riparian, woodland, and savanna oak habitats, heritage and regenerating oaks) and the potential impact of overuse of the park (siting and directing activities not related to nature study and appreciation away from sensitive areas).

The loss of existing open space cannot be compensated unless existing development is removed. The improvement of wildlife habitat by planting native species for landscaping was suggested in the DEIR (page 69). The improvement of wildlife habitat in areas not scheduled for development would help to compensate for losses of habitat due to development. The dedication to permanent open space and management for wildlife of areas such as the east end of the park will help to compensate for any wildlife habitat losses. See response to Comment K-2 for elaboration on the habitat enhancement plan.

F-13

Comment: Serious steps must be taken to preserve the large oaks by keeping them in their natural setting, not in asphalt, to preserve oak habitat by placing the sports arena and parking lot as far south on the property as possible, and to restore oak woodland and oak savanna. The great oak forests that grew four miles wide on each side of our valley rivers are gone, and the

tiny fragments of remaining oak habitat are being gobbled up rapidly. The importance of this valley characteristic was emphasized last week by the county supervisors' action to sponsor Tree Foundation's 1985 Year of the Oak - to bring back the native habitat. (Betty Matyas for CNPS)

Response: Comment noted. The DEIR recommended preservation of heritage oaks and oak regeneration areas. Mitigation measures (page 60) and Appendix I outlined precautions required for oak preservation in construction zones.

F-14

Comment: Sports Complex Plan 1 would be unsuitable to our considerations for the following reasons:

- 1) parking lot ruins the old terrace, the area of oak regeneration,
 - 2) too close to the riparian area, and parking lot eliminates foraging and cover for ground dwelling species,
 - 3) heritage oaks would be placed in asphalt, an unnatural setting,
 - 4) cut and fill necessities would damage the heritage oaks, and eradicate blue oak reproduction by covering them.
- (Betty Matyas for CNPS)

Response: Comment noted. Impacts associated with the Sports Complex 1 alternative were discussed on pages 58 and 66 of the DEIR.

F-15

Comment: Sports Complex 2 might be a more workable plan, with mitigations, because:

- 1) parking is to the south of the sports complex
- 2) terrace would be left available for revegetation, also protecting the creek wildlife corridor,
- 3) would be convenient if access were to be made from the south. (Betty Matyas for CNPS)

Response: Comment noted. Impacts associated with the Sports Complex 2 alternative were discussed on pages 58 and 67 of the DEIR. Access to the sports complex from the south is discussed in response to Comments B-5 and B-11.

F-15a

Comment: Bridging the creek, and also paralleling it, would be undesirable because of loss of wildlife and vegetation on both sides of the creek. (Betty Matyas for CNPS) A dangerous

horse-car conflict would be present. The traffic figures for the Watt-Longview intersection have been underestimated, and traffic would clog on both streets. (Betty Matyas for CNPS)

Response: Comment noted. Impacts of bridging and paralleling the creek were discussed in the DEIR (pages 59, 67, and 68). See also responses to Comments D-22, D-45, and D-74.

As shown in Exhibit H-6 of the DEIR the preproject level of service at that intersection is "A." This is based on manual traffic counts taken on October 2, 1984. The postproject level of service would be "C-D" based on trip generation assumptions shown in Exhibit H-7 and trip distribution assumptions shown in Exhibit H-3.

F-16

Comment: The area east of Norris Swale be left entirely as a natural area to mitigate for loss of forage and cover area by the sports complex, and by lawn planted to the west of Norris Swale. (Betty Matyas for CNPS)

Response: Comment noted. If the neighborhood park is incorporated into the day use area, the area east of Norris Swale would remain as a natural area. This mitigation measure is being considered by the City. See response to Comment K-2 for an elaboration of the use of this area for mitigation.

F-17

Comment: In summary, we recommend use of Plan 2 with mitigations for habitat loss:

- a) area east of Norris Swale to be left natural for forage and cover and recovery of native vegetation
- b) area north of Longview to be preserved for the same reasons (Betty Matyas for CNPS)

Response: Comment noted. See response to Comments F-8 and F-16.

F-18

Comment: That reforestation be allowed to take place on the old terrace, and east of Norris Swale, and that this effort be assisted with plantings, if necessary. (Betty Matyas for CNPS)

Response: Comment noted. The DEIR recommends preservation of the oak regeneration areas, which will ultimately result in reforestation of portions of the old terrace and the area east

of Norris Swale. See Mitigation Measure - Use Park Management techniques to Control Indiscriminate access to Resource Areas (1, 2, 3, A, B, C, Others) (DEIR page 62). These same techniques should be used throughout the park to protect the natural areas and especially to allow natural revegetation to occur.

F-19

Comment: To adequately assess the impacts of developments on the oak regeneration areas and vernal pools, and the impact of the floodplain on the proposed developments, specific maps including the floodplain, oak regeneration areas and vernal pools must be drawn for each of the alternatives as well as for the proposed developments in East Del Paso Park. Without these maps, the validity of the DEIR's conclusions regarding the impacts of the developments are unsubstantiated. (Nancy Lindsay)

Response: See revised exhibits in Section 2, Key Revisions of this FEIR.

F-20

Comment: The analysis of the impacts of the parking lot must include, at a minimum, vegetational and wildlife impacts (Nancy Lindsay), runoff and the effects of runoff on the water quality of Arcade Creek (Nancy Lindsay), and the tradeoffs between different sized parking lots and the environmental destruction resulting from the different sized parking lots. In order to evaluate the tradeoffs, a justification for the different sizes of parking lots is necessary. (Nancy Lindsay)

Response: The vegetation and wildlife impacts of the parking facilities were included in the DEIR (page 58-60 and 66-68) in the discussions of the impacts of the sports complex alternatives. The only alternative in which the impacts of the parking facilities differ significantly from the impacts of the rest of the complex is in Alternative 1. The impacts described for Sports Complex 1 in the DEIR apply predominantly to the oak savanna just south of Arcade Creek and thus to the parking facility. The impacts of Sports Complex 1 are very similar to Sports Complex 2 if the parking facility is moved to the south end of the complex for the first plan. See also the discussion of the parking lot location in Section 2, Key Revisions, of this FEIR.

F-21

Comment: This is most obvious in the discussion of Access Road A on p. 59 which says, "Access Road A would have the least

impact on vegetation of the area because of its short length."
(Nancy Lindsay)

Response: See response to Comment F-3.

F-22

Comment: Thus, the final EIR must reevaluate the vegetational and wildlife impacts of the access routes as they relate to the parking lot and sports complex components. (Nancy Lindsay)

Response: See response to Comments F-3 and F-20.

F-23

Comment: Bird migrations" (page 62, paragraph 4, line 6), it fails to assess the importance of the natural habitat area in relation to other natural habitat areas in the city and county of Sacramento. (Nancy Lindsay)

Response: A comparison of all other natural habitat areas in the City and County of Sacramento is beyond the scope of the EIR.

F-24

Comment: (page 51, paragraph 4, line 1); however, it does not assess the actual availability of this type of habitat in the city and county of Sacramento. The Final EIR must include a more substantive review of the availability of riparian woodlands and oak savanna throughout the city and county of Sacramento in order to assess the cumulative impacts of developing Del Paso Park. (Nancy Lindsay)

Response: Conducting a review of the availability of riparian woodlands and oak savannas throughout the City and County of Sacramento is beyond the scope of this EIR. Both habitat types are being diminished in areal extent throughout the City, County, and State by development. The DEIR suggests the avoidance of development and protection of these two habitat types.

F-25

Comment: The report points out clearly that all three access roads would have an impact upon the riparian vegetation, but Road B would impact vegetation significantly more due to the 800 ft. portion which parallels the creek on the south side. Road C would have a similar impact as B due to its paralleling the creek. Road A, on the other hand, would have less impact

than either due to its shorter length. To mitigate this impact the study suggests redesigning the road so it doesn't parallel the creek. Mitigation is fine, but without setting forth the "redesign" how can we determine whether the "redesign" will solve the problem and if it does, the impact the "redesign" will have? (John Jones for SHA)

Response: Redesign of Road A is being considered by the City. This modification would move the parking lot to the south of the sports complex and extend Road A to the new parking lot. The alignment of the extension of Road A will travel to the east and south of the Arcade Creek crossing. No redesign is being considered for Road B near the Sacramento Horsemen's Association facilities. The concentration on redesign of Road A is to avoid the impacts of paralleling Arcade Creek as proposed under Road B and C.

F-25A

Comment: Heritage oaks are worth protecting. According to the study, the placement of Road B through the natural area south of the riparian zone would fragment the area resulting in the need to remove Heritage oak trees. The study goes on to point out that the placement of Road A may be in the designed road way. The operative words here are "would" and "may."

Response: Comment noted. The DEIR emphasized the comparisons of conceptual alternatives. The exact location of the bridge crossing for each alternative had not been refined to the point of identifying individual plants that might be affected by construction at the time the DEIR was written. The final design and precise location of the bridge is still a matter for discussion and will be based on many factors including impacts to vegetation. See Comment F-15.

F-26

Comment: The recommended mitigation for Road B is to design Road B to avoid as many oaks as possible. This design will still effect oaks. To what extent, the study doesn't make clear. (John Jones for SHA)

Response: See response to Comment F-25A. The access road B as shown in revised Exhibit B-4 will avoid the large oaks in the northwestern corner of the terrace, but would probably remove some oaks and other vegetation at the stream crossing.

F-27

Comment: Recommended mitigation for Road A is to avoid Heritage oaks. This recommendation suggests that all oaks can be avoided. (John Jones for SHA)

Response: Road A can be constructed so that it avoids all the heritage oaks. By placing the parking lot at the south end of the sports complex (see Section 2, Key Revisions) it would avoid impacting of the terrace south of Arcade Creek with its associated oak trees. If the parking lot is constructed north of the sports complex (Exhibit B-3), special care could be taken during the construction phase to preserve the oaks (See Appendix I of the DEIR).

F-28

Comment: Preserve Natural Open Space North of Longview: Preserve the vanishing blue oak woodland/savanna north of Longview Drive (west of the Senior Gleaners) and restore the 1940 WPA bridge. Don't even consider developing this rare plant community to create revenues for natural habitat restoration and management elsewhere in the park. The city must exhaust all other possible funding sources for this purpose before sacrificing any more of our natural heritage. (Tim Vendlinski for ACRP)

Response: Comment noted. No response necessary.

F-29

Comment: Preserve Ecological Integrity of Creek Terrace West of Watt: Preserve the ecological and aesthetic integrity of the regenerating oak woodland/savanna and vernal pool system west of Watt Avenue. We will only accept an access route which retains this area's ecological integrity. We will oppose any route which carelessly splits the terrace. (Tim Vendlinski for ACRP)

Response: The City is working with interested citizens to develop a plan for the sports complex and access road that will preserve as much of the oak woodland/savanna habitat as is possible. The extensive work being undertaken by the City and interested groups and individuals will not accommodate a "carelessly" chosen road alignment. The present distribution of resources and use of the area by wildlife can accommodate a carefully designed road alignment.

F-30

Comment: Preserve Vernal Pools and Create Drainage: Preserve the vernal pools and construct a drainage to allow for rainwater pooling in winter and prevent the pooling of irrigation water in summer. Restore the pools' plant diversity by introducing indigenous plant species and attempt to introduce endangered species. Rearrange portions of golf course fairways, if necessary, to accommodate the softball facility and preservation of vernal pools. Remember, the park supports 36 golf

fairways consuming hundreds of acres while only a single large and restorable vernal pool remains on a scrap of undeveloped creek terrace. (Tim Vendlinski for ACRP)

Response: The extensive redesign of the sports facility, redesign and reconstruction of the golf course, recontouring for proper drainage, and an elaborate planting program for the vernal pools could be considered "overkill" for a degraded resource that most likely is not natural. If the desire is to have a representative vernal pool(s) in the park for educational purposes, efforts should be directed to placing the pool(s) in a location where it (they) can be more effectively managed and protected as recommended in the DEIR (pages 61 and 62). If the desire is to protect a valuable resource, efforts should be directed to other higher quality vernal pool sites.

F-31

Comment: Construction Impacts: Explain how proposed project will be built, i.e., access routes for heavy equipment, earth moving vehicles, and trucks carrying construction materials. Recommend ways to prevent these operations from inadvertently destroying sensitive natural resources. Damage could be greatly avoided if all construction equipment enters the project area via golf course maintenance roads. (Tim Vendlinski for ACRP)

Response: Construction practices for using heavy equipment on project sites typically include flagging or fencing of sensitive resources. Fencing provides greater security. Some assurance of the care in protecting sensitive areas can be alleviated by specifying protection measures in contracts with contracting firms, requiring performance bonds, and assigning City staff to monitor construction practices.

An access route through the golf course may not be consistent with its operation. An alternative suggestion would be to limit road construction by contract to a very minimum width right-of-way to minimize impacts and to require the completion of the access road before any other construction begins. Construction equipment access could then be restricted to the paved roadway.

F-32

Comment: Explain how the park's riparian oak woodland/savanna ecosystem operates as a significant regional component of Sacramento's "urban natural open space system" which includes Bannon Island and Slough, Effie Yeaw, Bushy Lake, Orangevale Park, and Goethe Park. Compare the ecological integrity of Del Paso Regional Park with these other areas and define their importance to the urban environment in terms of education,

recreation, economics, and environmental quality. (Tim Vendlinski for ACRP)

Response: A discussion of this nature would require extensive research and is beyond the scope of this EIR.

F-33

Comment: Significance of Regenerating Oak Woodlands and Heritage Oaks: ACRP is pleased that Jones & Stokes Associates recognizes the rarity of regenerating oaks and the uniqueness of healthy Heritage Oaks in an urban area. However, several key areas of oak regeneration were left out of the discussion. ACRP urges the field investigators to reexamine the areas north and south of Longview Drive, south of Park Road, on the fringe of the 13 acre creek terrace east of Renfree, and in the area east of Norris Swale. Moreover, these regeneration areas should be presented on a detailed base map which characterizes the open space as it now exists. The EIR presents the regeneration areas on a very small map of the conceptual master plan in Exhibit F-2. This makes the data not only difficult to interpret, but also presupposes the implementation of the entire conceptual plan. Since most of the park's oak regeneration is occurring within the natural open space, there is no need to include a map of the entire golf course. Provide current maps of the undeveloped park areas and then depict regeneration areas. Use Dr. Talley's detailed vegetation maps of the park. A number of these were provided to the city. (Tim Vendlinski for ACRP)

Response: Some of the areas identified as oak regeneration areas in this comment (e.g., Longview Drive) were outside the project's study area and, therefore, not covered in the DEIR.

Significant oak regeneration areas that might be impacted by the proposed project features were identified in Exhibit F-2. No attempt was made to identify on the exhibit any young oaks in the Master Plan designated natural areas or on park property outside the proposed project areas.

The choice of a base map for this exhibit was dictated by the desire to use one base map throughout the report for consistency and ease in comparisons.

Dr. Talley's detailed sketch maps of vegetation in selected areas of the park were used as references in the preparation of the DEIR. Additional base maps have been included in Section 2, Key Revisions of this FEIR.

F-34

Comment: Destruction of Oak Regeneration Areas and Vernal Pools: Oak regeneration areas and vernal pools have been or are

being damaged by mismanagement of the park's natural open space. Frequently, the city has mowed or run over oak saplings with maintenance trucks. Vernal pools have been severely degraded by mowing and raking by unsupervised "502" work crews. ACRP urges the City Council to order Parks and Community Services to prepare and implement a management plan for the park's natural areas to guard natural resources while protecting the surrounding community from fire hazard. Explain how sensitive management can both improve natural habitat while reducing the risk of fire. Take into account the fire hazard created by the huge amounts of debris Park Road residents have placed along Park Road to discourage off-road vehicle abuse. (Tim Vendlinski for ACRP)

Response: Comments on the question of fire hazard and debris along Park Road are beyond the scope of this EIR. The City is aware of the problems and will deal with them as a part of its ongoing maintenance program.

The suggestion for a management plan to govern the operation of the park's natural areas is an important one. Such a management plan needs to incorporate the entire park, not just areas designated as natural areas. The management plan needs to combine all the park's functions, vegetation, wildlife habitat, recreation, education, etc., into a coordinated whole. Such a coordinated management plan would seek to maximize all the functions, but would, by necessity, require deciding on priority uses for different areas in the park. Wildlife values in the park could be enhanced by modification of existing operations and maintenance procedures.

F-35

Comment: Urban Forest Concept and 1985 Year of the Oak: The city has simultaneously proposed to create a vast urban forest (largely of exotic trees) in South Sacramento and to destroy a vast native oak urban forest in Del Paso Regional Park. The former urban forest has already cost thousands of dollars to plan and will take many years and much more money to create. The latter native urban forest comes absolutely free and is already flourishing. The City Council has a rare opportunity to preserve the reproducing oak woodlands in Del Paso Park by adopting ACRP's six point mitigation package. Such action would preserve an irreplaceable example of the Central Valley's natural heritage. Does it make sense to decimate our last functional oak woodland community in a year designed to honor and raise public awareness about our native trees? Explain the paradox of city action and recommend ways to eliminate this inconsistency. (Tim Vendlinski for ACRP)

Response: Discussion of the proposed urban forest is outside the scope of this EIR. None of the proposed facilities at Del Paso Park would "decimate our last functional oak

woodland." Mitigation measures and/or alternative project features have been suggested in the EIR that could reduce to insignificant impacts on the existing oak woodland community.

F-36

Comment: Disaggregate Impact Categories: Without disaggregated analysis separating impacts of parking lots from softball fields from access routes, the consultants concluded Access Road A directly through the Arcade Creek terrace was the least destructive access option. However, the only reason this road is short and inexpensive is because it immediately leads into an enormous parking lot right in the middle of the park's most active oak regeneration area. Thus, the integrity of the oak community would be lost due to road division and the regenerating oak woodland would be totally decimated. The EIR must disaggregate discussion of the lots, fields, and roads so the best road can be matched with the best lot and these two elements can then be matched with the best field design. (Tim Vendlinski for ACRP)

Response: See Section 2, Key Revisions for a discussion of a different alignment for Road A.

Access Road A does not cross directly through the Arcade Creek terrace; it terminates in a parking lot on the terrace. The parking lot of Sports Complex 1 would result in many of the impacts of concern in this comment.

If the parking lot of Sports Complex 1 is moved to the south end of the complex, many of the concerns for the terrace would be diminished. Access Road A would need to be extended to the new parking lot. The alignment for the extension of Access Road A has not been finalized, but there are options directing the alignment to the south and east that would be a compromise between bisecting the terrace and paralleling the Creek. Paralleling Arcade Creek would, as discussed in the EIR (pages 67 and 68), impact wildlife in the riparian corridor. These are possible routes for the alignment of the extension of Access Road A that avoid impacting the large oaks or regenerating oaks. In the tradeoff between crossing the forage area of the terrace or paralleling the creek, crossing the terrace is potentially less harmful to wildlife.

F-37

Comment: Resource Value of Vernal Pools: The EIR states that if no threatened or endangered species are located in the pools or if the pools are dominated by non-vernal pool species, resource protection efforts should be foregone. This discussion avoids the central question of how a species becomes endangered.

This question is very relevant in this case because park development threatens an entire ecosystem of the small-stream oak woodland system. The main cause of reduced biota diversity is habitat destruction. Riparian/oak woodland species are not endangered now, but may soon find their way onto the endangered species list if their natural habitat continues to be destroyed. Must we wait for a plant or animal species to reach the brink of extinction before we appreciate its existence? The large vernal pool in the park is restorable and may be able to support vernal pool species that have all but vanished from the Central Valley. Explain how such a program would not only be of tremendous educational value, but also be a significant step toward preserving plant diversity. (Tim Vendlinski for ACRP)

Response: Habitats such as vernal pools need not support rare or endangered plant species to be considered important. While it is a fact that vernal pools have become a limited resource in the Central Valley, much better examples of this habitat occur in Sacramento County. Del Paso Regional Park may have supported vernal pools historically; however, the present pools are the result of agricultural and park operations and are in a degraded condition. The riparian/oak woodland habitat is a much more valuable resource to wildlife and should receive priority for preservation in road alignment, parking lot construction, and sports facilities siting.

F-38

Comment: Explain how the displacement of these raptors by park development may lead to overpopulation of rodents throughout the entire park. (Tim Vendlinski for ACRP)

Response: Development of Del Paso Regional Park may lead to a reduction in raptor use of the area due to elimination of some foraging habitat; however, maintaining the riparian zone would ensure continued nesting of raptors. Species such as the red-tailed and red-shouldered hawks, black-shouldered kites, Cooper's hawk, and great-horned owl do not necessarily need large expanses of foraging habitat as long as sufficient populations of small mammals exist. At the same time that foraging habitat is removed from the park by habitat conversion (i.e., parking lots, softball fields), habitat also is removed for small mammals. It is doubtful that rodents would become a nuisance due to overpopulation. A sufficient feral cat population probably exists in and around the park to prevent such an occurrence.

F-39

Comment: Explain how this overpopulation could threaten oak regeneration as hungry rodents chew through the saplings' cambium. (Tim Vendlinski for ACRP)

Response: Rodents have been implicated in diminished oak regeneration. The seed (acorn) and seedling stages are vulnerable to rodent use (Knudsen pers. comm.). There is little chance, however, that the rodents would become so abundant as to threaten oak regeneration in the park (see F-38).

F-40

Comment: Estimate the acreage of foraging space required to maintain raptors within the park and then determine which park areas are best suited for permanent protection as critical natural habitat. (Tim Vendlinski for ACRP)

Response: The use of space by birds of prey is a dynamic process. The amount of space an individual utilizes depends, in part, on the time of year, stage of reproduction, and sex of the individual. The use of space is known to be affected by climate as well as hunting pressure (McCray 1981). Home range size was found to correlate positively with body size in birds of prey (Schoener 1968). It is believed that most birds of prey defend only the area immediately around the nest and that home ranges are often widely overlapping (Brown and Amadon 1968, Newton 1976).

With the above information in mind, it can be stated that attempting to qualify "acreage of foraging space required to maintain raptors within the park" would be a difficult task. The existing individual birds of prey in the park could be monitored using radio telemetry to determine their individual home ranges, but the data gathered would not give a threshold acreage for maintaining raptors in the park.

The preferred habitat of each raptor species now occurring in the park could be researched in the literature and some comment as to habitat preferences related to the vegetation communities made. Because the birds of prey in the park are all species that adapt well to human activities, it would be difficult to design a study that identified natural habitat critical to their survival. A detailed literature review could provide a speculative, but documentable answer.

F-41

Comment: The need for sensitive facility placement and innovative mitigation for developments within natural habitat areas is due to the rare and declining nature of the plant communities threatened by these developments. These plant communities are:

1. Old growth riparian oak forest which is reported to be extant over 0.1% of its former range.

2. Regenerating creek terrace (high terrace) oak woodland and savanna which is really a rarer subunit of the riparian oak forest cited above. Moreover, this community type is disappearing at a faster rate than other riparian forest types.
3. Regenerating blue oak woodland and savanna which was once widespread in our region. This community type was also once the most widespread community within Del Paso Park. Today it is the most restricted community. Except for unusual areas like the Del Paso Park stands blue oak woodland have not successfully reproduced during the last century.
4. Low terrace vernal pools which are estimated at less than 5% of their original range in Sacramento County. (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

F-42

Comment: GENERAL COMMENT: We also need to recognize that by just protecting young oak trees and developing areas with little or no trees we are selectively removing oak savanna as a future component of park vegetation. Since oak woodland and savanna was once the dominant vegetation within the region we find this action inappropriate. Open areas must also be preserved if we are to retain representative samples of the ecosystem itself. (Steve Talley for ACRP)

Response: A balance needs to be achieved in the undeveloped areas of the park between savanna and woodland. Different wildlife species or functions are supported by the different habitats. Oak regeneration could be encouraged in some areas (i.e., where it is now occurring) and grassland encouraged in others. Some of the oaks are regenerating in dense clusters, others are developing singly. At least for the near future the oaks are regenerating the two different habitat types.

F-43

Comment: Vegetation and Wildlife, Vegetation, Vernal Pools, Sports Complex-2. Sensitive placement of softball fields or a return to a three field complex like that shown in EXHIBIT B-2 (but with sensitive placement) would preserve at least the larger vernal pool in the "main" northern vernal pool area. The loss of the vernal pool habitat from its last significant area in Del Paso Park is viewed as a significant adverse impact irrespective of the current presence or absence of endangered species. (Steve Talley for ACRP)

Response: The presence of endangered species would elevate the value of the pools to significant. The present degraded vernal pools with their weedy vegetation are not significant in comparison with other vernal pools or the extent of pools in the County. If the pools were restored or new pools created, they would have educational value.

F-44

Comment: Vernal Pools, Sports Complex-3. The small southern vernal pool does possess Psilocarphus sp. which is only found in the largest northern pool where it is very rare. Other, possibly endangered, species could be there too. If complex-3 is selected this area could be put inside an enclosure and species of special concern introduced to one or several of the northern pools. The difference in species composition between northern and southern pools is suggestive of catastrophic selection. (Steve Talley for ACRP)

Response: The DEIR suggested (page 61) surveying the pools for state or federally designated endangered species in the spring. Setting aside a small pool within an enclosure would not necessarily prevent its loss. The pool would need an offsite water source (a "watershed") and some thoughtful and dedicated protection. A pool the size of the one in the south and its isolated location does not make it an educational resource. The small pool might make a start or "seed" for a larger vernal pool restoration site if sufficient area is available and an adequate restoration plan could be developed.

F-45

Comment: Access Roads A, B, C. Comments should be revised to fit current designs. Access route A should be labeled as inducing significantly adverse impact because it would bisect the Arcade Creek terrace west of Watt Ave. if it was not attached to a parking lot which removes the terrace ecosystem altogether. (Steve Talley for ACRP)

Response: See response to Comment F-36.

F-46

Comment: Other Improvements, Impact. The entire terrace area on either side of Norris Swale is a potential oak regeneration area. When it becomes permissible to develop areas where oaks are not currently present we prevent future regeneration and/or exclude oak savanna from the future park vegetation. The best mitigation measure is to leave one terrace natural and develop the other one. (Steve Talley for ACRP)

Response: Comment noted. The entire Norris Swale (both terraces) is a preferred mitigation area for both vegetation and wildlife impacts for other project features.

F-47

Comment: Sports Complex-1. Development of the parking lot would destroy the largest oak regeneration area in our region. High terrace oak woodland-savannas are quite rare. Those which also possess young oaks are even rarer. The parking lot for complex-1 would obliterate this asset and thereby trigger a significantly adverse impact. (Steve Talley for ACRP)

Response: The impacts of the parking lot for Sports Complex 1 were discussed in the DEIR (page 58).

F-48

Comment: There have been only two "beneficial" suggestions made in the Del Paso Park environmental process that we know of. These suggestions are to rehabilitate the vernal pools and to restore critical wildlife habitat within the denuded rough areas in Haggin Oaks Golf Course. To date, none of these suggestions is contained in this EIR. (Steve Talley for ACRP)

Response: Rehabilitation of the vernal pools was not recommended in the EIR. The DEIR (page 60) recommends avoiding the pools or relocating (DEIR page 61) the pools to a more protected location or to a location conducive to their educational use. Rehabilitating the vernal pools would probably take as much effort as attempting to move them.

The suggestion to revegetate the "roughs" of the golf course should be approached with caution. Weedy grasslands provide some of the foraging area of local predators. Introducing trees and shrubs would change the wildlife use of such areas to the benefit of some species and the detriment of others. Revegetating the roughs should only be undertaken as a part of an overall resource management plan for the park. Such a plan should consider carefully both the vegetation and wildlife consequences of proposed revegetation suggestions.

F-49

Comment: Sports Complex-1. The large heritage oaks within the proposed parking area would be subject to two to four foot cut and fill. These trees are so large that preserving 1½ times the diameter of their dripline would render the parking area impractical to design. Bringing the parking lot closer to these trees would seriously threaten them. This would be a serious adverse impact and mitigation is not possible. (Steve Talley for ACRP)

Response: Any design for a parking lot incorporating proven techniques for oak tree preservation would be a challenge for the designers and would provide fewer parking spaces than an unvegetated site. The DEIR recommends use of proven techniques (page 60). The DEIR also indicates the Sports Complex 1 plan as the most potentially damaging to oaks of the three plans.

F-50

Comment: Sports Complex-2. The proposal put forth by the city at the Nov. 14, 1984 Draft EIR hearings is still too close to the terrace. Impacts would be potentially significant, but could be mitigated by a high cyclone fence. This in turn would have adverse aesthetic impacts. The best mitigation would be to move the complex further to the south which would also permit preservation of at least the largest vernal pool. (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

F-51

Comment: Sports Complex-3 would be well removed from the terrace and vernal pool ecosystems. Its impacts would be less than significant. (Steve Talley for ACRP)

Response: The DEIR states (page 58) that Sports Complex 3 is the least damaging of the three plans to vegetation and less damaging to wildlife than Sports Complex 1 (2 and 3 are co-equal).

F-52

Comment: Access Route A. Even without the parking lot on the terrace this route would bisect the ecosystem that exists there. This impact would be at least potentially significant. (Steve Talley for ACRP)

Response: See response to Comment F-36.

F-53

Comment: Access Route B. This route (Nov. 14, 1984 conceptual plan) avoids the creek except to cross at a relatively degraded \pm area. It would also avoid the terrace. (Steve Talley for ACRP)

Response: Commented noted. The route does parallel the creek and has the potential for impacting riparian corridor wildlife.

F-54

Comment: Wildlife, Impact Sports Complex-1. This plan would place a parking facility in one of the most sensitive raptor and small mammal foraging areas of the park. This is a significant adverse impact for which no mitigation is available within the scope of plan 1. (Steve Talley for ACRP)

Response: See response to Comment F-4.

F-55

Comment: Access Route A. Even without a parking lot on the terrace this route would endanger small game on the terrace. Larger mammals and raptors would be drawn to these carcasses extending the danger to the park's more sensitive wildlife. Significant adverse impact. (Steve Talley for ACRP)

Response: The existence of roads and parking lots in county parks (e.g., Ancil Hoffman Park) has not resulted in a significant impact on wildlife due to collisions between motor vehicles and wildlife. Small game such as quail or jackrabbits are wary of humans and usually seek areas with sufficient cover. Even if occasional road kills were to occur, it is not expected to create a significant adverse impact for larger mammals or raptors. Speed bumps or other measures could be installed on roads within the park to prevent people from travelling at excessive speeds.

F-56

Comment: Access Route C. As revised on Nov. 21, 1984 this route would pose some problems. The south abutment of the bridge would be tempting for animals to cross which spend the day in the riparian zone and forage on the terrace at night. Some sort of deflecting mechanism should be used to keep them in the riparian corridor until they are west of the bridge. By following the alignment for Watt Ave. the access route would probably follow the outer boundaries of territories of larger mammals which have long adjusted to the presence to busy roads nearby. The impact would probably be potentially significant. (Steve Talley for ACRP)

Response: The nature of the impact identified in the last sentence of the above comment is unknown. Heavily travelled, fenced roadways do act as deterrents to free passage of wildlife species. Access under the roadways at bridges would free animals from having to cross major roadways on-grade and allow larger territories than would be anticipated in the above comments. Special devices at undercrossings or overcrossings of roadways have been used to deter animals (i.e., deer) from on-grade passage.

F-57

Comment: Section O, CUMULATIVE IMPACTS, Setting and Impacts. The Cumulative Impacts section appears to miss the point altogether. We are not concerned about just the projects outside Del Paso Park (EXHIBITS O-1, O-2). Although the Stanford Home for Children will remove significant habitat for small mammals and raptors, we are also concerned with the developments within Del Paso Park whose impacts are individually significant or potentially significant and cumulatively very significant and adverse to humans, plants, and wildlife. This must be addressed in the Final EIR. (Steve Talley for ACRP)

Response: Potential impacts of proposed development on natural resources within Del Paso Park have been addressed in the DEIR sections on vegetation and wildlife and in the response to comments on vegetation and wildlife.

F-58

Comment: Mitigation. Despite the intensity of individual and cumulative impacts of development within and about Del Paso Regional Park mitigation measures are available to substantially reduce the negative effects upon open space and natural habitat. We have considered this problem in detail and refer you to pages 2-8 of the Arcade Creek Restoration Projects Nov. 14, 1984 correspondence. Jones & Stokes Associates are invited to incorporate this mitigation package into their EIR as mitigation for cumulative impacts. (Steve Talley for ACRP)

Response: Comment noted. Responses to the mitigation package are covered in response to Comments F-8, F-9, and F-10. Care must be taken in evaluating the mitigation measures to avoid inadvertently favoring one habitat or wildlife species over another until an integrated coordinated management plan is developed for the park. Such a plan needs to develop priorities for habitats and species (e.g., planting shrubs and trees at the expense of grassland must be made with the realization that grassland wildlife species will be lost).

F-59

Comment: At the local level, Sacramento Audubon has its own special interest in Arcade Creek. It has long been used by our chapter as a convenient area to lead bird watching field trips. It is especially valuable for beginners because of the diversity of bird species that can be found there. (Alta Tura for Sacramento Audubon Society)

Response: Comment noted. The importance of Arcade Creek and Del Paso Regional Park to birds has been discussed in the DEIR (Wildlife section). Exhibit F-4 (pages 64 and 65) illustrates the diversity of birds that have been observed in the area.

F-60

Comment: The Draft Environmental Impact Report suggests that the vernal pools must be saved, only if endangered plant species are found in the pools in spring 1985. All four of the vernal pools must be saved regardless if the pools do, or do not contain endangered plants. The planning policy under the 1984 City Master Plan states "Identify and acquire sites containing significant native plant communities, or examples of ecological relationships to make the area available for public visitation, education, and recreational use". (Douglas Shaw)

Response: The vernal pools on the site are not "significant native plant communities." They were formed by golf course and agricultural operations and support only a few of the plant species typically found in vernal pools. They are not good examples of "ecological relationships" for educational purposes. If the pools are properly protected and maintained, or if they are transplanted and enhanced they could be of educational use.

F-61

Comment: As outlined in the Draft EIR the mitigation measures for the impact on the regenerating oaks is to locate the softball fields as drawn on plan #2. This plan also maintains the, 4-diamond, wheel configuration which is the best alternative for conducting softball leagues and tournaments. (Ron Radigonda for Greater Sacramento Softball Association)

Response: Comment noted. No response necessary.

F-62

Comment: Although the vernal pools have environmental significance, their existence is manmade. If the existing vernal pools cannot be avoided, they could be relocated into an interpretive area of the park. (Ron Radigonda for Greater Sacramento Softball Association)

Response: Comment noted. See DEIR (pages 60, 61, and 62).

F-63

Comment: The conceptual site plan (1) offered by the Department of Parks and Community Services is completely insensitive to the natural area resources which have almost miraculously persisted up to the present in the area between Business 80 and Haggin Oaks Golf Course. Remnants of all three major ecosystems which typified the Sacramento area a century ago still persist here: riparian forest dominated by valley and interior live oak, old creek terraces which support oak woodlands and savanna with all three species of native oaks

(valley, interior live, and blue oaks) and upland blue oak woodland and savanna. At least some of the blue oak savannas on the Del Paso Park uplands once possessed vernal pools as local areas still support seasonal ponding and vernal pool species. (Steve Talley for ACRP)

Response: Comment noted (see DEIR section on Vegetation).

F-64

Comment: The Nature Conservancy reports riparian forest in California is now restricted to one tenth of one percent of its pristine range. The California Department of Water Resources has also demonstrated riparian forest in the Sacramento Valley which is dominated by valley oak is declining at a faster rate than other types. Nearly all of the old alluvial terraces were cleared for agriculture long ago due to their fertile loam soils and low risk of flooding. It is unusual to find a creek terrace on the valley floor with substantial tree cover remaining and even rarer that such an area possesses abundant oak reproduction. Significant nonriparian oak regeneration has not occurred in rural areas since the 1880's implying California's oak-covered hills may be greatly reduced in the future. The history within Del Paso Park has obviously been different from these rural areas as our uplands contain abundant reproduction of oaks. (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

F-65

Comment: One of the best nonriparian oak reproduction areas within Del Paso Park is about the large heritage oaks along the southern boundary of the Arcade Creek terrace west of Watt Avenue. Just west of these trees are the vernal pools. These are large pools whose present configuration has resulted from past disturbance related to the development of Haggin Oaks Golf Course. But the underlying soil which has permitted the existence of these pools was not manmade. A small relief vernal pool in the field northwest of the Auburn Blvd/I-80 on-ramp suggests these unique ecosystems may have been widespread in the upland blue oak savanna of Del Paso Park. (Steve Talley for ACRP)

Response: Comment noted (see DEIR section on Vegetation).

F-66

Comment: Any two or three of these botanical assets: intact riparian oak forest, regenerating oak woodland on a large creek terrace, regenerating blue oak savanna on uplands, vernal

pools would constitute an important natural area on the floor of the Sacramento Valley. In Del Paso Park all four elements occur within an approximate 40-acre area. Moreover, the area is only 5 minutes of walking time from the Sacramento Science Center and Junior Museum which has a major commitment to teach nature appreciation. Anyone who attended Joseph Cornell's children's nature appreciation seminar last winter will realize the value of these unique natural assets. (Steve Talley for ACRP)

Response: Comment noted (see DEIR section on Vegetation).

F-67

Comment: Despite its small size, partial loss of the original blue oak cover, and recent encroachment by industrial development on city park land, the blue oak savanna north of Longview Drive still provides the best example within Del Paso Regional Park of the two tiered oak-grass community which typified the Sacramento region less than a half century ago. Blue oaks have become established here within the last twenty years despite widespread establishment failure of this species in rural areas throughout the past century. This region is extensively patrolled by raptors, it is a nesting area for game birds (quail, grouse, pheasant), and is probably important for night-time foraging by animals like grey fox which seek shelter within the dense riparian vegetation along Arcade Creek during the day. Creating a natural habitat area here would mitigate for the physical loss of restorable blue oak savanna resulting from construction of the sports complex-2 plan. (Steve Talley for ACRP)

Response: Comment noted. See response to comment F-8.

F-68

Comment: The grassland east of Norris Swale appears to have been the site of a well developed oak woodland. Copious oak regeneration in this area today probably heralds the natural reestablishment of this woodland after years of plowing and mowing. If this area was granted natural habitat status and added to the natural habitat areas along and north of Arcade Creek which have already been designated in the Master Plan an approximate 45-acre shelter for wildlife would eventually develop in this area. We believe this "East Del Paso Natural Area" could mitigate for the degradation of wildlife values on the floodplain and terrace area just north of sports complex-2. (Steve Talley for ACRP)

Response: Comment noted. This mitigation suggestion is more in keeping with the response to Comment F-8. A 45-acre contiguous "shelter" would provide a significant wildlife area.

F-69

Comment: The sports complex 2A or 2B plans would allow the two largest and least disturbed vernal pools to be saved and would allow sufficient annual grassland between softball field #3 and the heritage oak area to landscape a vernal pool watershed to replace the current watershed which will become the athletic complex. Since the soils southeast of the largest vernal pool (pool #1) are not likely to be different from the vernal pool area, a feasibility study to restore vernal pools in this area should also be commissioned. Whether or not vernal pools can be restored to the area north of field #3 a buffer drainage system should be created to deflect summer irrigation runoff from the athletic complex away from the vernal pools. Soil to produce this buffer and to landscape a new vernal pool watershed would come from the excavation excess produced by grading the athletic complex site (Table 1). (Steve Talley for ACRP)

Response: Comment noted. No response necessary.

Oral Comments

F-70

Comment: A good mitigation measure to implement during construction, to prevent compaction by heavy equipment or storage of heavy construction materials, is to install fencing 40 feet out from the dripline of oaks that are to be retained. (Jim Trumbly)

Response: See response to comment F-31.

F-71

Comment: This project gives us the opportunity to save a regenerating oak area which may lead to a large number of oaks in the park one day. I am not in favor of the Sports Complex 1 design because the regenerating oak area is covered by the parking lot. The fact that the City has declared 1985 The Year of the Oak also seems significant. (Jim Trumbly)

Response: Comment noted. No response necessary.

F-72

Comment: I made a personal inspection of the area where the "vernal pools" are supposedly located. There are two areas where water is currently standing near the proposed sports complex site. There is one depression on top of the hill west of the sports complex site which was formed due to the dumping

of gravel in this area. The area south of the existing tree nursery where soil was excavated to make terraces for planting rows of trees also has standing water. This man-made area is what the vernal pool controversy is based on. (Gene Robinson City Park Superintendent)

Response: Comment noted. No response necessary.

F-73

Comment: The question of whether the vernal pools are manmade or not is irrelevant. The climate and soil are the factors that have allowed the vernal pools to form. Vernal pools are rare in the Sacramento Valley and should be protected in Del Paso Park. (Dennis McQuen for ACRP)

Response: See DEIR (pages 54-58) for discussion of rarity of vernal pool habitat in Sacramento County and response to Comment F-2 for further comments on the vernal pools on-site.

Section G: Water Quality, Drainage, and Flood Control

(Except for typographical corrections,
all comments are verbatim)

G-1

Comment: The analysis of the impacts of the parking lot must include, at a minimum, vegetational and wildlife impacts (Nancy Lindsay), runoff and the effects of runoff on the water quality of Arcade Creek (Nancy Lindsay), and the tradeoffs between different sized parking lots and the environmental destruction resulting from the different sized parking lots. In order to evaluate the tradeoffs, a justification for the different sizes of parking lots is necessary. (Nancy Lindsay)

Response: The impact of parking lot runoff on Arcade Creek is essentially unmeasurable. Arcade Creek presently drains a large urbanized area containing many roads, parking lots, and other impervious surfaces. Water quality already exhibits these impacts from other sources. The parking lot runoff may contribute additional contaminants that are present in Arcade Creek. From a cumulative standpoint, the additional paved surface will probably have a slight, but unmeasurable, adverse impact on Arcade Creek water quality. It is not possible to use water quality tradeoffs as a basis for evaluating alternative parking lot sizes.

G-2

Comment: Parking Lot Drainage: Explain how the new parking lots can be built and the Renfree lot retrofitted with complete drainage systems to prevent sheet runoff and soil erosion. (Tim Vendlinski for ACRP)

Response: Design drawings showing drainage details have not been developed. Erosion does not seem to be a problem at the existing Renfree Field parking lot. Sheet runoff is the best way to drain the fields. Parking lot drainage can be intercepted in storm drains and piped to the creek, or drained by sheet flow and valley gutters to the low end of the lots and carried via grassed swales to the creek. Slope protection may be needed where it flows down the steep sides of Arcade Creek.

G-3

Comment: Toxic Discharges: Determine point sources of toxic waste discharge into Arcade Creek from outside park bound-

aries and recommend legal action the city can use to eliminate such discharges. Of immediate concern are sewage odors emanating from the swale crossing the Junior Museum property and the paint/solvents entering the creek from the large concrete culvert passing under Longview Drive between Airport and Industry Drive. (Tim Vendlinski for ACRP)

Response: The Central Valley Regional Water Quality Control Board has the legal responsibility to enforce laws relating to discharge of pollutants to these waters. The Board has been contacted regarding the two water quality problems mentioned above (McKinley pers. comm.).

Section H: Traffic and Circulation

(Except for typographical corrections,
all comments are verbatim)

H-1

Comment: Watt Avenue traffic is already annoyingly heavy on its entire length, and will continue so, even with addition of another lane in this vicinity. What is the stated traffic capacity for Watt in the Longview area? (Betty Matyas for CNPS)

Response: Because one of the most critical elements of roadway capacity is the level of service (LOS) at intersections, the EIR traffic impact analysis focused on intersection capacity along Watt Avenue. As shown in Exhibit H-6 of the DEIR, the Watt Avenue/Longview Drive intersection currently operates at LOS A (59 percent of its capacity) during the P.M. peak hour.

H-2

Comment: Peak traffic figures on an average day, but not peak at competition times have been addressed. Figure H-3 shows a total of 190 cars turning onto Longview from Watt at peak time on an average day. Then why have 800 parking spaces? How often will 800 spaces be used, and what will it do to congestion at Watt and Longview? Will a left turn lane on Watt be adequate? (Betty Matyas for CNPS)

Response: The DEIR focused on traffic conditions during the weekday P.M. peak hour since this hour is expected to represent the highest hourly volume of project-generated plus street traffic. Thus, although parking demand during weekend national and regional tournaments is expected to justify a ±800-space parking lot, peak street volumes are not expected to occur during such tournaments since (nonproject-related) weekend traffic volumes are much lower than weekday volumes.

National tournaments are expected to occur approximately once per year. Such tournaments are expected to require ±800 spaces. Regional tournaments, which are expected to occur every weekend for 8-9 months of the year, would require up to ±600 parking spaces (Kelley pers. comm.). The Watt Avenue/Longview Drive intersection is expected to be able to accommodate this additional weekend traffic without the addition of any lanes.

H-3

Comment: Figure H-4 shows 30 more cars proceeding north on Watt from the Auburn intersection with as opposed to without the project, but at Longview 100 cars are turning left. Where did the extra 70 cars come from in this short distance? (Betty Matyas for CNPS)

Response: These trips are expected to exit the Business 80 northbound off-ramp to northbound Watt.

H-4

Comment: Bridging the creek, and also paralleling it, would be undesirable because of loss of wildlife and vegetation on both sides of the creek. (Betty Matyas for CNPS) A dangerous horse-car conflict would be present. (Betty Matyas for CNPS) The traffic figures for the Watt-Longview intersection have been underestimated, and traffic would clog on both streets. (Betty Matyas for CNPS)

Response: The existing traffic volumes at the Watt Avenue/Longview Drive intersection shown in Figure H-3 are based on manual counts taken on November 3, 1984. Projected 1995 volumes at this intersection are based on the trip generation estimates presented in Exhibit H-7 and the distribution shown in Exhibit H-8. Since this comment does not suggest specific deficiencies in the DEIR traffic impact analysis, no specific responses can be provided here.

H-5

Comment: Justify the Need for Paved Parking: ACRP applauds Jones & Stokes Associates recommendation to use shuttle service from the light rail terminal and motels on Auburn Boulevard to transport large numbers of players and spectators to the softball complex and thus reduce the need for paved parking around the complex. Parking lot size on the three alternatives seems quite arbitrary (400, 700, and 800 car lots). Determine how many parking spaces can be reduced by the vigorous use of mass transit, explain the optimum parking lot size, and justify the suggested parking lot. (Tim Vendlinski for ACRP)

Response: If shuttle bus service was provided between the parking lots of the proposed light rail transit (LRT) station at the I-80/Watt Avenue interchange and the sports complex, it is possible that the number of spaces provided at the sports complex lot could be reduced. Use of the LRT parking lot by sports complex users would be most practical during annual national tournaments when peak parking accumulation is expected to justify an ±800-space lot. With the exception of national

tournaments, peak parking demand at the sports complex lot is expected to range from 500 to 600 spaces during weekend regional tournaments. If the LRT lot was used to accommodate overflow parking demand during national tournaments, then the sports complex parking lot could be reduced by up to 200 spaces. Further study and coordination with Regional Transit is needed to determine the feasibility of such an arrangement.

H-6

Comment: Thank you for the opportunity to review the subject DEIR. In my opinion, the document is complete and adequately identifies potential air quality and traffic related impacts that would result from any of the proposed project alternatives.

The expansion of the park to include a sports complex and increased natural habitat areas, along with greater mixed use, will in the long term be of significant benefit to the Sacramento Metropolitan Area. A regional park located within the urban area will in future years allow for shorter trip lengths for park users, who would be required to drive much further distances to other regional facilities. Secondly, a well designed and maintained park is vitally needed by residents of the north central urban area, and may encourage greater use of bicycles by park users with attendant air quality and traffic congestion benefits. (Sacramento County Air Pollution Control District)

Response: Comment noted. No response necessary.

H-7

Comment: The present plan depicts traffic volume increases primarily after 5:15 p.m., Monday through Friday, with the majority of the traffic heading toward the park area. Although the figure predicted for the traffic increase may be totally correct, it is my contention that summer daytime traffic has not been properly considered, nor has the traffic from the air base during peak periods, including lunch hour. All this traffic will pose a safety problem for employees working in any of the businesses on Longview Drive. (Larry Patterson for Exploration Logging, Inc.)

Response: The DEIR traffic impact analysis considered the weekday P.M. peak hour of 5:15 P.M.-6:15 P.M. because this hour is expected to have the highest hourly volume of existing plus project-generated traffic. The proposed project is not expected to generate traffic during weekday midday periods. Existing commute traffic (P.M. peak period) generated from McClellan Air Force Base in the vicinity of the project site has been accounted for in the existing traffic counts presented in Exhibits H-1, H-3, and H-4.

H-8

Comment: Secondly, because of this increase in vehicles, I would recommend that the access road be placed in the vicinity of Industry Road, a distance away from the businesses, thereby reducing the possibility of traffic stopping dead in the roadway waiting to make a turn into the park and causing a hazard to all other traffic. (Larry Patterson for Exploration Logging, Inc.)

Response: Access Road B, as proposed, would enter the park in the vicinity of Industry Road. However, as noted in Sections D and F of the DEIR, this access road proposal would adversely impact the Horsemen's Association and riparian vegetation along Arcade Creek.

Access Roads A and C are proposed to enter the park in the vicinity of Airport Drive. These alternatives are not expected to adversely impact through traffic using businesses on Longview Drive.

Section I: Air Quality

No comments received.

Section J: Noise

No comments received.

Section K: Aesthetics

(Except for typographical corrections,
all comments are verbatim.)

K-1

Comment: Landscape Del Paso Park Master Plan developments with native plants: Jones & Stokes Associates wisely recommends preserving existing oaks and utilizing native landscape as a wildlife and aesthetic mitigation measure--particularly for the athletic complex and parking areas. We concur and would extend this recommendation to include the day use recreation and neighborhood park area.

Because of its proximity to the vernal pool and Arcade Creek terrace areas, the arboreal landscape within the softball complex should be confined to blue oak (Quercus douglassii) with only occasional valley oak (Q. lobata) and interior live oak (Q. wislizenii). Understory species should be compatible with both oaks and full sun as it will take several years for adequate shade to develop. Planting within the parking area could be any, preferably all, of the local oak species. Trees should not be placed in a regular pattern except within the parking area where this is unavoidable.

Arboreal landscape within the grassland between Renfree Field and Norris Swale should be a mixture of valley, blue, and interior live oaks. Valley oak and interior live oak should predominate near Arcade Creek and blue oak should be planted near Auburn Blvd. Understory planting should take care not to create security problems and should emphasize native species which serve as valuable forage for desirable wildlife. (Steve Talley for ACRP)

Response: Comment noted. No response necessary. The suggestions will be considered in planning the final design of the project.

K-2

Comment: Revegetate nonirrigated rough within Haggin Oaks Golf Course to form aesthetic and wildlife "islands": Thus far the Del Paso Regional Park mitigation package has dealt with only preserving existing functional natural habitat areas within the park (items 1-3), or has suggested how the small vernal pool area could be enhanced (item 4), and has shown that aesthetics can be improved and the transition between passive (natural

area) and active use areas dampened by use of native species in the latter. Some forage is also provided for smaller animals which are prey for more sensitive wildlife elements through native plantings in active use areas. These mitigation measures do not directly address the most critical land use problem posed by the Del Paso Regional Park Master Plan -- the loss of significant natural habitat to active use development in direct violation of city and county policy suggesting such areas are valuable and should be preserved.

It is serendipitous for everyone interested in the future of Del Paso Park that the eastern half of Haggin Oaks Golf Course contains an exceptional amount of very poorly landscaped unirrigated rough between fairways. ACRP has not yet calculated the amount of land classified as unirrigated rough but it is at least equivalent to the lands proposed for development in the master plan. Today these areas have virtually zero aesthetic value and are of only marginal wildlife value. (They support hordes of jackrabbits which are apparently free of predators.) ACRP recommends landscaping these barren areas with locally native plant species of proven aesthetic and/or wildlife value as the most important single act the city can undertake to render the developments contained within the master plan consistent with their own policies and objectives. Figure 1 suggests how this could be done to both increase aesthetic and wildlife values and make the game of golf a little more interesting at Haggin Oaks.

Foremost we point out the irrigated fairways where exotic landscape has flourished are to be retained. Around each rough area a buffer zone of mowed annual grassland would also be retained. Inside this area annual grasses would not be mowed and smaller shrubs and sublinguous shrubs (Salvia, Minimus, Lupinus, Eriogonum, etc.) would be encouraged. Inside the grassland subshrub belt would be a zone of medium and large shrubs (Rhamnus, Ceanothus, Arctostaphylos, Prunus, Cercis, Heteromeles, Aesculus, etc.). Within the center of each rough area and over a significant area of the largest unirrigated areas would be a zone of native trees adapted to uplands (the three native oaks and, possibly, oracle oak (Q. morchus) and digger pine (Pinus sabiniana) in addition to appropriate small trees, shrubs, and subshrubs. As the jackrabbit populations of these areas came under full control (they are not a problem at nearby Bushy Lake where grey fox and coyote are common) an effort could also be made to improve the value of grasses and forbs within the islands.

Native landscaping within Haggin Oaks Golf Course would add the increasingly popular primitive aspect to the course and be aesthetically pleasing. While the landscape could not be directly appreciated by motorists on Business 80, spectators and contestants at the athletic complex, and people visiting the natural area, it would be of definite aesthetic value to these user groups. The restricted access would be beneficial to

wildlife which might seek daytime shelter within the relative security of the occasional tree and shrub thickets. Since red-tailed hawks primarily forage for prey from roosts we recommend placing old telephone poles in the centers of the larger rough areas until the arboreal vegetation, particularly digger pine, have become large enough to fulfill this purpose. ACRP considers the revegetation of Del Paso Golf Course rough to be the most essential component of the mitigation package to compensate for the wildlife habitat lost to the developments suggested in the Del Paso Regional Park Master Plan. (Steve Talley for ACRP)

Response: The enhancement of the vegetation and wildlife habitat of the golf course roughs offers an interesting concept and is an opportunity that warrants more detailed study. Such a study should be undertaken as part of an overall resource management plan for the park. The vegetation species chosen for the enhancement need to be chosen to fulfill specific vegetation, wildlife management, recreation, aesthetics, etc., goals. The objectives for the roughs need to be coordinated and integrated with the mitigations and enhancement features chosen for the projects under study as well as for future or ongoing projects (e.g., Science Center, Children's Home, etc.). Decisions and trade-offs must be made to prioritize objectives. Open grasslands must be managed for in one area and woodland in another if plant and animal species that are supported by the different vegetation types are to be retained and increased on-site.

The areas designated as natural areas and proposed natural areas in the master plan should receive the first priority in any management plan. The enhancement of these areas through good management planning can provide significant mitigation for the impacts of the proposed projects. While these areas are "natural areas", they are not receiving the protection and active management that could improve their ability to support native plants and animals. Most of these areas are (or could be) contiguous with Arcade Creek, which vastly improves their overall usefulness as wildlife habitat.

Good management of the natural areas could compensate for the losses due to proposed projects (assuming the parking lot of Sports Complex 1 is moved to the southern end of the facility). The addition to the enhanced natural areas of the lands proposed for the neighborhood park would provide even further assurance that vegetation and wildlife values would be gained, not lost, in the overall recreation facility development/natural resources enhancement combined program. Any changes in the golf course rough vegetation should be investigated as a second priority in the overall management plan. The second place standing is suggested because at least some of the rough would be small, isolated islands not tied to larger parcels of natural habitat or to the riparian corridor.

K-3

Comment: In summary, we recommend that: that natives be used exclusively in landscaping, (Betty Matyas for CNPS)

Response: Comment noted. No response necessary.

K-4

Comment: Landscape Park With Native Vegetation: Landscape the athletic complex, day-use recreation area, neighborhood park and the new/restored parking lots with native plant species. This element was recommended to the city by Jones & Stokes Associates environmental assessment team. (Tim Vendlinski for ACRP)

Response: Comment noted. No response necessary.

K-5

Comment: Restore Damaged Habitat by Landscaping Golf Course With Natives: Landscape the unirrigated rough within the eastern half of Haggin Oaks Golf Course with locally native vegetation to create aesthetic wildlife "islands". (Tim Vendlinski for ACRP)

Response: Comment noted. Revegetating the unirrigated rough on the eastern half of Haggin Oaks Golf Course with native vegetation would improve the aesthetics. The value of this revegetation to wildlife would depend on the wildlife species that are desired within the park. Revegetating the roughs with trees and bushes would provide habitat for a greater variety of species, but the type of habitat that is being displaced by the project, oak savanna, would not be replaced.

Section L: Light and Glare

(Except for typographical corrections,
all comments are verbatim)

L-1

Comment: Reference to light and glare problems on pages 28 and 113 does not include an analysis of the effect, if any, on flight operations at McClellan AFB. This issue should be discussed in the Final EIR. (SACOG)

Response: Light and glare generated from the project site is not expected to have any significant impact on the flight operations at McClellan AFB since the flight paths would be so far above the site and since the lights can be shielded and directed to avoid any problems.

Section M: Public Services and Utilities

(Except for typographical corrections,
all comments are verbatim)

M-1

Comment: Emergency vehicles would have difficulty entering from Watt in times of heavy traffic. For safety there may need to be more than one access route. One might be for emergency vehicles only. (Betty Matyas for CNPS)

Response: Comment noted. Emergency vehicle access is recognized as a problem (page 128 of the DEIR) and mitigation measures are suggested to provide this access (page 129 of the DEIR).

M-2

Comment: The report suggests that to mitigate the problems, barriers could be put in to prevent parking along the access road. The solution sounds simple and effective, but there are several oversights. First, the "long winding road" is stated as being the cause of accidents and congestion, therefore, how can barriers prevent accidents? "Road configuration" is said to cause parking on the road. Barriers may prevent that, but I doubt it. Every day the police find people parking beside barriers and under "No Parking" signs designed to discourage parking. (John Jones for SHA)

Response: The mitigation measure referred to above is found on page 129 in the DEIR. The report recommends the installation of post and cable barriers (not "No Parking" signs) along the access road (A,B,C) to prevent roadside parking. This mitigation measure would mitigate congestion problems and avoid impacting biological resources. The report does not connect the barriers with the prevention of accidents. However, to the extent that congestion is minimized, some accidents may be avoided.

M-3

Comment: SMUD Power Line: SMUD 16,000 volt power line may have to be relocated (see reference page 39), but relocation is not considered a significant impact. Discuss methods of line

relocation and adverse impacts. Will the line be buried or removed? ACRP suggests that if the line is buried, trenching in the regenerating oak woodland would kill both young and heritage oaks. (Tim Vendlinski for ACRP)

Response: At the present time, it is uncertain whether the line, if it needs to be relocated, would be above or below ground (Pearson pers. comm.). It is unlikely, however, that the line would be buried, due to the high cost involved and environmental concerns.

Section N: Cultural Resources

(Except for typographical corrections,
all comments are verbatim)

N-1

Comment: Our analyses suggest the access route favored by Jones & Stokes could have severe adverse impacts upon the park's larger wildlife (grey fox, red-tailed hawks) because the terrace traversed by this road would be the largest of only two significant foraging areas left in the park after developments contained in the master plan were completed. The Arcade Creek terrace west of Watt Ave. is also the site of the park's largest heritage oaks, it possesses the largest continuous area of oak reproduction in the park (and in surrounding areas) (Steve Talley for ACRP), it is a first order open space asset with considerable aesthetic value (Steve Talley ACRP) and is the central component of the largest parcel remaining from Rancho del Paso outside of the American River Parkway. Rancho del Paso was once 44,000 acres and was nationally famous as a horse breeding ranch under the ownership of James Haggin in the late nineteen hundreds. These latter data are from the EIR but they were not included in the impact summary underscoring the problems with this Draft EIR. (Steve Talley ACRP)

Response: The information referred to above is discussed in the DEIR in Section N, Cultural Resources (pages 131-132). While the above items are not specifically mentioned in Section C, Summary of Findings, the Summary Table (page 31) does state that cultural resources may be adversely affected by the proposed project. This was identified as a potentially significant impact and mitigation was suggested.

N-2

Comment: A review of the Draft EIR indicates that while no prehistoric sites were located within the project boundaries, there is a possibility that Native American cultural resources may exist near Arden Creek. As a result, we strongly recommend that a Native American observer as well as a qualified archeologist be present during construction. If requested, we will provide a list of those groups or individuals who have expressed their interest and are of the appropriate heritage to the project area. In the meantime, we would suggest that you contact William J. Franklin, P.O. Box 4, Sloughhouse, CA. 95683,

telephone number (916) 351-0848 for initial consultation on your project. (Native American Heritage Commission)

Response: A certified archeologist would be able to identify any Native American artifacts uncovered during construction. If any such artifacts are found, the Native American Heritage Commission should be consulted.

N-3

Comment: In summary, we recommend: as much land as possible be left natural in order to keep the amount of introduced species lower, and because this land is the last undeveloped portion of Rancho Del Paso, which makes it an historic consideration. We feel that natural areas have as much historic value as those remembered for human inhabitation. (Betty Matyas for CNPS)

Response: The DEIR in Section F, Vegetation and Wildlife (pages 60-62) suggests numerous mitigation measures which would minimize or avoid impacts on native vegetation.

N-4

Comment: Preserve Natural Open Space North of Longview: Preserve the vanishing blue oak woodland/savanna north of Longview Drive (west of the Senior Gleaners) and restore the 1940 WPA bridge.

Response: Restoration of the 1940 WPA bridge was not discussed in the DEIR because the bridge is outside of the study area for the Master Plan Implementation Program and would not be in any way impacted by the proposed park development. Restoration of the bridge would not provide mitigation for any of the impacts of the proposed improvements.

N-5

Comment: Wanted to comment on the historical significance of horsemen in Sacramento. The grant was made by Haggin to the City of Sacramento 80 years ago with the understanding that it would be used for recreational purposes. Horse trails were to be a part of the recreational uses. These trails have been encroached upon by every development within Del Paso Park.

Response: Comment noted. No response necessary.

Section O: Cumulative Impacts

(Except for typographical corrections,
all comments are verbatim)

O-1

Comment: I requested the City to address the cumulative impacts of the proposed park developments in relation to each other as well as in relation to the city and county of Sacramento. The DEIR does not address either of these impacts. At a minimum, the Final EIR must address the following:

- 1) Identify and evaluate the cumulative impacts of developing all of the proposed improvements with respect to vegetation, wildlife, water quality, drainage, flood control and aesthetics. For example, foraging area will be reduced by construction of the sports complex, parking lot, access route, DURA and neighborhood park. What will be the overall impact on the foraging area and can the remaining lands sustain the current wildlife population? Another example: If the parking lot for Sports Complex 1 "... will constrict the flood-carrying capacity of the floodplain, and increase the water surface elevation upstream of this location" (page 74, paragraph 2, line 9), how will the developments in East Del Paso Park be affected? Mitigation measures for the cumulative impacts must also be identified in the Final EIR. (Nancy Lindsay)

Response: See Section 2, Key Revisions, of this FEIR.

O-2

Comment: When the City Council adopted the final conceptual master plan in March, 1983, it did so with the provision that the DURA and neighborhood park would be the last improvements to be developed and that development of these units would be reconsidered after the other improvements had been developed. This provision is particularly important in relation to cumulative impacts. I believe that wildlife displacement resulting from intensive development in west Del Paso Park will cause the natural habitat area in East Del Paso Park to become even more valuable. Thus, the provision passed by the City Council must be maintained and enforced as a mitigation measure for cumulative impacts. (Nancy Lindsay)

Response: Comment noted. Phasing of developments in Del Paso Regional Park is being considered. Phasing would allow the

City to know the full extent of the impacts of the west area development before committing the east area resources

O-3

Comment: Reaffirmation of Adopted Park Development Policy: When the City Council adopted the conceptual master plan in March 1983, the council mandated that the 13 acre creek terrace lying east of Renfree Field and west of Norris Swale be the last area developed as part of the master plan implementation. While this area doesn't support as much oak regeneration as other park areas, regeneration is occurring on the periphery of the property and correct environmental conditions could produce substantial regeneration in the future. A vast area of blue oak savanna and regenerating oak woodland west of Watt Avenue will be destroyed by developing the softball complex, access road, and parking lot. We urge the City Council to reaffirm its policy and wait to develop the 13 acre terrace until the full environmental impacts of the other park components are completely understood. In this way, the 13 acre terrace will act as a bond to promote sensitive development elsewhere in the park and to guard the ecological integrity of the park's natural open space.

It is quite likely that development of the other park components will combine with conversion of open space outside the park to cumulatively impact the park's vegetation and wildlife and cause an enormous loss of plant and animal diversity. In this case, preservation and restoration of the entire area may be needed to provide the last refuge for our native oaks and abundant wildlife. Please make the reaffirmation of this farsighted policy one of your highest priorities. (Tim Vendlinski for ACRP)

Response: See response to Comment O-2.

O-4

Comment: Discuss the cumulative impact of adding a fifth bridge to this congested network of creek crossings. (Tim Vendlinski for ACRP)

Response: The impact of adding a fifth bridge to the existing network of creek crossings is discussed in Section F, Vegetation and Wildlife, of the DEIR.

O-5

Comment: Cumulative Impacts of Open Space Conversion In and Outside the Park: Discuss the way residential, commercial, and industrial development outside the park combines with park

development to cumulatively impact Arcade Creek's remnant riparian oak woodland/savanna ecosystem. Special attention must be given to the way such natural areas in this region have been converted to urban uses, the rarity of the remaining systems, and the increasing pressures to convert these last areas to residential, commercial, industrial, or recreation development. This discussion should begin by addressing how the following developments reduce the chance that oaks and the wildlife they support will be able to survive in this region: Senior Gleaners expansion and suggested development north of Longview Drive, the Benvenuti office development on Auburn Boulevard north of the I-80 intersection, development of the AT land by Forrar Williams Architects on Auburn Boulevard perpendicular to the I-80 intersection, the upcoming construction of the Stanford Children's Home on a 30-40 acre parcel of creek terrace along Winding Way west of Auburn Boulevard, and the implementation of the Del Paso Regional Park Master Plan. (Tim Vendlinski for ACRP)

Response: See Section 2, Key Revisions of this FEIR.

O-6

Comment: Riparian Easement: ACRP urges the City Council to order Parks and Community Services to assume management of 4.5 acres of Forrar Williams riparian easement (offered to the city) to maintain as natural habitat and thus help mitigate for the downstream loss of riparian forest caused by access road construction. (Tim Vendlinski for ACRP)

Response: Comment noted. No response necessary.

Persons Making Oral Comments on the DEIR
November 28, 1984 Hearing

<u>Name</u>	<u>Affiliation</u>
John Jones*	President, Sacramento Horsemen's Association
Steve Cates*	Environmental Council of Sacramento, Inc.
Joel Hessing	President, Greater Sacramento Softball Association
Tim Vendlinski*	Chair, Arcade Creek Restoration Project
Ann Taylor	Member, Sacramento Horsemen's Association
Rose Stinson	Player Representative, Amateur Softball Association of Metropolitan Sacramento
Deni Treaster*	Golden Seniors Softball Club
Steven Talley*	Arcade Creek Restoration Project
Jim Trumbly	
Alta Tura*	Conservation Chair, Sacramento Audubon Society
William Gubel*	Deputy Umpire, Chief Amateur Softball Association
Gene Robinson	City Park Superintendent
Stan Upigard*	Board Member, Sacramento Horsemen's Association
Dennis McQuen	Arcade Creek Restoration Project

*These commentors also submitted written comments.

Oral comments not submitted in writing are summarized and are responded to in this Final EIR.

Section 4

ERRATA

p. 3, paragraph 1, line 2, should be amended as follows:

"Business 80 bisects the park."

p. 8, paragraph 7, line 1 should be deleted.

p. 17, insert after paragraph 1:

"o The sports complex, parking lot, and access road developments would be relatively permanent, so they would constitute irreversible environmental changes."

p. 35, paragraph 2, line 6 should be amended as follows:

"A bridge crosses Arcade Creek in this area."

p. 36, insert paragraph 4 (under Assessment of Consistency):

"Potentially Inconsistent: The sports complex is a high intensity use, but strategic placement of the facility could avoid significant impacts on the natural or native environment."

p. 38, insert after paragraph 7:

"Noise from the sports complex may also disturb natural area users along the creek."

p. 42, insert paragraph 2:

"The creek would no longer act as a barrier between the park and the SHA facility if the bridge proposed on Access Road B is installed. This could result in a safety problem because unsupervised children who visit the park may wander to the SHA facility to see the horses. This could result in horse-inflicted injuries.

An access road through the SHA facility will have an impact on its potential for gaining revenue. The desirability of the clubhouse for special occasions will be reduced because of the traffic on Access Road B. The use of the small arena for shows will be eliminated because of the proximity to traffic. Covering this small area was expected to generate revenue by encouraging horse

shows during the rainy season. This potential for revenue generation would be eliminated by Access Road B.

Membership may be reduced because of the decrease in aesthetic value and the elimination of the small exercise arena caused by Access Road B."

p. 42, insert after paragraph 6:

"No Project Alternative

The No-Project Alternative would not entail further development on the project site, so no land use impacts would be anticipated."

p. 42, paragraph 7, should be amended as follows:

"If the distance between the softball complex and the golf course is not adequate to ensure safety then either a fast growing native vegetative barrier . . ."

p. 44, insert after paragraph 4:

"Locate the Sports Complex as Far From the Creek as Possible (1, 2, 3)

In order to minimize noise impacts on the natural area users along the creek, the sports complex should be located as far to the south of the creek as is feasible.

Redesign the Eastern Portion of the Golf Course to Reduce Hazards (1, 2, 3,)

The eastern portion of the golf course could be redesigned to lessen potential hazards.

Provide a Visual Barrier Between SHA Facility and the Access Road (B)

A wooden fence or a fast growing native hedge would provide a visual barrier between the access road and the SHA to reduce its hazard as an attractive nuisance.

Redesign the Access Road to Avoid Impacts on the SHA Facility (B)

The only way to fully mitigate the impacts on the SHA facility that would result from the implementation of Access Road B would be to redesign the access road to avoid the SHA facility area."

p. 49, insert after paragraph 2:

"No-Project Alternative

The No-Project Alternative would not entail further development on the project site, so no soils impacts would be anticipated."

p. 60, paragraph 3 should be amended as follows:

"The development of the day-use recreational area and neighborhood park may disturb two areas of oak regeneration: (1) the swale midway between Renfree Field and the existing neighborhood park at the east end of the park, and (2) an area just west of the existing neighborhood park."

p. 82, paragraph 4, line 8, should be amended as follows:

"In order to drive from the sports complex to the LRT terminal, persons would have to drive from Longview Drive, right on Watt Avenue, left on Auburn Boulevard, and enter I-80 westbound, a total distance of approximately 2 miles."

p. 97, insert after paragraph 2:

"No-Project Alternative

The No-Project Alternative would not entail further development on the project site, so no air quality impacts would be anticipated."

p. 107, paragraph 1, line 4, should be amended as follows:

"The only existing uses in the park east of Watt Avenue are the Children's Receiving Home, the Sacramento Science Center and Junior Museum, and Renfree Field."

p. 107, paragraph 1, line 8, should be amended as follows:

"The western portion of the park consists of the Haggin Oaks Municipal Golf Course, as well as several leased facilities such as the Sacramento Trap Shooting Club, the Sacramento Horsemen's Association and the Senior Gleaners."

p. 113, paragraph 2, should be amended as follows:

"Two factors determine the amount of light that an object receives . . ."

p. 115, paragraph 3, insert after line 1:

"Increased light levels along Access Road B would impact activities held at the SHA facility."

p. 116, insert after paragraph 2:

"Use a Barrier to Reduce Light Impacts on SHA Facility (3)."

A wooden fence or a dense native hedge would reduce the impacts that car headlights from Access Road B would have on SHA activities."

p. 125, paragraph 2, should be amended as follows:

"Relocation of the 69 kV line is discussed in Section D, Land Use."

p. 124, paragraph 4, line 6, should be amended as follows:

"SMUD has a 69 kV transmission line traversing the sports complex area."

p. 127, paragraph 4, should be amended as follows:

"No-Project Alternative. The No-Project Alternative would not entail development on the project site, so no impacts on fire service would be anticipated."

p. 129, insert after paragraph 1:

"Implementation of Access Road B may result in off-road parking on the SHA property. The bridge over Arcade Creek proposed by Access Road B could encourage parking in the SHA barn area when the parking lot is full because of the easy access to the sports complex."

p. 130, insert after paragraph 1:

"Require Rigorous Police Enforcement of Illegal Parking (B)."

If Access Road B is implemented, rigorous police enforcement of illegal parking in the SHA barn area would be necessary to discourage use of this area as an overflow parking lot."

p. 131, paragraph 1, line 8, should be amended as follows:

"The tribes of this whole region referred to themselves as Nisenan . . ."

p. 135, insert after paragraph 2:

"No-Project Alternative

The No-Project Alternative would not entail further on-site improvements, so no impacts on cultural resources would be anticipated."

Section 5

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- Newton, I. 1979. Population ecology of raptors. Buteo Books. Vermillion, South Dakota.
- Schoener, T. W. 1968. Sizes of feeding territories among birds. Ecology. 123-141 pp.

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- Anderson, John. December 11, 1984. Executive Director. Sacramento Science Center and Junior Museum. Telephone conversation.
- Hanson, Eric. December 11, 1984. Engineer. District 3, California Department of Transportation (Caltrans). Telephone conversation.
- Jones, John. December 7, 1984. Sacramento Horsemen's Association. Telephone conversation.
- Kelly, Larry. December 12, 1984. City of Sacramento. Department of Parks and Community Services. Telephone conversation.
- Knudsen, Monte. December 14, 1984. U. S. Fish and Wildlife Service, Sacramento Endangered Species Office. Telephone conversation.
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Talley, Steve. December 11, 1984. Arcade Creek Restoration Project. Telephone conversation.

Tugel, Arlene. December 12, 1984. Soil Scientist. U. S. Soil Conservation Service. Telephone conversation.

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Section 6

COMMENT LETTERS

Talley
Working Copy

Arcade Creek Restoration Project
4347 Stollwood Drive
Carmichael, CA 95608
(916) 961-7566

November 8, 1984
CITY OF SACRAMENTO

NOV 9 1984

DEPARTMENT OF
COMMUNITY SERVICES

Mr. Robert P. Thomas, Director
Parks and Community Services
City of Sacramento
3520 Fifth Avenue
Sacramento, CA 95817

RE: Draft EIR for Del Paso Regional Park Master Plan

Dear Mr. Thomas:

I have reviewed the Draft EIR referenced above for the Airport Land Use Commission (ALUC) and have the following comments:

1. Reference to the ALUC's overflight zone recommendations on page 19 and 39 of the Draft EIR state that the ALUC's concerns within this zone are mainly noise related. This statement is incorrect. As indicated in my letter of October 2, 1984 to Ms. Barbara Bonebrake on the notice of preparation for the environmental study (copy enclosed), it is "the safety implications of the placement of new facilities within the overflight zone (which) should be addressed in the EIR." The Draft EIR has not addressed the safety issue. (SALOG) **D/1**
2. Reference to light and glare problems on pages 28 and 113 does not include an analysis of the effect, if any, on flight operations at McClellan AFB. This issue should be discussed in the Final EIR. (SALOG) **L/1**
3. There is no indication in the Draft EIR that officials at McClellan AFB have been contacted regarding the project or given the opportunity to review the Draft EIR. McClellan officials should be given this opportunity if they have not already. (SALOG) **D/2**

I would be happy to discuss these issues further with you or the EIR consultant. Please call me if I can be of assistance.

Sincerely,

Gary B. Keill

GARY B. KEILL
Planner II

GBK:bb
Enclosure

RE: Del Paso Regional Park Master Plan Draft EIR

The Del Paso Regional Park Draft EIR was completed on Nov. 6, 1984 by Jones and Stokes and Associates and the City of Sacramento. Director of Parks and Community Services Mr. Robert P. Thomas has signed off on the document which discusses development of existing natural areas within the park to provide an athletic (softball) complex, day use recreation area, and neighborhood park. The document does not meet Arcade Creek Restoration Project (ACRP) standards for many reasons. Some of the major objections are discussed below.

The city's proposal for an athletic complex is environmentally destructive in that it would destroy the largest stand of regenerating oak woodland and savanna in our region to gain little more than a large (700 car) parking lot. Even with this size parking area the lack of overflow parking capacity would imply some illegal parking in what little natural area remained under this palm. Moreover, the siting of the athletic complex itself would needlessly wipe out remnant vernal pools on the uplands adjacent to Arcade Creek. *(Steve Talley for ACRP)* **F/1**

The City of Sacramento did offer two alternatives to their softball complex but their drawings were so grossly inaccurate and their scale so questionable they could not be analyzed. Possibly as a result of these bad data inputted to Jones and Stokes the Draft EIR is so inadequate in the opinion of ACRP that it cannot be salvaged without a major re-writing. The principal problem is that Jones and Stokes was so misled concerning where the city's alternate routes were actually supposed to go they finally accepted the environmentally destructive access route through the middle of the Arcade Creek terrace as the least objectionable of the three routes analyzed! This conclusion is inexcusable. ACRP presented detailed topographically precise drawings and analysis of alternative athletic complex and access route plans during the Notice of Preparation hearing on Oct. 8th and again in a more detailed letter on the 15th of October. Both of these data packages were available well before the October 19th deadline for inclusion in the Draft EIR. *(Steve Talley for ACRP)* **B/1**

Our analyses suggest the access route favored by Jones and Stokes could have severe adverse impacts upon the park's larger wildlife (grey fox, red-tailed hawks) because the terrace traversed by this road would be the largest of only two significant foraging areas left in the park after developments contained in the master plan were completed. The Arcade Creek terrace west of Watt Ave. **F/3**

F/4

F/5

Del Paso Master Plan Draft EIR
Page 2

is also the site of the park's largest heritage oaks, it possesses the largest continuous area of oak reproduction in the park (and in surrounding areas). It is a first order open space asset with considerable aesthetic value, and is the central component of the largest parcel remaining from Rancho del Paso outside of the American River Parkway. Rancho del Paso was once 44,000 acres and was nationally famous as a horse breeding ranch under the ownership of James Huggin in the late nineteen hundreds. These latter data are from the EIR but they were not included in the impact summary underscoring the problems with this Draft EIR. (Steve Talley ACRP)

ARCP is deeply concerned that a very substantial data base respecting the natural area values and possible mitigation for master plan development was provided to both Jones and Stokes and the City of Sacramento well before the NOP deadline has not been incorporated into the draft EIR. ARCP is now undertaking a detailed analysis of each section of the draft EIR and will provide copies of our assessment to parties interested in testifying at the public meetings scheduled for November 14th and 28th. (Steve Talley ACRP)

Steven N. Talley
ACRP Plant Ecologist

Arcade Creek Restoration Project
4130 Wheat St.
Sacramento, CA 95821
(916) 487-3244 or 961-7564

November 14, 1984

Environmental Assessment Team
Del Paso Regional Park Master Plan
Department of Parks and Community Services
3520 Fifth Ave.
Sacramento, CA 95817

Dear Sir/Madame:

The Arcade Creek Restoration Project (ACRP) is pleased Jones, Stokes and Associates has recognized development of the athletic complex, day use recreation area, and neighborhood park within Del Paso Regional Park is inconsistent with both the city and county policies concerning the purchase and preservation of natural habitat areas. There is, nevertheless, a very special need for softball facilities within the Metropolitan Sacramento Area. For this reason ACRP has endorsed the concept of a softball complex within Del Paso Park if it is designed with major emphasis upon protecting environmental values and it is linked to an innovative mitigation package to preserve and enhance wildlife, plant, and aesthetic values throughout the park.

Unfortunately, the city's proposal for an athletic complex was not environmentally sound and was linked to little, if any, mitigation for severe environmental damage. The City of Sacramento's Plan 1 would have destroyed the largest stand of regenerating oak woodland and savanna in our region to gain little more than a parking lot for 700 cars. Overflow parking would have apparently been in the form of illegal parking in what little natural habitat remained. Moreover this plan would have eliminated remnant vernal pools on the uplands south of the creek terrace while leaving a large tract of land southeast of the complex vacant. Jones, Stokes and Associates appear to recognize these and other problems regarding unmitigatable damage to wildlife, plant, and aesthetic values associated with Plan 1. We anticipate the City of Sacramento will drop this plan.

The City of Sacramento did offer two alternatives for their plan 1 softball complex which would avoid dedicating the Arcade Creek terrace west of Watt Ave. by placing the parking lot on the south instead of north side of the softball fields. However, one of the alternatives (Plan 2) would still destroy the vernal pools. The conceptual drawings for these alternatives were so inaccurate, particularly respecting the access routes, the staff at Jones, Stokes, and Associates appears to have been unable to analyze them objectively. ACRP believes this confusion was what finally led the consultants to conclude the access route directly through the Arcade Creek terrace was less destructive than a route east of the Sacramento Horseman's Association or one paralleling Longview Drive and Watt Avenue. ACRP considers this conclusion inexcusable because they presented topographically precise maps of the Longview Drive access route and discussed the route east of the Horseman's Association well before the Nov. 19th deadline for inclusion of comments into the Draft EIR. We anticipate the City of Sacramento will concentrate its remaining effort and funds upon expanding Plan 2 or 3 (see Appendix 1 for copies of these plans) and will provide Jones, Stokes and Associates with access routes which are both topographically precise and realistic. We hope these data are presented to the public on the evening of November 14th. (Steve Talley for ACRP)

ACRP believes neither the City of Sacramento nor their consultants grasps the central role of environmental mitigation in rendering the proposed developments contained in the Del Paso Regional Park Master Plan consistent with city and county policies regarding the acquisition and preservation of natural habitat areas within their park systems. The remainder of this correspondence will be devoted to summarizing the kind of mitigation package ACRP will be looking for in the Final EIR.

We identify six components to the environmental mitigation package: 1) Combination of the day use recreation and neighborhood parks on the terrace between Renfree Field and Norris Swale, 2) Preserving the oak woodland and savanna north of Longview Drive, 3) Preserving the ecological integrity of the Arcade Creek terrace west of Watt Avenue, 4) Preserving the vernal pools, 5) Landscaping both the athletic complex and day use recreation-neighborhood park with native plants, 6) Landscaping the unirrigated rough within the eastern half of Haggan Oaks Golf Course with locally native vegetation. We emphasize to both the city and their consultants that there is nothing really new in this mitigation package. All the aforementioned suggestions have been set down in writing by ACRP members at one time or another in the course of trying to develop an environmentally sound master plan for Del Paso Regional Park.

1) Combining the day use recreation area and neighborhood park: The Del Paso Regional Park Master Plan called for a 13 acre day use recreation area in the oak savanna east of Renfree Field and west of Norris Swale. A 6 acre neighborhood park was planned for the grassland area with oak regeneration east of Norris Swale. ACRP has noted there is sufficient space in the large grassland west of Norris Swale to locate both a neighborhood park and day use recreation area and that adding the 6 acre area east of the swale to natural habitat already designated in the area by the master plan would produce an approximate 45 acre parcel we call the East Del Paso Natural Area (see ACRP's Oct. 4, 1984 correspondence). We are pleased Jones, Stokes and Associates recognized both the value of retaining the field east of Norris Swale as natural habitat and the relative ease with which the neighborhood park could be integrated with the day use recreation area in the grassland just east of Renfree Field. We anticipate the city will accept the Draft EIR's recommendation. (Steve Talley for ACRP)

2) Preserve the oak woodland and savanna north of Longview Drive: ACRP believes all or most of the oak woodland and savanna north of Longview Drive and west of the Senior Cleaners facility should be preserved as natural habitat, because the region is a restorable example of the upland plant community which once typified the Metropolitan Sacramento Area. It is an important nesting and foraging area for wildlife and contains a 1940 WPA culvert of exceptional quality and aesthetic value. Indeed, the culvert should have been mentioned under cultural resources in the Draft EIR. The region is particularly important to the Del Paso Park mitigation package because it represents a somewhat intact example of the type of habitat which is being lost to development of the athletic complex. Moreover, blue oak woodland and savanna found north of Longview Drive was once the most widespread plant community within Del Paso Park. Today it is the most restricted. Despite these facts and a considerable portfolio of photographs of the area which was given to Jones, Stokes and Associates on Oct. 5, 1984, the Draft EIR contains not a word about this region! This situation should be corrected immediately. (Steve Talley for ACRP)

3) Maintain the ecological integrity of the terrace west of Watt Avenue: ACRP does not understand how Jones, Stokes and Associates determined the access route through the Arcade Creek terrace west of Watt Avenue was less damaging to plant, animal, and aesthetic values than routes around either side of the terrace. Our primary concern respecting the terrace is to retain the region's ecological integrity. We are not that concerned if a route which retains the functional integrity of this region removes a few more mature trees than a route cutting the terrace in two. (Steve Talley for ACRP)

Our analysis of an access route through the creek terrace west of Watt Avenue suggests adverse aesthetic, botanical, and wildlife impacts which would be difficult to mitigate. The terrace is large enough to provide a sense of isolation to those who venture out into the region's western two thirds. Some views within the terrace are almost totally devoid of urban structures. Placing a road through this terrace would shatter this unique aesthetic value. Disturbance during road construction would also tend to introduce weeds and the problem would persist along the shoulder of the road, particularly if it was moved. The most damaging effects could be to wildlife. Beechy ground squirrels, Jackrabbits, striped skunk, and California meadow mouse are common on the terrace. A road through this area would result in many of these animals being struck by autos. Populations of these animals within the park are large and they would not be endangered. However, this is not the case with the larger mammals, raptors, and owls which would be attracted to these carcasses. Only two nesting pairs of red-tailed hawk are known in the park. With the proposed developments the region will probably support only one territory- at least until the mitigation discussed under item 6 is functional. Since the terrace west of Watt Avenue would be the largest foraging area remaining in the park, raptors would concentrate there. The same could be true of the reclusive grey fox which is probably present in the park today and which will only have enough room for one cluster of overlapping home ranges after park development. The problems an access route across this terrace would pose for the park's larger wildlife are summarized by highway wildlife mortality studies which conclude the problem is not serious primarily because of the relatively small portions of a species' range affected by roads. This will not be the case in Del Paso Park after construction of developments contained within the master plan. The situation should not be rendered even more threatening to these larger species by insensitive placement of roads. (Steve Talley for ACRP)

4) Preservation and enhancement of vernal pools: Jones, Stokes and Associates accurately describe the history and current degraded condition of vernal pools in the grasslands west of Watt Avenue. ACRP concurs with Jones and Stokes regarding the necessity of a complete species list from the pools. However, we do not consider vernal pool preservation contingent upon finding endangered or candidate endangered species there. These pools are all that remains of this unique ecosystem within the large open space parcel west of Watt Avenue which possesses both soil and topography suggestive of vernal pools prior to plowing by park tenants and/or city maintenance personnel. The pools should be preserved and enhanced as part of a mitigation

F/9
Cont.

F/10

package to offset past destruction of sensitive environmental values to justify developing the largest grassland habitat remaining within Del Paso Park.

ACRP suggests the following components for the vernal pool mitigation package:

- a) Layout and position for the athletic complex should preserve at least the largest pool (pool #1 in Figures 2 & 3 of ACRP's Oct 15, 1984 correspondence). If the athletic complex cannot fit between Haggin Oaks Golf Course and Business 80 without removing the pools, additional space must come from relocation of fairway #13 and the tee for fairway #14, not the vernal pools. We have presented the city with a discussion and maps regarding how much land could be produced with relatively little effort through this action (see letter and maps to Robert P. Thomas from ACRP dated Aug. 28, 1984).
- b) A new watershed will need to be contoured for the vernal pools which should also contain examples of relatively small pools typical of our region. After the layout for the athletic complex has been finalized on accurate topographic sheets the location and extent of the vernal pool watershed can be determined. ACRP cannot accept a watershed which leaves addition of sufficient water or exclusion of irrigation water from the softball fields into the vernal pools up to human judgement. The area must be sufficient for pool filling from precipitation and irrigation flow must be directed away from the pools by gravity. The specifics of these criteria are left to the vernal pool consultant.
- c) When the vernal pool watershed and newly created vernal pools have "settled down" all of the pools in the region should be restocked with the species likely to have occurred in pools of their respective size prior to disturbance of the region. We specifically recommend Colusa grass (*Neostaphia colusiann*) should be introduced into pool #1. Since Jones, Stokes and Associates has a recognized vernal pool scientist, there should not be any problem obtaining the necessary permit(s) to collect seed, cultivate specimens, and introduce endangered species this project will require.

This mitigation package will increase the number, area, and diversity of the Del Paso Park vernal pools. By returning ecological values to the park which were lost long ago the city will

F/10
Cont.

he effectively mitigating for the violation of its own policy inherent in the developments proposed by the Del Paso Regional Park Master Plan. In this way the sports complex will be rendered compatible with the city and county natural habitat policy. Proposing to remove the pools for the athletic complex or to replace them with one or two pools on the Sacramento Science Center grounds would further exacerbate the loss of environmental values within the park and invite litigation. Adding vernal pools to the Science Center grounds is a worthy endeavor but it does not constitute replacement of the vernal pools west of Watt Avenue. (Steve Talley for ACRP)

5) Landscape Del Paso Park Master Plan developments with native plants: Jones, Stokes and Associates wisely recommends preserving existing oaks and utilizing native landscape as a wildlife and aesthetic mitigation measure - particularly for the athletic complex and parking areas. We concur and would extend this recommendation to include the day use recreation and neighborhood park area.

Because of its proximity to the vernal pool and Arcade Creek terrace areas, the arboreal landscape within the softball complex should be confined to blue oak (Quercus douglasii) with only occasional valley oak (Q. lobata) and interior live oak (Q. wislizenii). Understory species should be compatible with both oaks and full sun as it will take several years for adequate shade to develop. Planting within the parking area could be any, preferably all, of the local oak species. Trees should not be placed in a regular pattern except within the parking area where this is unavoidable.

Arboreal landscape within the grassland between Renfro Field and Norris Swale should be a mixture of valley, blue, and interior live oaks. Valley oak and interior live oak should predominate near Arcade Creek and blue oak should be planted near Auburn Blvd. Understory planting should take care not to create security problems and should emphasize native species which serve as valuable forage for desirable wildlife. (Steve Talley for ACRP)

6) Revegetate nonirrigated rough within Haggin Oaks Golf Course to form aesthetic and wildlife "islands": Thus far the Del Paso Regional Park mitigation package has dealt with only preserving existing functional natural habitat areas within the park (items 1-3), or has suggested how the small vernal pool area could be enhanced (item 4), and has shown that aesthetics can be improved and the transition between passive (natural area) and active use areas dampened by use of native species in the latter. Some forage is also provided for smaller animals which are prey for more sensitive wildlife elements through native plantings in

F/10

Cont.

K/1

K/2

active use areas. These mitigation measures do not directly address the most critical land use problem posed by the Del Paso Regional Park Master Plan - the loss of significant natural habitat to active use development in direct violation of city and county policy suggesting such areas are valuable and should be preserved.

It is serendipitous for everyone interested in the future of Del Paso Park that the eastern half of Haggin Oaks Golf Course contains an exceptional amount of very poorly landscaped unirrigated rough between fairways. ACRP has not yet calculated the amount of land classified as unirrigated rough but it is at least equivalent to the lands proposed for development in the master plan. Today these areas have virtually zero aesthetic value and are of only marginal wildlife value. (They support hordes of jackrabbits which are apparently free of predators.) ACRP recommends landscaping these barren areas with locally native plant species of proven aesthetic and/or wildlife value as the most important single act the city can undertake to render the developments contained within the master plan consistent with their own policies and objectives. Figure 1 suggests how this could be done to both increase aesthetic and wildlife values and make the game of golf a little more interesting at Haggin Oaks.

Foremost we point out the irrigated fairways where exotic landscape has flourished are to be retained. Around each rough area a buffer zone of mowed annual grassland would also be retained. Inside this area annual grasses would not be mowed and smaller shrubs and sublinguous shrubs (Salvia, Minimus, Lupinus, Eriogonum, etc.) would be encouraged. Inside the grassland subshrub belt would be a zone of medium and large shrubs (Rhamnus, Ceanothus, Arctostaphylos, Prunus, Cercis, Heteromeles, Aesculus, etc.). Within the center of each rough area and over a significant area of the largest unirrigated areas would be a zone of native trees adapted to uplands (the three native oaks and, possibly, oracle oak (Q. morehus) and digger pine (Pinus sabiniana)) in addition to appropriate small trees, shrubs, and subshrubs. As the jackrabbit populations of these areas come under full control (they are not a problem at nearby Bushy Lake where grey fox and coyote are common) an effort could also be made to improve the value of grasses and forbs within the islands.

Native landscaping within Haggin Oaks Golf Course would add the increasingly popular primitive aspect to the course and be aesthetically pleasing. While the landscape could not be directly appreciated by motorists on Business 80, spectators

K/2

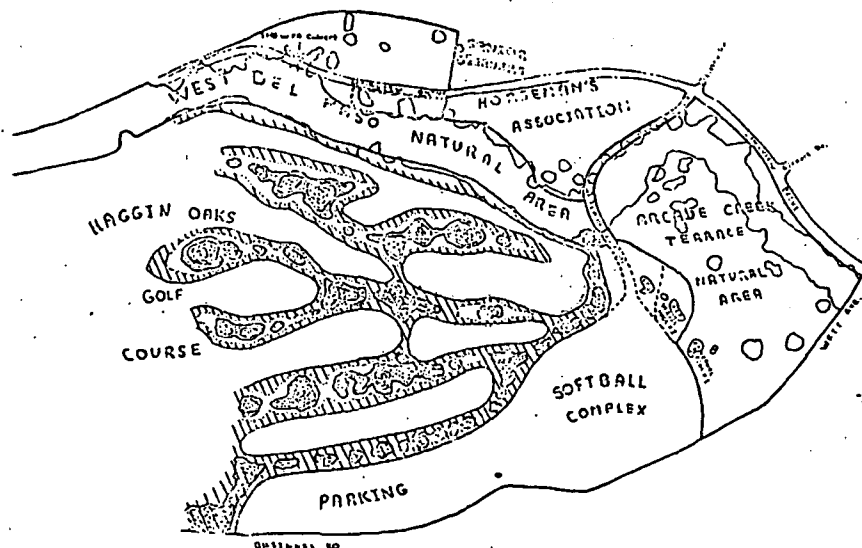
Cont.

Page 9

K/2
Cont.

Steven N. Talley

Figure 1. A conceptual plan for reestablishing native vegetation on the eastern portion of Haggis Oaks Golf Course to mitigate for wildlife and aesthetic impacts incurred through Del Paso Regional Park Master Plan developments within existing natural habitat. For fire control and security purposes only trees would be planted and all grass mowed about restrooms within Haggis Oaks Golf Course and along the boundary between the golf course and adjacent properties.



Scale

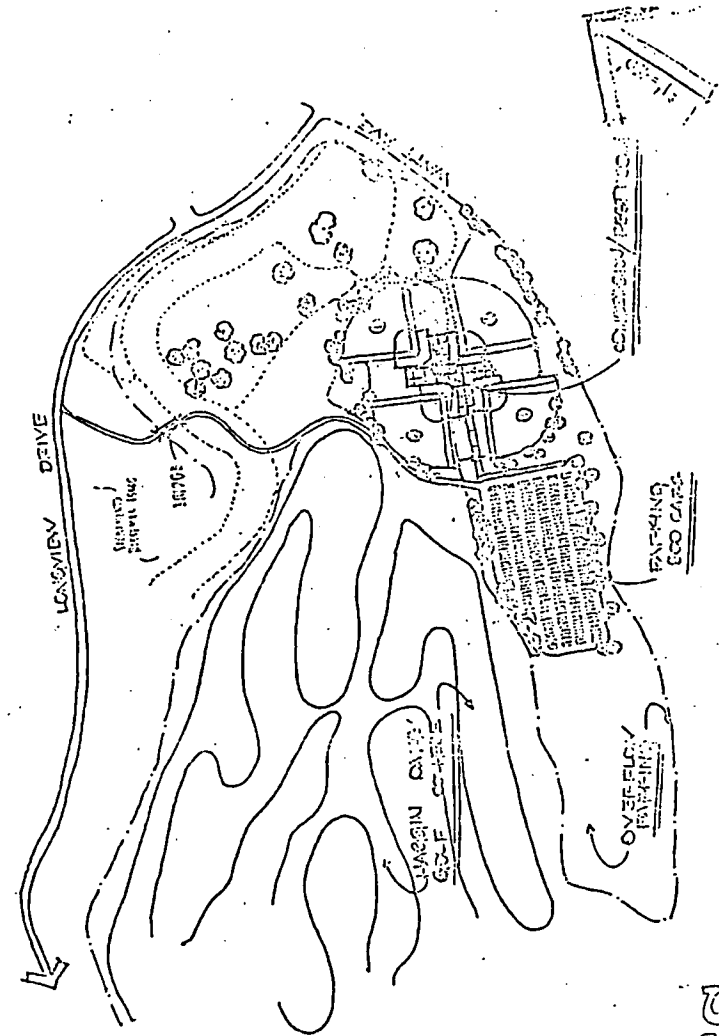
Scale

500 f.

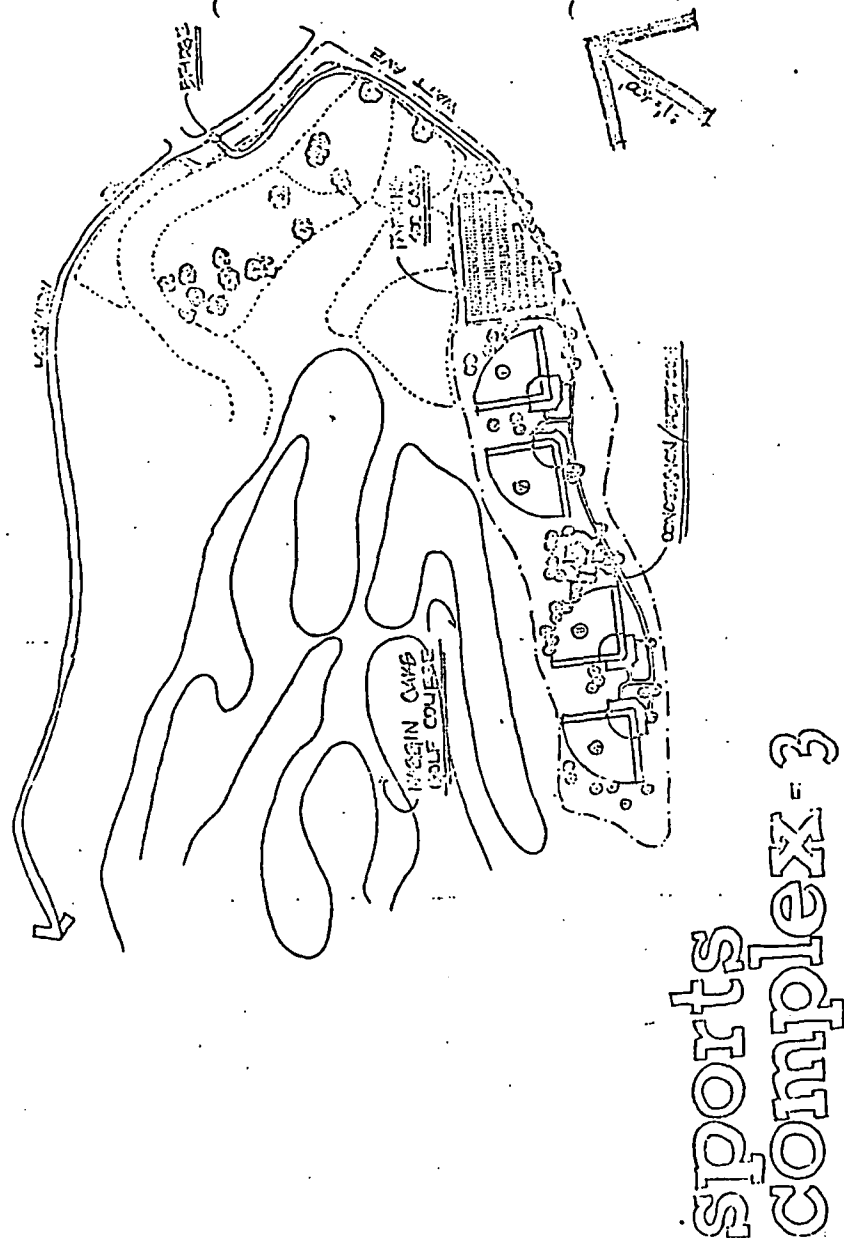
- Existing Native and Naturalized Trees
- Irrigated Fairways with Exotic Landscapes
- Mowed Unirrigated Grassland (including areas under trees along boundary with the golfhole complex)
- Native Subshrubs and Sublinguous Shrubs (eg. monkey flower) in Mowed Annual Grassland
- Native Trees, Subshrubs, and Sublinguous Shrubs in Unmowed Annual Grassland
- Native Trees with Occasional Shrub and Subshrub Understory

Appendix I

Conceptual Plans for Sports Complex-2 & 3



Sports
Complex-2



To: City of Sacramento
Department of Parks and Community Services

November 14, 1984

Del Paso Regional Master Plan - Draft Environmental Impact Report

I urge the City of Sacramento to adopt a Del Paso Regional Park Master Plan that not only serves the baseball/sports constituency of Sacramento but one that also identifies, protects and enhances the natural heritage and landscape values of Sacramento and the Central Valley.

The Del Paso Regional Park exhibits representative plant communities and wildlife populations all but lost from the Sacramento landscape. The City has demonstrated its commitment to a first class, comprehensive sports complex. This entire facility with parking lots, fields and restaurant must not be undertaken at the expense of our natural heritage.

The first steps have already been undertaken by the City to identify and protect the Arcade Creek natural area. However, a more positive management program is still needed to insure the longterm restoration and enhancement of Arcade Creek and its environs.

The City of Sacramento needs to place Arcade Creek restoration and protection at the same level of priority as the Sports Complex. It needs to make the commitment, in funding and personnel, to assure all Sacramentans that we will not lose this irreplaceable resource.

I further recommend that the City adopt a policy that takes a percentage from the sports complex revenues, at least 50, to adequately fund the restoration of the Del Paso Regional Park natural areas.
(Ray Tretheway)

F/II

Ray Tretheway
520 Garden Highway
Sacramento, Ca. 95833



U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE

CALIFORNIA DIVISION
P. O. Box 1915
Sacramento, California 95809

November 14, 1984
IN REPLY REFER TO
HC-CA

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA

Sacramento
Science Center and
Junior Museum

3615 Auburn Boulevard
Sacramento, California 95821

Phone
916 435-4471

A Non-Profit Organization

November 15, 1984

Ms. Barbara E. Bonebrake
Department of Parks and
Community Services
3520 Fifth Avenue
Sacramento, California 95817

Dear Ms. Bonebrake:

Your letter of November 6, 1984 requested comments on the Draft EIR
for the Del Paso Regional Park Master Plan Implementation Program.

We have reviewed the document and have no comments or questions.

Thank you for the opportunity to review the project.

Sincerely yours,

Michael A. Cannon

For
Bruce E. Cannon
Division Administrator

Department of Parks and Community Services
City of Sacramento
3520 Fifth Avenue
Sacramento, CA 95817

Attention: Barbara Bonebrake

Dear Ms. Bonebrake:

The Sacramento Science Center and Junior Museum would like to go on record as supporting the development of a parking facility in the area west of Bridge Street and Renfree Field as indicated in the proposed Master Plan. In 1981, the Department of Community Services supported the Sacramento Science Center's proposal of developing a "Greenlot" concept parking facility. A description of this project is attached here.

We would like to include this proposed development concept in the final EIR for the Del Paso Regional Park Master Plan. Please contact John Anderson or me for additional information.
~~Orlando~~ (Sacramento Science Center and Junior Museum)
Sincerely,

Kay Antunez
Kay Antunez
Grounds Coordinator

Rec'd 11/20/84



Sacramento
Science Center and
Junior Museum

A Non-Profit Organization

3515 Auburn Boulevard
Sacramento, California 95821

Phone
916 485-4471



CITY OF SACRAMENTO

DEPARTMENT OF COMMUNITY SERVICES

PARKS DIVISION

3120 FIFTH AVENUE

TELEPHONE (916) 444-4320

SACRAMENTO, CA 95817

GENE ROBINSON

PARKS SUPERINTENDENT

February 10, 1981

Austin B. Carroll
Austin B. Carroll & Son
P.O. Box 112
North Highlands, CA 95660

Dear Austin:

I have discussed your concept paper with our Director, Mr. Wisham, regarding the proposed Urban Forestry Grant application for the Science Center. We are in agreement with the concept as presented and recommend that you proceed with your application. If your grant is approved, it will be necessary for the Sacramento Science Center to follow the terms of the lease with the City. The lease requires submittal of working drawings of the plans and any specifications for City approval prior to commencement of construction.

Good luck on your project and if we can be of further assistance, let us know.

Cordially,

GENE P. ROBINSON
Parks Superintendent

The Sacramento Science Center and Junior Museum hereby certifies that the owner of the proposed Green Lot project area, the City of Sacramento, Department of Community Services, Parks Division, has approved the project and the use of the land (see attached letter).

John W. Anderson
Executive Director

GPR:ket

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Arcade Creek
Natural Habitat
Area

Sports Complex

Vicinity Map

N

City of Las Vegas

Las Vegas Blvd

N. Las Vegas Blvd

S. Las Vegas Blvd

E. Las Vegas Blvd

W. Las Vegas Blvd

N. Las Vegas Blvd

S. Las Vegas Blvd

E. Las Vegas Blvd

W. Las Vegas Blvd

[illegible]

(916) 322-7791

November 16, 1984

CITY OF SACRAMENTO

NOV 21 1984

DEPARTMENT OF
COMMUNITY SERVICES

Robert P. Thomas Director
Parks and Community Services
3520 Fifth Avenue
Sacramento CA 95817

RE: DEL PASO REGIONAL PARK EIR

Dear Mr. Thomas:

The Native American Heritage Commission appreciated the opportunity to express its concerns and comments in the environmental review process. As you know, the Commission is mandated to preserve and protect places of special religious or social significance to Native Americans pursuant to Section 5097 et seq of the Public Resources Code.

A review of the Draft EIR indicates that while no prehistoric sites were located within the project boundaries, there is a possibility that Native American cultural resources may exist near Arden Creek. As a result, we strongly recommend that a Native American observer as well as a qualified archeologist be present during construction. If requested, we will provide a list of those groups or individuals who have expressed their interest and are of the appropriate heritage to the project area. In the meantime, we would suggest that you contact William J. Franklin, P.O. Box 4, Sloughhouse, CA. 95683, telephone number (916) 351-0848 for initial consultation on your project. (Native American Heritage Commission)

If you have any questions or comments, please contact the Commission.

Sincerely,

John D. Smith
Executive Assistant

JDS/6.g.
cc:



THE CALIFORNIA NATIVE PLANT SOCIETY

DEDICATED TO THE PRESERVATION OF CALIFORNIA NATIVE FLORA

3501 Pageant Drive
Sacramento, CA 95826
November 19, 1984

Environmental Assessment Team
Del Paso Regional Park Master Plan
Department of Parks and Community Services
3520 Fifth Avenue
Sacramento, CA 95817

Dear Sir/Madame:

The Sacramento Valley Chapter of CNPS understands the need for a sports complex in Sacramento, and although placing it in Del Paso Regional Park is in opposition to both city and county policies to acquire and maintain natural areas, will endorse the facility if adequate mitigation measures can be carried out to preserve the environment. These measures must be sufficient to make up for loss of open space and wildlife habitat for forage and cover, loss of riparian, woodland and savanna oak habitat both for large heritage and regenerating young oaks, for loss of creek habitat in the event of bridging, and because in the long run development will cause deterioration of the natural areas. (Betty Matyas for CNPS)

Serious steps must be taken to preserve the large oaks by keeping them in their natural setting, not in asphalt, to preserve oak habitat by placing the sports arena and parking lot as far south on the property as possible, and to restore oak woodland and oak savanna. The great oak forests that grew four miles wide on each side of our valley rivers are gone, and the tiny fragments of remaining oak habitat are being gobbled up rapidly. The importance of this valley characteristic was emphasized last week by the county supervisors' action to sponsor Tree Foundation's 1985 Year of the Oak - to bring back the native habitat. (Betty Matyas for CNPS)

Sports Complex Plan 1 would be unsuitable to our considerations for the following reasons:

- 1) parking lot ruins the old terrace, the area of oak regeneration,
- 2) too close to the riparian area, and parking lot eliminates foraging and cover for ground dwelling species,
- 3) heritage oaks would be placed in asphalt, an unnatural setting,
- 4) cut and fill necessities would damage the heritage oaks, and eradicate blue oak reproduction by covering them. (Betty Matyas for CNPS)

Sports Complex 2 might be a more workable plan, with mitigations, because:

- 1) parking is to the south of the sports complex

- 2) terrace would be left available for revegetation, also protecting the creek wildlife corridor, F/15
CONR.
- 3) would be convenient if access were to be made from the south. N/3
(Betty Matyas for CNPS)

The entire access route problem necessitates further study because:

- 1) Watt Avenue traffic is already annoyingly heavy on its entire length, and will continue so, even with addition of another lane in this vicinity. What is the stated traffic capacity for Watt in the Longview area? (Betty Matyas for CNPS) H/1
- 2) Peak traffic figures on an average day, but not peak at competition times have been addressed. Figure H-3 shows a total of 190 cars turning onto Longview from Watt at peak time on an average day. Then why have 800 parking spaces? How often will 800 spaces be used, and what will it do to congestion at Watt and Longview? Will a left turn lane on Watt be adequate? H/2
(Betty Matyas for CNPS)
- Figure H-4 shows 30 more cars proceeding north on Watt from the Auburn intersection with as opposed to without the project, but at Longview 100 cars are turning left. Where did the extra 70 cars come from in this short distance? (Betty Matyas for CNPS) H/3
- 3) Emergency vehicles would have difficulty entering from Watt in times of heavy traffic. For safety there may need to be more than one access route. One might be for emergency vehicles only. M/1
(Betty Matyas for CNPS)
- 4) Bridging the creek, and also paralleling it, would be undesirable because of loss of wildlife and vegetation on both sides of the creek. A dangerous horse-car conflict would be present. The traffic figures for the Watt-Longview intersection have been underestimated, and traffic would clog on both streets. D/4
H/4
(Betty Matyas for CNPS)

Fulton Avenue access should be reassessed, and given much more consideration. It would be close to parking in Plan 2 and 3, and traffic density on Fulton is far less. A Horse Ave. access would have these same advantages, but cost of bridging would be some \$500,000. (Betty Matyas for CNPS) B/5

For the area east of Renfree Park we recommend that:

- 1) the neighborhood park be eliminated from its proposed site, and be incorporated into the day-use area, and the softball complex, as suggested on P. 43. (Betty Matyas for CNPS) D/5
- 2) since the existing neighborhood park has picnic facilities, it would be unnecessary to duplicate them in East Del Paso Park. B/6
(Betty Matyas for CNPS)
- 3) the area east of Morris Swale be left entirely as a natural area to mitigate for loss of forage and cover area by the sports complex, and by lawn planted to the west of Morris Swale. F/16
(Betty Matyas for CNPS)

In summary, we recommend:

- 1) use of Plan 2 with mitigations for habitat loss: F/17
 - a) area east of Morris Swale to be left natural for forage and cover and recovery of native vegetation
 - b) area north of Longview to be preserved for the same reasons
(Betty Matyas for CNPS)

- 2) as much land as possible be left natural in order to keep the amount of introduced species lower, and because this land is the last undeveloped portion of Rancho Del Paso, which makes it an historic consideration. We feel that natural areas have as much historic value as those remembered for human inhabitation. (Betty Matyas for CNPS)
- 3) that reforestation be allowed to take place on the old terrace, and east of Morris Swale, and that this effort be assisted with plantings, if necessary. (Betty Matyas for CNPS) F/18
- 4) that lawn, and necessity for irrigation be kept to a minimum. D/6
(Betty Matyas for CNPS)
- 5) that natives be used exclusively in landscaping. K/3
(Betty Matyas for CNPS)
- 6) that overflow parking be prevented in sensitive areas. D/7
(Betty Matyas for CNPS)
- 7) that access be reassessed, and a route be chosen that would be least damaging to the environment, safer for horse traffic, and would not add to the already unpleasant auto traffic difficulties. (Betty Matyas for CNPS) B/7

We appreciate this opportunity to be a part of our community by commenting on the plan, and hope it will help to find solutions amenable for now and the future.

Sincerely,

Betty Matyas

Betty Matyas, President
Sacramento Valley Chapter

Nancy Lindsay
5009 Whitney Ave.
Carmichael, CA 95608

November 27, 1984

City of Sacramento
Dept. of Parks & Community Services
3520 Fifth Ave.
Sacramento, CA 95817
Attn: Ms. Bonebrake

Dear Ms. Bonebrake:

I am pleased to have the opportunity to comment on the Draft Environmental Impact Report for the Del Paso Regional Park Master Plan Implementation Program. The undeveloped area of Del Paso Park is a valuable resource and its development must be carefully guided. For this reason I have participated in the planning process for Del Paso Park since its origin in September, 1982. Unfortunately, I am unable to attend the Sacramento Planning & Community Development Committee meeting on November 28th to present my concerns regarding the Draft EIR. Please distribute copies of this letter to the Committee in my absence.

I have used the following abbreviations throughout my comments:

DEIR = draft environmental impact report
DURA = day-use recreation area

Alt = alternative
p = page
¶ = paragraph
l = line

I. Number of Softball Fields

Given that the conceptual master plan adopted by the City Council in March, 1983, provided a 3 field softball complex, I find it strange that the DEIR only considers 4 field complex alternatives. The possibility of a 4 field complex was not discussed during the 5 public planning meetings held for the conceptual plan between September, 1982 and March, 1983, and to my knowledge, the City Council has not amended the master plan to include a fourth field, yet the DEIR assumes that there will be 4 fields. In light of the numerous adverse environmental impacts associated with development of the sports complex (including parking lots and access routes), the inconsistencies of developing the natural habitat area with City & County policies to preserve, maintain and acquire natural habitat, and the fact that only 3 fields were approved in the conceptual master plan, it seems logical that a 3 field complex alternative should have been evaluated in the DEIR. The final EIR must include an assessment of a 3 field complex (if associated parking lot) in order to assess the environmental tradeoffs between a 3 field & 4 field complex. (Nancy Lindsay)

II. Maps

In order to fully assess the impacts of the different developments, it is extremely important to have accurate maps. Unfortunately, the DEIR contains inaccurate maps and does not include maps for all of the proposed improvements. The inadequacies of the maps makes the validity of the conclusions drawn on the basis of those maps questionable. Specific comments follow:

- 1) Maps of Alts. 1, 2 & 3 are presented on pages 10, 11 & 12. These maps are drawn on different scales and with different orientations. In order to compare the impacts of different configurations of the sports complex, parking lot & access route, the final EIR must present maps of the 3 alternatives using the same scale & orientation. Moreover, the maps presented on p. 10-12 are inaccurate. The final EIR must contain maps based on the land survey conducted by the city & must present the existing vegetation accurately, especially the location of the heritage oak trees. (Nancy Lindsay)
- 2) The DEIR does not contain any specific maps for the proposed developments in East Del Paso Park. These developments include a parking lot west of the

existing Renfree Field parking lot, Natural habitat area, DURA & a Neighborhood Park. The lack of maps for these developments, often referred to as "other improvements" in the DEIR, is indicative of the lack of discussion these developments received in the DEIR. The final EIR must contain specific maps of all of the proposed developments for the park including maps of any recommended configurations. (For example, the DEIR recommends merging the proposed DURA & Neighborhood Park, p. 43) (Nancy Lindsay)

- 3) The final EIR must contain a base map of the park void of any of the proposed developments to use as a basis for comparison. The DEIR uses an old conceptual design map (including proposed developments) for this purpose. For example, the land use map (p. 34), soils mapping units map (p. 46), vernal pools & oak regeneration map (p. 55) and floodplain map (p. 73) must be plotted on an accurate base map rather than the old conceptual design map. (Nancy Lindsay)

- 4) To adequately assess the impacts of developments on the oak regeneration

B/10
Con

D/9

B/10

F/19

areas of vernal pools, and the impact of the flood plain on the proposed developments, specific maps including the flood plain, oak regeneration areas of vernal pools must be drawn for each of the alternatives as well as for the proposed developments in East Del Paso Park. Without these maps, the validity of the DEIR's conclusions regarding the impacts of the developments are unsubstantiated. (Nancy Lindsay)

III Access

- 1) Both orally at the public meeting on October 2, 1984 and in writing in my comments on the Notice of Preparation I requested the City to consider alternative access routes to the sports complex including access from Fulton Ave, Business 80 and Watt Ave. On p. 13, the DEIR says that access from Fulton was considered, but was deemed unsafe & too expensive, and access from Business 80 was also considered infeasible. However, the DEIR does not contain any documentation to support these conclusions. It appears that alternatives to the Longview Dr. access route were not really considered. The DEIR identifies the following adverse impacts associated with access

B/11
Con

B/11

B/12

From Longview Dr.:

- destruction of a 30' wide corridor in the riparian zone
- dividing the oak woodland savanna, thereby disrupting the foraging areas
- interference with the existing trails & possible safety hazards
- the impact of flooding on the access bridge & road.

In light of these impacts, as well as the potential adverse impacts to the riparian zone & oak woodlands during construction, alternative access routes which avoid these areas must be considered. The final EIR must include a substantive review of access from Fulton Ave, Business 80 & Watt Ave. (Nancy Lindsay)

B/12
Cont

- 2) The Longview Dr. access route includes a bridge over Arcade Creek. Although the bridge will have adverse environmental impacts, the DEIR does not specifically address these impacts as they are related to the access bridge. Instead, the access bridge is presented as a foregone conclusion. This is due to the fact that alternatives to the Longview Dr. access route are not considered. The final EIR must specifically assess the access bridge and the no access bridge alternatives, & include the conclusion (Nancy Lindsay)

B/13

IV. Sports Complex/Parking Lot/Access Route Components

Although the DEIR presented alternative sports complex, parking lot & access route configurations, it did not adequately address the specific or interactive impacts of the three components. (Nancy Lindsay)

B/14

- 1) Specific Impacts: As described by Ron Bass of Jones & Stokes, the EIR was intended to evaluate the impacts of the different components separately to enable the city to "mix and match" the components to obtain the optimal configuration. However, the 3 components were not addressed separately. Instead, the parking lot component was evaluated as part of the sports complex component, thus it is impossible to use the "mix and match" idea. Since the parking lot has a great deal of potential for adverse impacts, it must be evaluated separately in the final EIR and the conclusion should be added to the summary table (pgs 18-32). (Nancy Lindsay) The analysis of the impacts of the parking lot must include, at a minimum, vegetational & wildlife impacts, runoff & the effects of runoff on the water quality of Arcade Creek and the tradeoffs between different sized parking lots and the environmental destruction resulting from the different sized

D/9

F/20

G/1

parking lots. In order to evaluate the tradeoffs, a justification for the different sizes of parking lots is necessary. (Nancy Lindsay) An example of a tradeoff would be preserving one vernal pool by building a 700 car parking lot instead of an 800 car lot. In addition, the final EIR must evaluate the use of "green lot" parking lots as a mitigation measure. Green lots allow infiltration thereby reducing runoff and allowing natural groundwater recharge. In my written comments on the Notice of Preparation, I asked the city to evaluate the use of green lots in the DEIR. This request was ignored. (Nancy Lindsay)

G/1
Cont.

D/10

- 2) Interactive Impacts: The DEIR does not adequately address the impacts of the individual components of the sports complex, parking lot & access route as they relate to one another. (Nancy Lindsay) This is most obvious in the discussion of Access Road A on p. 59 which says, "Access Road A would have the least impact on vegetation of the area because of its short length." (Nancy Lindsay) Furthermore, the Summary Table uses the same rationale to conclude that Road A will have a "beneficial" impact on oak regeneration areas (see p. 22, 2nd impact). These

D/11

F/21

G/1

conclusions are completely false
 when the access road is viewed
 in conjunction with the parking
 lot for sports complex 1. The only
 reason that access road #1 is
 short is because it is associated
 with a parking lot which
 destroys oak woodland area.
 Thus, the final EIR must reevaluate
 the vegetation & wildlife impacts
 of the access routes as they
 relate to the parking lot and
 sports complex components. (Lindsay)

Cumulative Impacts
 The DEIR's discussion of cumulative impacts
 is wholly inadequate. Both orally at
 the public meeting on October 8, 1984
 and in writing in my comments on the Abt's
 of Prop. 13 I requested the City to
 address the cumulative impacts of the
 proposed park developments in relation
 to each other as well as in relation
 to the City of County of Sacramento. The
 DEIR does not address either of those
 impacts. At a minimum, the final EIR
 must address the following:
 1) Identify & evaluate the cumulative
 impacts of developing all of the
 proposed improvements with respect
 to vegetation, wildlife, water quality

F/22

O/1

2)

drainage, flood control & aesthetics.
 For example, foraging area will be
 reduced by construction of the sports
 complex, parking lot, access route,
 Dura and neighborhood park.
 What will be the overall impact on
 the foraging area & can the remaining
 lands sustain the current wildlife
 population? Another example:
 "If the parking lot for sports complex 1
 will restrict the flood-carrying
 capacity of the floodplain, and increase
 the water surface elevation upstream
 of this location" (p. 74, ¶ 2, d 9).
 How will the development in East
 Del Paso Park be affected? Mitigation
 measures for the cumulative impacts
 must also be identified in the final
 EIR. (Lindsay)

When the City Council adopted the
 final conceptual master plan in
 March, 1983, it did so with the
 provision that the Dura and
 neighborhood park would be the
 last improvements to be developed
 and that development of those
 units would be reconsidered after
 the other improvements had been
 developed. This provision is
 particularly important in relation
 to cumulative impacts. I believe

O/1
 con

O/2

that wildlife displacement resulting from intensive development in West Del Paso Park will cause the natural habitat area in East Del Paso Park to become even more valuable. Thus, the provision passed by the City Council must be maintained and enforced as a mitigation measure for cumulative impacts. (Nancy Lindsey)

0/2
Cont.

- 3) Although the DEIR notes that the undeveloped portion of Del Paso Park "... is unusual because it contains a significant natural habitat in an area that is surrounded by urbanization" (p. 62, A 4, L 4) and "provides an island of high quality habitat for resident wildlife and attracts a variety of seasonal visitors during bird migrations" (p. 62, A 4, L 6), it fails to assess the importance of the natural habitat area in relation to other city & county of Sacramento. The DEIR notes that "habitat for valley oaks, once very abundant throughout the Sacramento Valley, has been significantly reduced by agricultural practices & urban development" (p. 51, A 4, L 1); however, it does not assess the actual availability of this type of habitat in the city & county of Sacramento. The final EIR must include a more substantive review of the availability of riparian

F/23

F/24

woodlands and oak savanna throughout the city & county of Sacramento in order to assess the cumulative impacts of developing Del Paso Park. (Nancy Lindsey)

F/24
Cont.

VI. Consistency With Existing Land Use Policies

On pgs. 36 & 37, the DEIR assesses the consistency of the proposed project with relevant land use policies. I would like to comment on the following assessments:

- 1) 1982 General Plan Policy: "Maintain natural or native environment for low-intensity uses designed to ensure long-term protection" The DEIR makes 2 assessments:
- a) consistent: due to additional 63 acres of habitat preservation. This is completely false. The master plan falsely states that 63 additional acres of habitat will be preserved. Given that the entire undeveloped area in Del Paso Park is currently functioning as valuable natural habitat, any development of this area will reduce the amount of habitat area, not increase it! Thus, this assessment must be "inconsistent" in the final EIR.
- b) potentially inconsistent: due to elimination of oak regeneration of vernal pools in order to build a sports complex. Not only does this violate the policy with respect to protection, it violates the policy with

0/12

respect to low intensity uses. Clearly, a Four Field Softball complex is not a low-intensity use. Thus, this assessment must be "inconsistent" in the final EIR on two accounts. (Nancy Lindsay)

D/13
Cont.

2) 1982 General Plan Policy: "Methods of financing maintenance and operation should be included in the planning and implementation process". The DEIR assesses the project as being consistent with this policy due to fundraising by the Jaycees and a state grant application. Unfortunately, the City has only pursued funding for the sports complex and has not pursued funding for any of the other proposed improvements. Thus an additional assessment of "inconsistent" with respect to the DURA, Neighborhood Park, Natural Habitat restoration (The Ronfree Field Parking Lot must be included in the final EIR. Furthermore, I have heard rumor that the Jaycees have withdrawn their plans to fundraise for the sports complex. If so, what has happened to the \$5,000 seed money granted to the Jaycees by the city council in March, 1983, which was to be used for their sports complex fundraising effort? (Nancy Lindsay)

D/14

3) 1984 Master Plan Policy: "The Department shall initiate cooperative planning discussions with other recreation providers in the area

with the aim of coordinating facility development so as to maximize the diversity of opportunity available to residents." The DEIR assesses the project as being consistent with this policy since the City & County are working together to develop the softball complex. The DEIR fails to assess consistency with respect to the other proposed improvements. To fully capitalize on increasing the diversity of recreational opportunities, the City should be working with the Junior Museum & Science Center to incorporate the educational values of the oak woodland, riparian habitat & vernal pools with the Jr. Museums program, and the Effie Yeaw Center at Hoffman Park to explore the possibility of constructing an interpretive trail at Del Paso Park similar to that at Effie Yeaw. Thus, an additional assessment of "inconsistent" must be included in the final EIR. (Nancy Lindsay)

D/15

4) 1984 Master Plan Policy: "Allow revenue-producing facilities such as a sports complex to help finance other park operating expenses on the same site". The DEIR says the project is consistent with this policy since additional revenues from the sports complex could be used to finance other on-site expenses.

D/16

Does the City really expect the Sports complex to generate enough revenue to finance other expenses? If so, a policy specifically stating that X% of the profit will be used for development of the other improvements in the park must be incorporated into the final plans for the Sports complex, otherwise, the assessment of this policy must be "potentially inconsistent". (Nancy Lindsay)

D/16
Cont.

5) 1984 Master Plan Policy: "Aggressively seek state, federal, and local grants to improve city recreation services". The DEIR says the project is consistent with this policy, however, the City has only pursued grants for the Sports Complex. Thus, an additional assessment of "inconsistent" with respect to the other proposed improvements must be included in the final EIR. (Nancy Lindsay)

D/17

In addition to the policies considered in the DEIR, there are numerous City & County policies regarding the protection of open space, flood plains, natural drainage areas, natural streams and native environment which the final EIR must address. Please refer to the publication entitled "Agriculture of Open Space Prepared for Workshop I of the Joint City-County

D/18

Urban Development Task Force" dated November 19, 1984 for a detailed discussion of these policies. (Nancy Lindsay) D/18

In closing, I trust that the City and Jones & Stokes will consider my comments and make ^{the} necessary changes in the DEIR. Please contact me if you have any questions regarding these comments.

Sincerely yours,

Nancy Lindsay

SACRAMENTO
HORSEMEN'S
ASSOCIATION

3200 LONGVIEW DRIVE NORTH HIGHLANDS, CA 95660

November 26, 1984

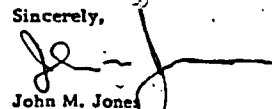
Mr. Robert P. Thomas, Director
Parks and Community Services
City of Sacramento
3520 Fifth Avenue
Sacramento, California 95817

Dear Mr. Thomas:

Enclosed are written comments pertaining to the findings set forth in the November, 1984, Environmental Impact Report submitted by Jones & Stokes Associates, Inc. for the Del Paso Regional Park Master Plan. These comments were compiled on behalf of the Sacramento Horsemen's Association Board of Directors, and its members-at-large, and relate to specific adverse impacts that will affect the Association.

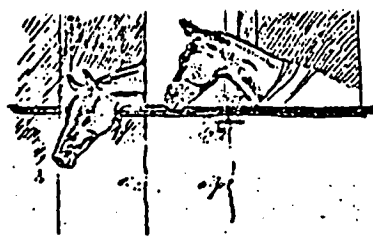
Should you need further information or clarification on any points brought out by this document, please don't hesitate to contact me at either of the numbers listed below.

Sincerely,


John M. Jones
1985 SHA President
Home: 962-1733
Office: 362-1104 Ext. 231

JMJ:dj
Enclosure

cc: Ms. Barbara E. Bonebrake
Mr. Terry Kastanis
Mr. Tom Chinn
Mr. Bill Smallman
Mr. Grantland Johnson



On September 16, 1982, the Sacramento City Council held its first meeting to investigate the potential for building a sports complex in Sacramento. The Sacramento Horsemen's Association (SHA) was represented at that meeting. In January, 1983, the Del Paso Regional Park Master Plan was presented. Since that time there have been a number of meetings with SHA represented at most, but the full extent of the impact this complex will have upon SHA did not become apparent until the publication in November, 1984 of the Environmental Impact Report by Jones, Stokes & Associates.

We are particularly concerned with the proposed access roads (Plan B-3 for Road A, Plan B-4 for Road B and Plan B-5 for Road C), for, although all plans would have an adverse impact upon the environment, Road B of Plan B-4 would have the greatest impact upon the environment, the Sacramento Horsemen's Association facility and horsemen using the bridle trail on each side of Arcade Creek. (John Jones for SHA)

Let me enumerate our concern:

L. Vegetation:

A. Riparian Vegetation:

The report points out clearly that all three access roads would have an impact upon the riparian vegetation, but Road B would impact vegetation significantly more due to the 800 ft. portion which parallels the creek on the south side. Road C would have a similar impact as B due to its paralleling the creek. Road A, on the otherhand, would have less impact than either due to its shorter length. To mitigate this impact the study suggests redesigning the road so it doesn't parallel the creek. Mitigation is fine, but without setting forth the "redesign" how can we determine whether the "redesign" will solve the problem and if it does, the impact the "redesign" will have? (John Jones for SHA)

B. Heritage Oaks:

Heritage oaks are worth protecting. According to the study, the placement of Road B through the natural area south of the riparian zone would fragment the area resulting in the need to remove Heritage oak trees. The study goes on to point out that the placement of Road A may be in the designed road way. The operative words here are "would" and "may."

The recommended mitigation for Road B is to design Road B to avoid as many oaks as possible. This design will still effect oaks. To what extent, the study doesn't make clear. (John Jones for SHA)

Recommended mitigation for Road A is to avoid Heritage oaks. This recommendation suggests that all oaks can be avoided. (John Jones for SHA)

Road C would follow the same mitigation as Road A because that portion which approaches and crosses the creek is the same in both.

II. Police

An increased need for police translates into an increased expenditure of dollars and a decreased availability of protection. According to the Environmental Impact Report, Road B will be more costly to the public in dollars and protection.

The long winding road will increase traffic accidents and congestion. Road configuration could encourage vehicles to park on the road when the lot is full, which could cause traffic congestion and damage to the geological resources.

The report suggests that to mitigate the problems, barriers could be put in to prevent parking along the access road. The solution sounds simple and effective, but there are several oversights. First, the "long winding road" is stated as being the cause of accidents and congestion, therefore, how can barriers prevent accidents? "Road configuration" is said to cause parking on the road. Barriers may prevent that, but I doubt it. Every day the police find people parking beside barriers and under "No Parking" signs designed to discourage parking. (John Jones for SHA) M/2

Full parking lots may result in parking on the SHA facility, especially the barn area. Road B will, at the Longview Drive entrance, come within thirty (30) feet of the main SHA parking lot on Longview Drive. Where the bridge crosses the creek is more open land that isn't used for parking, but people could park on it. It is even closer to the sports complex than the Longview Drive parking lot. Here lies the problem. Frequently, we find people parked in handicapped parking spaces. Why? Because it is closer to where they want to be. This suggests that some people have little consideration for where they park. If people park on the SHA facility it will necessitate our employees playing "policeman." If the violator happens to get his vehicle parked without being seen, SHA will be forced to have the vehicle towed or to call the police. The end result may be friction between users of the sports complex and SHA. That we wish to avoid. Our employees have enough to do without this problem. (John Jones for SHA) D/20

III. Trespassing

The sports complex will draw bike and foot traffic. Traffic on Road B will pass within twenty feet of the SHA facility for approximately three-quarters of the east property line.

In the past, the creek has acted as a natural barrier from people entering the facility from the south side. The bridge over the creek will serve as a natural path from the complex to the SHA facility for the unsupervised children who are brought to the complex with their father, mother, sister or brother who are playing there. Children coming into the complex on Road B will see the horses at the SHA facility and, since children are naturally attracted to horses, will return across that bridge to the horses. Children raised around horses do some pretty stupid and dangerous things putting their life at risk, so you can imagine what a child who isn't familiar with horses might do. A thousand pound horse can do tremendous damage to a child. We have many accounts of even the gentlest of horses maiming or killing people, even its owner. They rarely do damage out of viciousness, but instead out of fear. We don't wish a child to become injured, and we certainly don't want a child to be killed. There is also always the risk D/21

of a lawsuit should either happen. Conversely, we do not want a child to inadvertently cause injury to one of the horses.

The farther away from the horse facility the road, the less potential there will be for trespassing. (John Jones for SHA) D/21 Cont.

IV. Hazard to Horseman

The EIR admits that the present plans will produce hazards for horse traffic. The report estimates that the complex will receive 450-500 vehicles during a four hour evening of play. It also tells us that each weekend day will experience twelve hours of play. Quick division and multiplication tells us that there will be 1350 to 1500 vehicles during that 12 hour period, based upon the study's figures. Further, the ball fields will have a different game every hour. This tells us that there will not only be heavy traffic on any access road, but there will be frequent traffic. Here lies the conflict. The heaviest horse use is also during weekends. D/22

Crossing roads with a horse is, at best, a tricky maneuver. The solution is to traffic the horses under the bridge crossings, but a survey of the land where the bridge crosses the creek at Road B will tell even the most casual observer that when the altitude of the trail and the approach for the bridge are nearly the same, the bridge will not reach the needed height (12' to 15') for safe passage.

A solution here might be to build a longer bridge to compensate for the gradual drop of the land on the north side of Road B's location. That might work if one began far enough back (probably at the south end of the small arena). One must remember that the longer the bridge, the greater the cost. Another solution might be to build up the approach to the bridge with earth, which would probably be less costly than the longer bridge portion. This I believe would work on the north side, although, it would encroach upon even more of the SHA facility than is presently being done due to the required broad base. The south side would be a different story. The land on that side is only slightly lower than the north and therefore would require the same raised approach. Since raised approaches built up by soil require a wide base than a bridge on piers, you would be destroying more of the vegetation than had been previously envisioned. Further, these raised earth approaches will act as dams and will probably experience erosion.

Still another suggested solution is an arched bridge. Given the gradual drop on both sides and the relative short span of the bridge, I believe an engineer would tell you that there would be too rapid a rise to gain the needed height for horse passage at the trail. Again, the bridge would have to be longer or approaches would have to be built; the same disadvantages would be met. (John Jones for SHA)

At the point where Road A would cross, there is a natural and rapid drop to the trail and creek. The trail on both sides is at least fifteen (15) feet below Longview Drive, providing the clearance necessary for safe passage of horse and rider under the bridge. (John Jones for SHA) D/23

On November 21st members of the Department of Parks and Community Services proposed an alternative to those access roads listed in Jones, Stokes & Associates, Inc.'s Environmental Impact Report. The proposal is similar to Road C of the D/24

EIR, but doesn't cross at the same place. The spot chosen for this crossing does not provide enough bridge height on the south side of the creek for safe horseman passage under the bridge. Passage under the bridge on the north side is questionable. Again, passage over any road increases hazards for both horse and rider.
(John Jones for SHA)

D/24

IV. Reduction of Revenue

Recently the city increased SHA's lease (\$100 to \$450). Increase in the lease has placed a greater demand upon SHA for gaining revenue from the facility through increases in dues, fundraisers and rentals. An access road through the SHA facility will have a direct impact upon this potential.

Rental of the clubhouse comprises a significant percentage of our revenue. Access Road B will come within sixty (60) feet of the clubhouse and even closer to the back lawn and barbecue area. One of the primary rentals is from weddings and receptions. The back lawn and barbecue area is used in nearly all of these occasions, due to its beauty and rural atmosphere. To have a road with as much traffic as will be continually passing over it, as close as it will be to the clubhouse on weekends, will be to diminish the desirability for such activities, resulting in a decrease in revenue.

Road B will come within ten (10) feet of our small arena. This arena is used for a variety of activities, including horse shows. Heavy traffic this close to an arena will eliminate its use for shows. Again a loss of revenue.

The city has asked SHA to put into the facility a certain amount of capital investment, which translates into added expenditure above our cost of maintenance. One of those capital investments is to be the expansion of the small arena and covering it. We had hoped this might encourage horse shows during the rainy season, bringing us needed revenue. The close proximity of Road B will eliminate this potential.

Road B goes through the small exercise arena, therefore, eliminating this arena. There is no direct revenue gained off this arena, but it is one of the things that draws membership and barn renters.

A road through SHA increasing noise, light, and hazards and decreasing its aesthetic value will reduce membership, therefore, reducing revenue. (John Jones for SHA)

Regardless of where any complex and/or road near the Sacramento Horsemen's Facility is built and placed, they need to be built and placed in such a way and location as to not jeopardize the safety and security of those using the facility and adjacent trails or effect the Association's ability to gain income to meet its financial responsibilities.

p/25

In the final analysis SHA does not support the building of a sports complex on such sensitive land. We hope that Sacramento City will identify areas worth preserving in its natural state before it is all built upon or paved. SHA believes Del Paso Park to be such an area. (John Jones for SHA)

D/26

Timothy John Vendlinski
Arcade Creek Restoration Project
4130 Wheat Street
Sacramento, CA 95821
phone: (916) 487-3244 (home)
(415) 974-0255 (work)

Sacramento Planning and Community
Development Committee
AND
City Environmental Assessment Team

November 28, 1984

Comments on Draft EIR for the Del Paso Regional Park Master Plan

Dear Sirs/Mesdames:

The following paper is directed at both the City and County of Sacramento and the Jones & Stokes Associates' environmental assessment team. In some cases the document urges the City Council to take action on specific policies or direct Parks and Community Services to carry out an order. In other cases the document asks the environmental assessment team to explain, describe, or discuss something related to the development of Del Paso Regional Park. Furthermore, I illustrate the position of the Arcade Creek Restoration Project (ACRP) relative to park development. The ultimate goal of this document is to help foster a strong information base so we, as a community, can make the best possible land use decision.

Sincerely,


Timothy John Vendlinski
ACRP Coordinator

Section B: Project Description

Background, p.3

1. Reaffirmation of Adopted Park Development Policy: When the City Council adopted the conceptual master plan in March 1983, the council mandated that the 13 acre creek terrace lying east of Renfree Field and west of Norris Swale be the last area developed as part of the master plan implementation. While this area doesn't support as much oak regeneration as other park areas, regeneration is occurring on the periphery of the property and correct environmental conditions could produce substantial regeneration in the future. A vast area of blue oak savanna and regenerating oak woodland west of Watt Avenue will be destroyed by developing the softball complex, access road, and parking lot. We urge the City Council to reaffirm its policy and wait to develop the 13 acre terrace until the full environmental impacts of the other park components are completely understood. In this way, the 13 acre terrace will act as a bond to promote sensitive development elsewhere in the park and to guard the ecological integrity of the park's natural open space.

It is quite likely that development of the other park components will combine with conversion of open space outside the park to cumulatively impact the park's vegetation and wildlife and cause an enormous loss of plant and animal diversity. In this case, preservation and restoration of the entire area may be needed to provide the last refuge for our native oaks and abundant wildlife. Please make the reaffirmation of this foresighted policy one of your highest priorities. (Tim Vendlinski for ACRP)

Section C: Summary of Findings

Project Description p.15

1. Misleading Natural Habitat Plan: This section gives one the impression that natural habitat is actually being increased in the park. City Council must be aware that the master plan actually reduces the amount of usable wildlife habitat. All 250 acres in some way now function as wildlife habitat. Construction of parking lots, softball fields, an access road, day use turt area, and neighborhood park will drastically diminish the amount of natural open space still left in this region and adversely impact vegetation and wildlife. (Tim Vendlinski for ACRP)

Section D: Land Use

Study Area p.33-35

1. SMUD Power Line: SMUD 16,000 volt power line may have to be relocated (see reference page 39), but relocation is not considered

a significant impact. Discuss methods of line relocation and adverse impacts. Will the line be buried or removed? ACRP suggests that if the line is buried, trenching in the regenerating oak woodland would kill both young and heritage oaks. (Tim Vendlinski for ACRP)

2. Creek Crossings: "The bridge crossing Arcade Creek in this location (Bridge Road) is the only one in the park" (p.35). This sentence is misleading and understates the tremendous impact that the Interstate 80 and Watt Avenue bridges have on the park. These bridges may not technically be in the park, but they have greatly upset the park's riparian/oak woodland ecosystem since they not only cross the creek, but also functionally and aesthetically separate the park. Discuss the cumulative impact of adding a fifth bridge to this congested network of creek crossings. (Tim Vendlinski for ACRP)

3. Off-Road Vehicles: "No motorized vehicles are permitted on the bridle trails" (p.35). To my knowledge the city has no official law against off road vehicles within the park. If such a law exists, why isn't it enforced? Each season new trails are plowed out of regenerating oak woodland by irresponsible off-road vehicle operators. Clearly, a comprehensive post & cable system surrounding the entire park would prevent off road vehicle abuse. Such a solution was part of the conceptual master plan, but the EIR totally neglects to discuss the benefits of this comprehensive barrier system. Moreover, the Department of Parks and Community Services has left it to the citizens to finance this park component. We urge city officials to seek funds for the post & cable system with the same enthusiasm they demonstrated in the search for softball complex funding. If citizens were't so busy fending off environmentally insensitive park development plans, we could have probably secured money from the Proposition 18 Parks Bond. Discuss, in detail, methods to fund and construct a comprehensive post & cable barrier system. (Tim Vendlinski for ACRP)

Consistency with Existing Land Use Policies, pp. 35-38

1. Master Plan Inconsistency With Existing Land Use Policies: The EIR does a fine job of explaining how developing a softball complex in Del Paso Regional Park would directly and indirectly impact "oak regeneration areas, large oak trees, vernal pools, and riparian vegetation (and) would be inconsistent with both city and county policies." While the County's 1982 General Plan policy calls for the long-term protection of natural environments by allowing only low-intensity uses in natural areas, the city's own 1984 City Master Plan for Park Facilities and Recreation Services goes a step further by mandating the identification and acquisition of natural areas to promote public visitation, recreation, and education. However, in view of the need for softball facilities in the Sacramento community, ACRP accepted the concept of developing a softball complex only if it is designed with major emphasis upon protecting environmental values.

M/3
cont.

D/27

O/4

D/28

D/29

O/3

C/2

M/3

We believe the city could overcome this blatant inconsistency with both city and county policies only if park development is linked to an innovative mitigation package to preserve and enhance wildlife, plant, and aesthetic values throughout the park. (Tim Vendling for ACRP)

Since the beginning of October, ACRP has proposed specific ways to not only mitigate for the destruction of priceless wildlife habitat, but also provide Sacramento with a first class and highly aesthetic softball facility serving amateur softball teams throughout America. We used our own resources combined with topographic maps furnished by the city to design precise access routes and facility boundaries to limit the project's environmental impact on the integrity of the existing riparian/oak savanna/vernal pool ecosystem west of Watt Avenue. We have also stressed the importance of preserving the regenerating oak savanna north of Longview Drive and east of Norris Swale to provide permanent refuge for the park's wildlife displaced by development. Once the rest of the park is developed, and the remaining open space outside Del Paso is consumed by urban development, the park's preserved riparian corridor and regenerating oak habitat will be one of the few areas on the entire Central Valley floor where one can study an example of California's small stream/oak woodland community. (Tim Vendling for ACRP)

There is no need to discuss the adverse environmental impact the city's proposals would create; these negative impacts are discussed in detail in the ACRP letters addressed to the city's environmental assessment team on October 4, 1984; October 15, 1984; and November 14, 1984. Unfortunately, our proposals were largely ignored in an apparently flawed public input process. The EIR touched upon the mitigation idea by recommending the combination of day-use area and neighborhood park upon the 13 acre creek terrace (see below) to preserve the regenerating oak woodland east of Norris Swale. However, it stopped short of addressing the larger concept of a comprehensive mitigation package to offset the damage of overall park development. The following is a summary of ACRP's six point mitigation package. Discuss these mitigation elements and explain how their implementation can overcome the inconsistency with city and county policy. (Tim Vendling for ACRP)

a. Combine Day-Use Area & Neighborhood Park: Combine the day-use recreation area and neighborhood park and develop on the 13 acre creek terrace between Renfree Field and Norris Swale. This park component should be an extension of the turf area bordering Renfree Field. Add the area east of Norris Swale to the permanently protected natural habitat area along the creek to create the East Del Paso Natural Area. Refer to the map contained in the October 4, 1984 correspondence. This element was recommended to the city by Jones & Stokes Associates' environmental assessment team on page 43 of the EIR. (Tim Vendling for ACRP)

b. Preserve Natural Open Space North of Longview: Preserve the vanishing blue oak woodland/savanna north of Longview Drive

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D/30

D/31

D/32

F/28

(west of the Senior Gleaners) and restore the 1940 WPA bridge. Don't even consider developing this rare plant community to create revenues for natural habitat restoration and management elsewhere in the park. The city must exhaust all other possible funding sources for this purpose before sacrificing anymore of our natural heritage. (Tim Vendling for ACRP)

c. Preserve Ecological Integrity of Creek Terrace West of Watt: Preserve the ecological and aesthetic integrity of the regenerating oak woodland/savanna and vernal pool system west of Watt Avenue. We will only accept an access route which retains this area's ecological integrity. We will oppose any route which carelessly splits the terrace. (Tim Vendling for ACRP)

d. Preserve Vernal Pools and Create Drainage: Preserve the vernal pools and construct a drainage to allow for rainwater pooling in winter and prevent the pooling of irrigation water in summer. Restore the pools' plant diversity by introducing indigenous plant species and attempt to introduce endangered species. Rearrange portions of golf course fairways, if necessary, to accommodate the softball facility and preservation of vernal pools. Remember, the park supports 36 golf fairways consuming hundreds of acres while only a single large and restorable vernal pool remains on a scrap of undeveloped creek terrace. (Tim Vendling for ACRP)

e. Landscape Park With Native Vegetation: Landscape the athletic complex, day-use recreation area, neighborhood park and the new/restored parking lots with native plant species. This element was recommended to the city by Jones & Stokes Associates' environmental assessment team. (Tim Vendling for ACRP)

f. Restore Damaged Habitat by Landscaping Golf Course With Natives: Landscape the unirrigated rough within the eastern half of Haggin Oaks Golf Course with locally native vegetation to create aesthetic wildlife "islands". (Tim Vendling for ACRP)

2. Natural Streams Policy: Summarize the county's Natural Streams Policy (since much of Arcade Creek is covered by this policy) and explain whether or not the proposed project is consistent with the goals and objectives of the ordinance. (Tim Vendling for ACRP)

3. Interpretive Services: Determine usage and activity levels at similar urban natural areas with existing interpretive facilities and discuss the potential for developing quality interpretive programs along the "Arcade Creek Parkway". The Sacramento Science Center and Junior Museum is now located at the heart of Del Paso Regional Park and is an ideal anchor for such educational/recreational projects. An excellent model program is that of the Effie Yeaw Interpretive Center and 85 acre Natural Area within the American River Parkway. (Tim Vendling for ACRP)

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Cont.

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K/5

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D/34

4. Construction Impacts: Explain how proposed project will be built, i.e., access routes for heavy equipment, earth moving vehicles, and trucks carrying construction materials. Recommend ways to prevent these operations from inadvertently destroying sensitive natural resources. Damage could be greatly avoided if all construction equipment enters the project area via golf course maintenance roads. (Tim Vendlinski for ACRP)

Exhibit D-3. Consistency of the Proposed Project with Relevant Land Use Policies, p.36

1984 City Master Plan for Park Facilities and Recreation Services

1. Net Revenues for Natural Open Space Management: The EIR suggests that the sports complex would be consistent with the city's policy of allowing "revenue-producing facilities such as the sports complex to help finance other park operating expenses on the same site." This argument is based on the assumption that the city will spend additional revenues from the sports complex, over operating costs, to finance other onsite park components. ACRP urges the City Council to order Parks and Community Services to spend 5-10 percent of the net profits from the sports complex to restore and preserve the park's unique natural features. Parks and Community Services claims they won't have enough money left over to fund the Post & Cable system and habitat restoration. If this is true, ACRP suggests the city is once again in violation of its own policy. Explain how the city can use net revenues to restore and preserve the park's natural open space. (Tim Vendlinski for ACRP)

Mitigation Measures, p.43

1. Justify the Need for Paved Parking: ACRP applauds Jones & Stokes Associates' recommendation to use shuttle service from the light rail terminal and motels on Auburn Boulevard to transport large numbers of players and spectators to the softball complex and thus reduce the need for paved parking around the complex. Parking lot size on the three alternatives seems quite arbitrary (400, 700, and 800 car lots). Determine how many parking spaces can be reduced by the vigorous use of mass transit, explain the optimum parking lot size, and justify the suggested parking lot. (Tim Vendlinski for ACRP)

2. Install Barriers to Prevent Motorized Vehicle Use of the Bridle Trails: ACRP applauds Jones & Stokes Associates' recommendation to install barriers to prevent the abuse of the bridle trails by off-road vehicles. ACRP urges the city to order Parks and Community Services to install a comprehensive Post & Cable barrier system immediately. (Tim Vendlinski for ACRP)

Section F: Vegetation and Wildlife

1. Explain how the park's riparian oak woodland/savanna ecosystem operates as a significant regional component of Sacramento's "urban natural open space system" which includes Bannan Island and Slough, Effie Yeaw, Bushy Lake, Orangevale Park, and Goethe Park. Compare the ecological integrity of Del Paso Regional Park with these other areas and define their importance to the urban environment in terms of education, recreation, economics, and environmental quality. (Tim Vendlinski for ACRP)

1. Significance of Regenerating Oak Woodlands and Heritage Oaks: ACRP is pleased that Jones & Stokes Associates recognizes the rarity of regenerating oaks and the uniqueness of healthy Heritage Oaks in an urban area. However, several key areas of oak regeneration were left out of the discussion. ACRP urges the field investigators to reexamine the areas north and south of Longview Drive, south of Park Road, on the fringe of the 13 acre creek terrace east of Renfree, and in the area east of Norris Swale. Moreover, these regeneration areas should be presented on a

detailed base map which characterizes the open space as it now exists. The EIR presents the regeneration areas on a very small map of the conceptual master plan in Exhibit F-2. This makes the data not only difficult to interpret, but also presupposes the implementation of the entire conceptual plan. Since most of the park's oak regeneration is occurring within the natural open space, there is no need to include a map of the entire golf course. Provide current maps of the undeveloped park areas and then depict regeneration areas. Use Dr. Talley's detailed vegetation maps of the park. A number of these were provided to the city. (Tim Vendlinski for ACRP)

2. Destruction of Oak Regeneration Areas and Vernal Pools: Oak regeneration areas and vernal pools have been or are being damaged by mismanagement of the park's natural open space. Frequently, the city has mowed or ran over oak saplings with maintenance trucks. Vernal pools have been severely degraded by mowing and raking by unsupervised "502" work crews. ACRP urges the City Council to order Parks and Community Services to prepare and implement a management plan for the park's natural areas to guard natural resources while protecting the surrounding community from fire hazard. Explain how sensitive management can both improve natural habitat while reducing the risk of fire. Take into account the fire hazard created by the huge amounts of debris Park Road residents have placed along Park Road to discourage off-road vehicle abuse. (Tim Vendlinski for ACRP)

3. Urban Forest Concept and 1985 Year of the Oak: The city has simultaneously proposed to create a vast urban forest (largely of exotic trees) in South Sacramento and to destroy a vast native oak urban forest in Del Paso Regional Park. The former urban

forest has already cost thousands of dollars to plan and will take many years and much more money to create. The latter native urban forest comes absolutely free and is already flourishing. The City Council has a rare opportunity to preserve the reproducing oak woodlands in Del Paso Park by adopting ACRP's six point mitigation package. Such action would preserve an irreplaceable example of the Central Valley's natural heritage. Does it make sense to decimate our last functional oak woodland community in a year designed to honor and raise public awareness about our native trees? Explain the paradox of city action and recommend ways to eliminate this inconsistency. (Tim Vendlinski for ACRP)

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Cont.

Impacts, pp.58-60

1. Disaggregate Impact Categories: Without disaggregated analysis separating impacts of parking lots from softball fields from access routes, the consultants concluded Access Road A directly through the Arcade Creek terrace was the least destructive access option. However, the only reason this road is short and inexpensive is because it immediately leads into an enormous parking lot right in the middle of the park's most active oak regeneration area. Thus, the integrity of the oak community would be lost due to road division and the regenerating oak woodland would be totally decimated. The EIR must disaggregate discussion of the lots, fields, and roads so the best road can be matched with the best lot and these two elements can then be matched with the best field design. Moreover, the city must fully document why the access road from Fulton Avenue was eliminated from analysis (see page 13 of the EIR). (Tim Vendlinski for ACRP)

Mitigation Measures, p.61

1. Resource Value of Vernal Pools: The EIR states that if no threatened or endangered species are located in the pools or if the pools are dominated by non-vernal pool species, resource protection efforts should be foregone. This discussion avoids the central question of how a species becomes endangered. This question is very relevant in this case because park development threatens an entire ecosystem of the small-stream oak woodland system. The main cause of reduced biota diversity is habitat destruction. Riparian/oak woodland species not endangered now, but may soon find their way onto the endangered species list if their natural habitat continues to be destroyed. Must we wait for a plant or animal species to reach the brink of extinction before we appreciate its existence? The large vernal pool in the park is restorable and may be able to support vernal pool species that have all but vanished from the Central Valley. Explain how such a program would not only be of tremendous educational value, but also be a significant step toward preserving plant diversity. (Tim Vendlinski for ACRP)

F/37

Wildlife

Setting, p.63

1. Foraging Space: The EIR does an excellent job describing how birds of prey (raptors) such as hawks, kites, and owls rely on the open oak savanna for foraging space. It also explains why these large open areas, supporting sufficient numbers of prey species, must be preserved to protect the raptor populations. Explain how the displacement of these raptors by park development may lead to overpopulation of rodents throughout the entire park. (Tim Vendlinski for ACRP) Explain how this overpopulation could threaten oak regeneration as hungry rodents chew through the saplings' cambium. Estimate the acreage of foraging space required to maintain raptors within the park and then determine which park areas are best suited for permanent protection as critical natural habitat. (Tim Vendlinski for ACRP)

F/38

F/39

F/40

Section G: Water Quality, Drainage, and Flood Control

1. Parking Lot Drainage: Explain how the new parking lots can be built and the Renfree lot retrofitted with complete drainage systems to prevent sheet runoff and soil erosion. (Tim Vendlinski for ACRP)

G/2

2. Toxic Discharges: Determine point sources of toxic waste discharge into Arcade Creek from outside park boundaries and recommend legal action the city can use to eliminate such discharges. Of immediate concern is sewage odors emanating from the swale crossing the Junior Museum property and the paint/solvents entering the creek from the large concrete culvert passing under Longview Drive between Airport and Industry Drive. (Tim Vendlinski for ACRP)

G/3

Section K: Aesthetics

OUTSTANDING!!!

Section O: Cumulative Impacts

1. Cumulative Impacts of Open Space Conversion In and Outside the Park: Discuss the way residential, commercial, and industrial development outside the park combines with park development to cumulatively impact Arcade Creek's remnant riparian oak woodland/savanna ecosystem. Special attention must be given to the way such natural areas in this region have been converted to urban uses, the rarity of the remaining systems, and the increasing pressures to convert these last areas to residential, commercial, industrial, or recreation development. This discussion should begin by addressing how the following developments reduce the chance that oaks and the wildlife they support will be able to survive in this region: Senior Gleaners expansion and suggested development north of Longview Drive, the Benvenuti office development on Auburn Boulevard north of the I-80 intersection, development of the AT land by Forrar Williams Architects on Auburn-

O/5

Boulevard perpendicular to the I-80 intersection, the upcoming construction of the Stanford Children's Home on a 30-40 acre parcel of creek terrace along Winding Way west of Auburn Boulevard, and the implementation of the Del Paso Regional Park Master Plan. (Tim Vendlinke for ACRP)
Mitigation Measures, p.140

1. Riparian Easement: ACRP urges the City Council to order Parks and Community Services to assume management of 4.5 acres of Forrar Williams riparian easement (offered to the city) to maintain as natural habitat and thus help mitigate for the downstream loss of riparian forest caused by access road construction. (Tim Vendlinke for ACRP)

Arcade Creek Restoration Project

Plant Ecologist: Steven N. Talley
4347 Stollwood Drive
Carmichael, CA 95608

(916) 961-7564

November 28, 1984

Planning and Community Development Committee
Sacramento, California

Honorable Members in Session:

SUBJECT: Comments on the Del Paso Regional Park Draft EIR

GENERAL COMMENTS

The Draft EIR for implementation of the Del Paso Regional Park Master Plan requires extensive revision. We believe so much confusion would result from handling these revisions through an addendum to the Draft that the Final EIR should be a completely new document. (Steve Talley for ACRP)

Problems which beset this Draft EIR are of three general types:

1. Errors resulting from inaccurate and/or poorly conceived alternative plans for the athletic complex, its parking lot(s), and access route.
2. Incomplete (deficient) environmental analysis in the Draft EIR. There are really two types of problems here:
 - a. Problems related to failure of Jones, Stokes and Associates to incorporate valid comments and data generated by the Notice of Preparation Hearing (Oct. 8, 1984) into the Draft EIR. (Steve Talley for ACRP)
 - b. Problems related to the highly variable quality of different sections of the EIR. Only section "K" Aesthetics appears to be excellent. Sections "D" on Land Use and the Vegetation Component of Section "F"

b. (Cont.) should be rated as "good". The remaining sections are "adequate" except for the Project Description (B), Summary of Findings (C), and Cumulative Impact (O) Sections which are considered inadequate and should receive extensive revision (see Appendix 1 for specific comments). (Steve Talley for ACRP)

A/2
Cont.

3. Prior to the Notice of Preparation Hearing on Oct. 8, 1984 the Arcade Creek Restoration Project presented Parks and Community Services with more than sufficient data to document why implementation of the Del Paso Park Master Plan required environmentally sensitive facility placement and innovative mitigation for unavoidable adverse impacts. Parks and Community Services did not present environmentally sensitive proposals as a preferred plan or even a desirable alternative during the NOP Hearing on Oct. 8 or during the Draft EIR hearing on Nov. 14, 1984. These actions have led to a public relations problem between Parks and Community Services and the Arcade Creek Restoration Project and, we believe, the rest of the Sacramento environmental community. Recalcitrance to submit environmentally sensitive development proposals is at the bottom of many of the more serious negative comments we are compelled to submit on this Draft EIR. (Steve Talley for ACRP)

B/17

SPECIFIC SOLUTIONS

Problem 1. Poor Alternative Plans? See Appendix 1, comments for Section B of the EIR, specifically Exhibits B-4 and B-5 (page of this correspondence). (Steve Talley for ACRP)

B/18

Problem 2a. Failure to Incorporate NOP Comments: See Appendix 2 for resubmission of comments which have not been addressed, or are poorly addressed in the Draft EIR. (Steve Talley for ACRP)

B/19

Problem 2b. Variable Quality of the Draft EIR: See Appendix 1 for specific comments which should be addressed in the Final EIR. (Steve Talley for ACRP)

Problem 3. Public Relations: Environmentally sensitive development plans and innovative mitigation measures should be forwarded immediately by the City of Sacramento to Jones, Stokes, and Associates. (Steve Talley for ACRP)

A/3

SUMMARY COMMENTS

The Department of Parks and Community Services should move swiftly to incorporate environmentally sensitive designs into the layout for Del Paso Regional Park Master Plan developments. They should also inform their consultants of the special need for natural habitat mitigation within the park and encourage their effort to analyze the extensive mitigation proposals submitted by the Arcade Creek Restoration Project and other groups on Nov. 14, 1984. (Steve Talley for ACRP)

A/4

The need for sensitive facility placement and innovative mitigation for developments within natural habitat areas is due to the rare and declining nature of the plant communities threatened by these developments. These plant communities are:

1. Old growth riparian oak forest which is reported to be extant over 0.1% of its former range.
2. Regenerating creek terrace (high terrace) oak woodland and savanna which is really a rarer subunit of the riparian oak forest cited above. Moreover, this community type is disappearing at a faster rate than other riparian forest types.
3. Regenerating blue oak woodland and savanna which was once widespread in our region. This community type was also once the most widespread community within Del Paso Park. Today it is the most restricted community. Except for unusual areas like the Del Paso Park stands blue oak woodland have not successfully reproduced during the last century.
4. Low terrace vernal pools which are estimated at less than 5% of their original range in Sacramento County. (Steve Talley for ACRP)

F/41

The issue is not whether we should preserve these priceless components of our natural heritage or develop the areas for our immediate active recreation needs. All of the forementioned natural assets can be preserved if the athletic complex and other developments are designed with major emphasis upon preserving natural values and these developments are linked to an innovative mitigation package. A suggested mitigation package is outlined in our Nov. 14, 1984 correspondence to the Del Paso Regional Park Master Plan Environmental Assessment Team. (Steve Talley for ACRP)

A/5

Thank you,
Steven N. Talley
Steven N. Talley, Ph.D.

APPENDIX 1: SPECIFIC COMMENTS ON THE DRAFT EIR - DEL PASO
REGIONAL PARK MASTER PLAN IMPLEMENTATION PROGRAM

- p. 1 Section A, INTRODUCTION, Purpose of EIR. In its present form the Del Paso Regional Park Master Plan developments constitute an inefficient carnage of rare and very rare Central Valley plant communities to accommodate short term active recreation needs. Whether the word "designated" is used or not ANY allusion that these developments somehow are beneficial to either vegetation or wildlife within the region is so offensive to those knowledgeable of the issues that ALL such references should be rigorously expunged from the final document! (Steve Talley for ACRP) A/6
- p. 6 Section B, PROJECT DESCRIPTION, Proposed Improvements, Designated Natural Habitat Area. See comment above. If "Designated Natural Habitat Area" is to be listed as an improvement shouldn't we also mention that the entire 246 acre area covered in the Master Plan is functional natural habitat today? Even a casual examination of the 63 acres of natural habitat the Master Plan "finds" is an insult to the intelligence of persons with even a very basic knowledge of field biology. The "added" areas are but scraps of rare ecosystems which were either in areas too small, too, inaccessible, or too inconvenient to development, or where development would be impossible. The proposed improvements listed in this section are a natural habitat and open space disaster for the City of Sacramento. (Steve Talley for ACRP) B/20
- p. 8 Anticipated Usage and Benefits. Revenue comments alluded to at the bottom of the page should be revised considering Parks and Community Services Director Robert Thomas' comment on Nov. 21, 1984 that the athletic complex would be unlikely to "break even" financially. He cited annual deficits of \$80,000 for the Elk Grove facility. (Steve Talley for ACRP) B/24
- p. 9 Sports Complex Alternatives. Alternatives 1, 2, & 3 should be revised as per accurate and, hopefully, environmentally sensitive drawings from Parks and Community Services. (Steve Talley for ACRP) B/22
- p. 9 & 13. Access Route Alternatives. Ibid. (Steve Talley for ACRP) B/23
- p. 11 & 12. EXHIBIT B-4, B-5. These two figures need to be substantially upgraded. EXHIBIT B-4 softball fields should be offset such that the athletic complex is south of the vernal pool area. This could also be accomplished by eliminating field #1, thus, returning to the type of configuration (but with much more sensitive placement) shown in EXHIBIT B-2 (p. 5). Alt. 2 would have considerable overflow parking. The paved parking area should probably be reduced to 400 cars to preserve open space and save money. Even with ample overflow parking B/21

Draft EIR Comments, Appendix 1
page 2

- P. 11 & 12 (Cont.) there would be room for a lighted soccer field southwest of the softball fields if a 500 ft pluss width is created between Haggin Oaks Golf Course and Business 80 by the relatively easy relocation of the fairway for hole #13 into a 400 ft. wide swath of unirrigated rough. The best place for a soccer field would be behind the Auburn Blvd.-Business 80 onramp as this would be well away from freeway noise and pollution. The positioning of natural habitat features on EXHIBIT B-4 is deplorably bad and must be corrected. The access route must be updated to the city's current topographically precise maps of the area east of the Sacramento Horseman's Association. (Steve Talley for ACRP) B/24
Con
- EXHIBIT B-5 (Alt. 3) should also receive accurate updates respecting position of the access route (the Nov. 21, 1984 route should be used) and natural habitat features. This plan could be made more environmentally sensitive by moving the parking lot to the south of the fields and running the access route parallel to the Business 80 right of way. Alternatively two 200 car lots could be put at either end. In either case there is sufficient space for overflow parking at the southwest end of the complex. City staff should seriously try to upgrade the quality of this plan as along these guidelines. The only real disadvantage is that space for a soccer field would not be available. (Steve Talley for ACRP) B/25
- p. 15 Section C, SUMMARY OF FINDINGS, Project Description. Again, the project description gives the intolerable implication that natural habitat is somehow going to fare well under a project that has potentially devastating impacts in store for both natural habitat and open space. If Jones, Stokes, and Associates must adopt some form of the City's terminology it should be done with the clear understanding that the conceptual designs for the athletic complex, day use recreation, and neighborhood park developments will be put in the approximate center of the three remaining open space-natural habitat areas within the boundaries of the existing Master Plan. This placement actually renders the damage to natural habitat and open space much more severe than the actual development acreages would suggest. (Steve Talley for ACRP) C/3
- p. 15 & 16. Alternatives. Descriptions of alternatives should be revised to reflect the City of Sacramento's best maps and conceptual plans. (Steve Talley for ACRP) C/4
- p. 16 Impacts and Mitigation Measures. The Impact and Mitigation Table is long and difficult to understand and this problem will remain even when it is upgraded. This subsection is the best place to put an approximate half page narrative of what each project would do, and whether or not mitigation is possible. (Steve Talley for ACRP) C/5

S. N. Talley
28 Nov 1984

S. N. Talley
28 Nov 1984

p. 16 Cumulative Impacts. This section should summarize the real cumulative adverse impact of the Del Paso Master Plan and surrounding commercial developments. These impacts include the loss of natural habitat (particularly for raptors and small mammals) which will derive from construction of the Stanford Home for Children and the athletic complex, parking lot(s), access route, day use recreation area, and neighborhood park. Irreplaceable loss of the last remnants of lowland oak riparian, terrace, and upland plant communities must also be addressed. These problems should be summarized the summary should not refer to the section in the text where the discussion is found in full! The summary should refer to the full text (as revised) respecting the fact that there is suitable mitigation for these cumulative impacts. (Steve Talley for ACRP) C/6

p. 17 Irreversible Environmental Changes. All the facilities are relatively permanent and this section should take note of this fact. (Steve Talley for ACRP) C/7

p. 17 The arguments made against the athletic complex in the Draft EIR also pertain to the day use recreation area and neighborhood park. (Steve Talley for ACRP) C/6

p. 18 IMPACT AND MITIGATION SUMMARY TABLE, Project Description. Proposed Improvements. A separate category should be created for parking lots. The Day Use Recreation Area and Neighborhood Parks should also be treated separately. Together these developments would consume 19 acres of natural habitat within Del Paso Regional Park. They rank in significance of impacts with the athletic complex. The EIR summary table should clearly indicate this. The descriptions for the various project components will need to be updated to reflect the City's current plans. (Steve Talley for ACRP) B/26

Need for Project. The City of Sacramento must define a need for the developments proposed for Del Paso Park east of Watt Ave. No need is listed in the summary table. (Steve Talley for ACRP) B/27

p. 18 IMPACT AND SUMMARY TABLE, Land Use, Consistency with Land Use Policies. The Arcade Creek Restoration Project mitigation package as summarized in our Nov. 14, 1984 correspondence would provide mitigation for a sensitively placed athletic complex and combined day use recreation and neighborhood park. Admittedly the Plan 1 layout and separate day use recreation and neighborhood parks would be destructive beyond feasible mitigation. (Steve Talley for ACRP) P/37

p. 19 IMPACT SUMMARY TABLE, Land Use Conflicts, Impact, Sports Complex. The impact of noise upon golfers is mentioned. What about the noise from the complex 1 parking lot disturbing nature area users along the creek or in what little would remain of the terrace oak woodland-savanna under this plan? (Steve Talley for ACRP) D/38

S.N. Talley
28 Nov 1984

p. 19 IMPACT SUMMARY TABLE, Land Use Conflicts, Impact, Other Improvements. Positioning the neighborhood park within the terrace east of Norris Swale would do more than destroy oak reproduction. Developing the six acres within the twelve acre terrace would significantly degrade this future oak woodland-savanna and prevent the eventual formation of an approximate 45 acre natural habitat area in the park east of Watt Ave. D/39

Significance. We find the above a "Significant Adverse Impact" and recommend Jones and Stokes and Assoc. reassess their "Potentially Significant" finding.

Mitigation: Since the entire terrace east of Norris Swale is a potential oak regeneration area, any development within the area would degrade natural habitat values. We believe the neighborhood park should be removed from the terrace east of Norris Swale and that the planned facilities can be included in a combined day use recreation and neighborhood park west of Norris Swale. Moreover, the terrace east of Norris Swale is quite far from parking. (Steve Talley for ACRP)

GENERAL COMMENT: We also need to recognize that by just protecting young oak trees and developing areas with little or no trees we are selectively removing oak savanna as a future component of park vegetation. Since oak woodland and savanna was once the dominant vegetation within the region we find this action inappropriate. Open areas must also be preserved if we are to retain representative samples of the ecosystem itself. (Steve Talley for ACRP) F/42

Mitigation, golf ball hazards to softball players and cars on roads. Why not suggest redesigning the eastern end of golf course to lessen potential hazards. The large amount of unmove rough and low topography of the area render this economically feasible. If a fast growing (usually exotic) vegetation is used to form a barrier the primary attention should still be given to placement and care of native vegetation to form a permanent barrier. Landscaping with native vegetation is an important component of the overall mitigation package for the softball complex. (Steve Talley for ACRP) D/40

20. Impact, elimination of soccer fields, Sports Complex-2. The soccer field would not have to be eliminated if fairway #13 of Haggin Oaks Golf Course was moved 200 ft into a 400 ft rough area separating it from fairway #14. This could be accomplished even if the softball fields were set further south than is shown in EXHIBIT B-4. (Steve Talley for ACRP) D/41

p. 21 Impact, Reduced parking with Sports Complex-3. We do not find the smaller paved-landscaped parking facility used with this proposal a disadvantage as long as access is provided. D/42

Steven N. Talley
28 Nov 1984

- p. 21 Impact, Complex-3 parking. (Cont.) to overflow parking at the southwest end of the facility. The need for more than 400 parking spaces will be only occasional and overflow parking is the sensible way to accommodate such peak crowds. This same argument applies to Sports Complex-2. Since parking for Sports Complex-1 is located in an ecologically sensitive area no argument except the one for no project would mitigate its impacts. (Steve Talley for ACRP) D/47 cont D/49

GENERAL COMMENT: The only real disadvantage of Sports Complex-3 is that there would not be sufficient room for a soccer field. Mitigation for this impact upon a growing sport would be to allow for a slightly larger combined neighborhood and day use recreation park west of Norris Swale. so a soccer field could be located there without impacting other activities at this location. (Steve Talley for ACRP) D/44

- p. 22 Vegetation and Wildlife, Vegetation, Vernal Pools, Sports Complex-2. Sensitive placement of softball fields or a return to a three field complex like that shown in EXHIBIT B-2 (but with sensitive placement) would preserve at least the largest vernal pool in the "main" northern vernal pool area. The loss of the vernal pool habitat from its last significant area in Del Paso Park is viewed as a significant adverse impact irrespective of the current presence or absence of endangered species. (Steve Talley for ACRP) F/43

Vernal Pools, Sports Complex-3. The small southern vernal pool does possess Psilocarphus sp. which is only found in the largest northern pool where it is very rare. Other, possibly endangered, species could be there too. If complex-3 is selected this area could be put inside an enclosure and species of special concern introduced to one or several of the northern pools. The difference in species composition between northern and southern pools is suggestive of catastrophic selection. (Steve Talley for ACRP) F/44

Access Roads A, B, C. Comments should be revised to fit current designs. Access route A should be labeled as inducing significantly adverse impact because it would bisect the Arcade Creek terrace west of Watt Ave. if it was not attached to a parking lot which removes the terrace ecosystem altogether. (Steve Talley for ACRP) F/45

Other Improvements, Impact. The entire terrace area on either side of Norris Swale is a potential oak regeneration area. When it becomes permissible to develop areas where oaks are not currently present we prevent future regeneration and/or exclude oak savanna from the future park vegetation. The best mitigation measure is to leave one terrace natural and develop the other one. (Steve Talley for ACRP) F/46

Steven W. Talley
28 Nov 1984

- p. 22 Vegetation and Wildlife, Vegetation, Oak regeneration. Impact.

Sports Complex-1. Development of the parking lot would destroy the largest oak regeneration area in our region. High terrace oak woodland-savannas are quite rare. Those which also possess young oaks are even rarer. The parking lot for complex-1 would obliterate this asset and thereby trigger a significantly adverse impact. (Steve Talley for ACRP) F/47

Sports Complex-2 would, indeed, prevent destruction of the oak regeneration area. We strenuously object to the use of the term beneficial as the sports complex itself would still have adverse impacts. Significance ratings for oaks respecting athletic complexes 2 & 3 should read: "less than significant". There have been only two "beneficial" suggestions made in the Del Paso Park environmental process that we know of. These suggestions are to rehabilitate the vernal pools and to restore critical wildlife habitat within the denuded rough areas in Haggin Oaks Golf Course. To date none of these suggestions are contained in the EIR. (Steve Talley for ACRP) F/49 F/4

Access Routes A, B, C. These need to be updated to the new design criteria. Access route A would bisect the Arcade Creek terrace and thereby destroy the ecological integrity of this "core area" of natural assets. This is a significant adverse impact for which no mitigation would be possible except to change the route to plan B or C. (Steve Talley for ACRP) B/28

Access Route B should be revised to conform to the design presented by the city at the Draft EIR Hearing. (Steve Talley for ACRP) B/29

Access Route C should be revised to conform with the alignment set forth on Nov. 21, 1984 by Parks and Community Services. If the route goes west of the large heritage blue oak near Watt Ave. it will impact a significant oak reproduction area. This impact is potentially significant. Mitigation is to go behind the tree but this will require very innovative planning. The critical factor is the loss of ecological integrity on the terrace if the road goes west of the terrace. (Steve Talley for ACRP) B/30

- p. 22 Impacts on large oak trees.

Sports Complex-1. The large heritage oaks within the proposed parking area would be subject to two to four foot cut and fill. These trees are so large that preserving 1 1/2 times the diameter of their dripline would render the parking area impractical to design. Bringing the parking lot closer to these trees would seriously threaten them. This would be a serious adverse impact and mitigation is not possible. (Steve Talley for ACRP) F/49

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28 Nov 1984

p. 22 Impacts on large oak trees (Cont.)

Sports Complex-2. Large oak trees would be avoided except for the blue oak in the upland savanna. This tree could be saved by innovative planning of the softball complex or going to a three field design. Impact is not "beneficial" it is less than significant. (Steve Talley for ACRP) C/10

Other Improvements. Large oak trees on the terrace just east of Renfree Field would be retained but they would be removed from their natural community. Impact would be potentially significant but could be mitigated to less than significant with well planned native landscaping in the park itself. (Steve Talley for ACRP) C/11

p. 22 Degradation of adjacent natural habitat.

Sports Complex-1. Without provision for overflow parking and with placement of the parking lot within the core natural area of Del Paso Park destruction of neighboring ecosystems is inevitable. Impact would be significant and adverse. No mitigation would be possible except to change the project to one of the alternatives. (Steve Talley for ACRP) B/31

Sports Complex-2. The proposal put forth by the city at the Nov. 14, 1984 Draft EIR hearings is still too close to the terrace. Impacts would be potentially significant, but could be mitigated by a high cyclone fence. This in turn would have adverse aesthetic impacts. The best mitigation would be to move the complex further to the south which would also permit preservation of at least the largest vernal pool. (Steve Talley for ACRP) F/50

Sports Complex-3 would be well removed from the terrace and vernal pool ecosystems. Its impacts would be less than significant. (Steve Talley for ACRP) F/51

Access Route A. Even without the parking lot on the terrace this route would bisect the ecosystem that exists there. This impact would be at least potentially significant. (Steve Talley for ACRP) F/52

Access Route B. This route (Nov. 14, 1984 conceptual plan) avoids the creek except to cross at a relatively degraded area. It would also avoid the terrace. It would impose adverse impacts upon the Sacramento Horseman's Association which could be mitigated. Overall significance: less than significant. (Steve Talley for ACRP) F/53 D/45

Access Route C. This route would potentially allow disruption of the ecological integrity of the terrace west of Watt Ave. This impact is at least potentially significant. The notes about the large blue oak tree made in the text under this heading could be placed under the heading for impacts on large trees. If the access route goes east of this tree extensive and innovative mitigation measures will be necessary to protect this largest blue oak in the park. (Steve Talley for ACRP) C/12

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28 Nov 1984

p. 23 Degradation of adjacent natural habitat.

Other improvements. Placing a day use recreation and neighborhood park, respectively, into the centers of the terraces west and east of Norris Swale would substantially increase human impacts on what natural habitat area remained. This is a significant adverse impact. Mitigation would be to concentrate active uses on the larger (20 acre) terrace just east of Renfree Field and leave the other terrace as natural habitat. This would substantially decrease the boundary length between active and passive areas to the benefit of the latter. (Steve Talley for ACRP) D/46

p. 23 Wildlife, Impact Sports Complex-1. This plan would place a parking facility in one of the most sensitive raptor and small mammal foraging areas of the park. This is a significant adverse impact for which no mitigation is available within the scope of Plan 1. (Steve Talley for ACRP) F/54

Sports Complex-2. The location would indeed result in less impact than complex one. However, impacts would still be significant because of the area consumed (valuable for raptors and small mammals) for the complex itself. It would be at least potentially significant. Mitigation would be to place the complex as far south as possible. (Steve Talley for ACRP) C/13

Sports Complex-3. Even this complex will remove valuable raptor and small mammal foraging area. Mitigation for this project and Complex-2 is possible and has been outlined in our Nov. 14, 1984 correspondence by S. N. Talley. (Steve Talley for ACRP) C/14

Access Route A. Even without a parking lot on the terrace this route would endanger small game on the terrace. Larger mammals and raptors would be drawn to these carcasses extending the danger to the parks more sensitive wildlife. Significant adverse impact. (Steve Talley for ACRP) F/55

Access Route B. Would pose a danger to wildlife but would probably not be as serious as Route A. Impact? potentially significant. (Steve Talley for ACRP) C/15

Access Route C. As revised on Nov. 21, 1984 this route would pose some problems. The south abutment of the bridge would be tempting for animals to cross which spend the day in the riparian zone and forage on the terrace at night. Some sort of deflecting mechanism should be used to keep them in the riparian corridor until they are west of the bridge. By following the alignment for Watt Ave. the access route would probably follow the outer boundaries of territories of larger mammals which have long adjusted to the presence to busy roads nearby. The impact would probably be potentially significant. (Steve Talley for ACRP) F/56

Steve N. Talley
28 Nov 1984

p. 137 Section O, CUMULATIVE IMPACTS, Setting and Impacts.

The Cumulative Impacts section appears to miss the point altogether. We are not concerned about just the projects outside Del Paso Park (EXHIBITS O-1, O-2). Although the Stanford Home for Children will remove significant habitat for small mammals and raptors, we are also concerned with the developments within Del Paso Park whose impacts are individually significant or potentially significant and cumulatively very significant and adverse to humans, plants and wildlife. This must be addressed in the Final EIR.
(Steve Talley for ACRP)

Mitigation. Despite the intensity of individual and cumulative impacts of development within and about Del Paso Regional Park mitigation measures are available to substantially reduce the negative effects upon open space and natural habitat. We have considered this problem in detail and refer you to pages 2-8 of the Arcade Creed Restoration Projects Nov. 14, 1984 correspondence. Jone, Stokes, and Associates are invited to incorporate this mitigation package into their EIR as mitigation for cumulative impacts.
(Steve Talley for ACRP)

Steven N. Talley
28 Nov 1984



Environmental Council of Sacramento, Inc.

November 28, 1984

Planning and Development Committee
Sacramento, California

Honorable Members in Session:

SUBJECT: Draft EIR for Del Paso Regional Park Master Plan Implementation Program

The Environmental Council of Sacramento (ECOS) has serious concerns about the adequacy of the above mentioned report.

State policy, as established by the California Environmental Quality Act (CEQA), precludes approval of a proposed project if there are feasible alternatives or feasible mitigation measures available which would lessen the environmental effects of the project. CEQA also requires that an environmental report must contain comments obtained as a result of consultation and states that comments obtained from reasonable experts cannot simply be ignored but must be addressed with a good faith reasonable response. CEQA further requires that a new report must be drafted if new information is known.
(Steven Talley for ECOS)

Steven Talley, Ph.D. and Tim Vendlinski from the Arcade Creek Restoration Project (ACRP) are qualified experts within the meaning of CEQA. Their proposed alternative comments and mitigation measures are documented in their correspondence with the Department of Parks and Community Development which is also included as an attachment to the November 19, 1984 staff report to you. In addition to these very detailed comments, experts from the California Native Plant Society, Audubon Society, Sierra Club and ECOS have presented supporting and supplemental information to the Department.
(Steven Talley for ECOS)

These comments must be responded to. They simply cannot be ignored. The proposed project, if implemented, will cause irreversible environmental harm. The alternatives and mitigation measures presented by the ACRP and other qualified experts would reduce the environmental damage caused by the project as proposed. The Environmental Council of Sacramento is opposed to the three alternatives proposed in the Draft EIR and instead supports, in concept, the alternative proposed by the ACRP.
(Steven Talley for ECOS)

Member Organizations

American Lung
Association of
Sacramento —
Emigrant Trails
Audubon Society
California Native
Plant Society,
Sacramento
Valley Chapter
California Park and
Recreation
Society, District 11
Capital Bicycle
Commuters
Association
League of Women Voters
of Sacramento
Modern Transit Society of
Sacramento
Planned Parenthood
Association of
Sacramento
Sacramento County
Farm Bureau
Sacramento Old City
Association
Sacramento Valley
Bicycle Advocates
Save the American River
Association
Sierra Club, Mother Lode
Chapter
South Natamas
Community
Association
Zero Population Growth

We would normally request that you reject the Draft EIR at this time because it fails to comply with CEQA. Instead we request that you direct the Environmental Assessment Team to fully respond to the comments they have received from the ACRP and others. In the interim ECOS will continue to work with staff from the Department of Parks and Community Development in the hopes that we will reach an amicable solution that will preserve the rare habitats in Del Paso Regional Park.

Sincerely,

Steven Cates

Steven Cates, Secretary
Environmental Council of Sacramento



Sacramento Audubon Society
c/o Alta Tura 4633 Q Sacramento CA 95819

Re: Del Paso Regional Park Master Plan Draft EIR
Comments presented 11-28-84 to Sacramento Planning
and Community Development Committee.

Sacramento Audubon Society supports the efforts of the Arcade Creek Restoration Project. At the national level, Audubon has made a strong commitment to save habitat and protect rare, unusual or characteristic natural areas. The Sacramento Audubon chapter has a responsibility to press national conservation goals in our area and to back groups like the Arcade Creek Restoration Project within the limits of our resources. At the local level, Sacramento Audubon has its own special interest in Arcade Creek. It has long been used by our chapter as a convenient area to lead bird watching field trips. It is especially valuable for beginners because of the diversity of bird species that can be found there. (Alta Tura for Sacramento Audubon Society)

F/59

Arcade Creek has been sadly neglected over the years. Certain segments of the trails suffer severe erosion and are often impassable in winter. Off-road vehicles have found their way in to compound the erosion problem and destroy the natural beauty. Neglect has been mostly good for wildlife. Development and loss of habitat are their worst enemies. But, decent trails would allow more people to enjoy the natural areas of Arcade Creek.

The draft EIR mentions the adverse effects of the proposed new bridge over Arcade Creek. It indicates that the adverse effect will be loss of vegetation. The worst portions of the trails are those that pass under the existing bridges. Yet there is no mention of the increased erosion and degradation of the trails where they will be crossed by the new bridge. Since there is no mention of the problem, there is no mitigation measure suggested either. We believe that trail stabilization under the new bridge and under the existing bridges would be reasonable mitigation for this severe problem of accessibility. We ask that the final EIR consider the problem of trail erosion. At minimum, trails should be mapped, trouble spots identified, and an analysis made of the condition of trails under the existing bridges. That analysis should be applied to a discussion of the new bridge's impact on the trails. Effective methods of trail stabilization should be included in mitigation measures. (Alta Tura for Sacramento Audubon Society)

D/47

In our review of the draft EIR, we were discouraged to see such a long discussion of how one of the projects would be financed and sustained, and no discussion of how the other projects were to be financed. We would like to see equal attention paid to the means by which each of the proposed projects is to be created and maintained. We would especially like to see effort go into plans to finance the mitigation and protective measures that are necessary to justify any of the proposed developments. (Alta Tura for Sacramento Audubon Society)

B/35

Sacramento Audubon would like to underline all of the many carefully considered, environmentally sound recommendations and corrections that the Arcade Creek Restoration Project has advanced to Jones and Stokes and to the City. We are looking forward to a much improved Arcade Creek and would like to offer our organization's assistance to anyone else who is working for a protected and enhanced Del Paso Park Nature Area. (Alta Tura for Sacramento Audubon Society)

A/7

Thank you

Alta Tura


Alta Tura
Conservation Chair

DEL PASO REGIONAL PARK MASTER PLAN

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

I would like to see a post and cable system incorporated into the plan that separates the sports complex from the natural area. D/48
This fencing system should also be put along the access road to separate the roadway from the bicycle lane. (Douglas Shaw) I am in favor of Access Road 3, but it needs some modifications. The first curve on Access Road 3 lacks good visibility, which could cause many accidents. I B/36
propose that the first turn should be slightly re-routed to make it straighter. The blind curve could also be improved by cutting back any obstructing vegetation that lies near the curve. The use of speed bumps (gentle-sloping type) could help prevent accidents on any of the three access road alternatives. (Douglas Shaw)

The Draft Environmental Impact Report suggests that the vernal pools must be saved, only if endangered plant species are found in the pools in spring 1985. All four of the vernal pools must be saved regardless if the pools do, or do not contain endangered plants. The planning policy under the 1984 City Master Plan states "Identify and acquire sites containing significant native plant communities, or examples of ecological relationships to make the area available for public visitation, education, and recreational use". (Douglas Shaw) F/60

 Douglas G. Shaw
2610 Notre Dame Drive
Sacramento, CA 95826

Sincerely,
Douglas G. Shaw
Douglas G. Shaw
California State University at Sacramento student
Sacramento Audubon Society

2610 Notre Dame Drive
Sacramento 95826



**COUNTY OF SACRAMENTO
AIR POLLUTION CONTROL DISTRICT**

NORM COVELL
AIR POLLUTION CONTROL OFFICER
9223 Tech Center Drive, Suite 800
Sacramento, California 95826
(916) 366-2107

November 26, 1984

CITY OF SACRAMENTO

DECEMBER 1984

Robert P. Thomas, Director
Parks & Community Services
3520 Fifth Avenue
Sacramento, CA 95817

DEPARTMENT OF
COMMUNITY SERVICES

Subject: DRAFT EIR, DEL PASO REGIONAL PARK MASTER PLAN

Dear Mr. Thomas:

Thank you for the opportunity to review the subject DEIR. In my opinion, the document is complete and adequately identifies potential air quality and traffic related impacts that would result from any of the proposed project alternatives.

The expansion of the park to include a sports complex and increased natural habitat areas, along with greater mixed use, will in the long term be of significant benefit to the Sacramento Metropolitan Area. A regional park located within the urban area will in future years allow for shorter trip lengths for park users, who would be required to drive much further distances to other regional facilities. Secondly, a well designed and maintained park is vitally needed by residents of the north central urban area, and may encourage greater use of bicycles by park users with attendant air quality and traffic congestion benefits. (Sacramento County Air Pollution Control District)

If you have any questions regarding my comments and enthusiasm for the proposed park plan, please call me at 366-2107.

Very truly yours,

Norm Covell
NORM COVELL
Air Pollution Control Officer

HC:jb



GREATER SACRAMENTO SOFTBALL ASSOCIATION

Metropolitan Sacramento

4623 T Street
Sacramento, California 95819
(916) 449-5500

December 1, 1984

RON RADIGONDA
Commissioner

CAROL GUNNARSON
Deputy Commissioner

IAN KERNAN
Youth Commissioner

STAN FINGERUT
Umpire-in-Chief

ROSE SIMONSON
Player Representative

GILL GUBEL
Deputy UIC

Mr. Robert P. Thomas
Department of Parks and Community Services
3520 5th Avenue
Sacramento, Ca. 95817

Subject: DRAFT EIR, DEL PASO REGIONAL PARK MASTER PLAN

Dear Mr. Thomas,

I am writing this letter in support of the development of a softball complex at the Del Paso Regional Park.

I have reviewed the draft EIR and I feel that the environmental impact raised in the report can be mitigated. It was apparent at the City Council Committee Meeting that some individuals disagreed with the draft EIR, and with the preliminary plans for the development of the softball complex. I recognize that these individuals have valid concerns that need be addressed. However, these issues and concerns can be rectified if the following measures are taken:

1. Placement of access road.

The overlay that was displayed on plan #3 at the City Council Committee Meeting addresses the concerns of the Horsemen's Association by avoiding the clubhouse area. It also avoids the majority of the regenerating oaks that are a concern of the environmental groups. (Ron Radigonda for Greater Sacramento Softball Association)

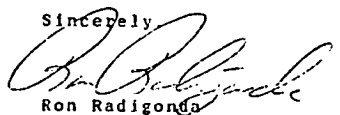
2. Vegetation

As outlined in the draft EIR the mitigation measures for the impact on the regenerating oaks is to locate the softball fields as drawn on plan #2. This plan also maintains the 4 - diamond, wheel configuration which is the best alternative for conducting softball leagues and tournaments. (Ron Radigonda for Greater Sacramento Softball Association)

Although the vernal pools have environmental significance, their existence is man made. If the existing vernal pools cannot be avoided, they could be relocated into an interpretive area of the park. (Ron Radigonda for Greater Sacramento Softball Association)

In conclusion, I feel that the major issues regarding the environmental concerns can be resolved by using a composite of the three plans, and by using the overlay access road illustrated on plan #3 at the City Council Committee Meeting. (Ron Radigonda for Greater Sacramento Softball Association)
On behalf of the 30,000 plus softball participants in the Sacramento area, thank you for the opportunity to express an opinion, from the sports perspective, on the Del Paso Regional Park draft EIR.

Sincerely,


Ron Radigonda
Commissioner

EXLOG

EXPLORATION
LOGGING
INC.

P.O. Box 214676
Sacramento, California
95821 U.S.A.

Phone: (916) 920-1900
Telex: 377444
Cable: EXLOGG

December 3, 1984

Ms. Barbara E. Bonebrake
Department of Parks and Community Services
3520 Fifth Avenue
Sacramento, CA 95817

Dear Ms. Bonebrake:

After having reviewed the Environmental Impact Report for the Del Paso Regional Park, I would like to address two areas of concern regarding the traffic flow on Longview Drive.

The present plan depicts traffic volume increases primarily after 5:15 p.m., Monday through Friday, with the majority of the traffic heading toward the park area. Although the figure predicted for the traffic increase may be totally correct, it is my contention that summer daytime traffic has not been properly considered, nor has the traffic from the air base during peak periods, including lunch hour. All this traffic will pose a safety problem for employees working in any of the businesses on Longview Drive. (Larry Patterson for Exploration Logging, Inc.)

Secondly, because of this increase in vehicles, I would recommend that the access road be placed in the vicinity of Industry Road, a distance away from the businesses, thereby reducing the possibility of traffic stopping dead in the roadway waiting to make a turn into the park and causing a hazard to all other traffic. (Larry Patterson for Exploration Logging, Inc.)

Sincerely,


Larry Patterson
Security Specialist
EXPLORATION LOGGING, INC.

LP:bf

A Baker
International
Company

Rec'd 12/4

SACRAMENTO
HORSEMEN'S
ASSOCIATION

3200 LONGVIEW DRIVE NORTH HIGHLANDS, CA 95660

December 5, 1984

Department of Parks and Community Services
3520 Fifth Avenue
Sacramento, California 95817

Atten: Barbara E. Bonebrake

Re: Draft EIR for Del Paso Regional Park
Master Plan

In view of Sacramento's expressed commitment to "maintaining the natural or native environment for low-intensity uses designed to ensure long-term protection", I feel that the development of a sports complex in Del Paso Regional Park would be a disservice to the community and is inconsistent with stated policy. Such a high-intensity use development not only destroys the natural environment upon which it is situated, but detracts from the beauty and enjoyment of surrounding park areas as well. (Doris Urch for Sacramento Horsemen's Association) 0151

While locating a sports complex in a park does not enhance the games played there in any way, the presence of a sports complex in a park environment, with its attendant congestion, noise, automobile traffic, exhaust fumes, and litter can only detract immeasurably from the public's enjoyment of the surrounding park facilities. I believe the general public's concept of a park is a place where one can walk, jog, ride horseback, picnic, or just plain relax in an atmosphere of natural beauty, as far removed as possible from population pressure, and the aforementioned congestion, noise, traffic, etc. (Doris Urch for Sacramento Horsemen's Association) 0152

In the interests of serving the general public in the best possible way, as well as maintaining Sacramento's integrity, I urge that all park development be consistent with your stated policy of low-intensity uses in a natural or native environment.

Very truly yours,

Doris C. Urch

Doris C. Urch
Former President, 1974, Sacramento
Horsemen's Association
4440 Reycraft Drive
Sacramento, CA 95841
Telephone: 483-0600

Rec'd 12/5/84

STATE OF CALIFORNIA—RESOURCES AGENCY
DEPARTMENT OF BOATING AND WATERWAYS
1629 S STREET
SACRAMENTO, CALIFORNIA 95814
(916) 445-6731

GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF BOATING AND WATERWAYS

December 5, 1984
CITY OF SACRAMENTO

DECEMBER 5, 1984

DEPARTMENT OF
COMMUNITY SERVICES

Mr. Robert P. Thomas, Director
Parks and Community Services
Dept. of Parks and Community Services
3520 Fifth Avenue
Sacramento, CA 95817

Dear Mr. Thomas:

Del Paso Regional Park Master Plan

The Department of Boating and Waterways is not a regulatory agency and therefore does not issue permits of any kind. However, we do review and may comment upon U.S. Corps of Engineer public notices for proposed projects which are subject to that federal agency's jurisdiction. We review and may comment on environmental documents which are submitted to us by the State Clearinghouse. For review purposes on both environmental documents and Corps public notices, the Department's interests lie in the following areas:

1. Potential for navigation hazards - to what extent might the proposed project affect safe navigation in California's waterways? (Department of Boating and Waterways) 0153
2. Beach erosion - to what extent might the proposed project affect the stability of coastal as well as inland beaches? (Department of Boating and Waterways) 0154
3. Boating and boating facilities - to what extent might the proposed project affect existing or planned small craft harbors, launching facilities, and other boating facilities? To what extent might recreational boating activities be affected? (Department of Boating and Waterways) 0155

If you have further questions concerning our role in project review processes, please contact Barbara Kierbow of our Environmental Unit at (916) 323-9488.

Sincerely,

William H. Ivers

WILLIAM H. IVERS
Director

cc: State Clearinghouse

Rec'd 12/6/84



GREATER SACRAMENTO SOFTBALL ASSOCIATION

Metropolitan Sacramento

4620 T Street
Sacramento, California 95819
(916) 449-5500

December 6, 1984

RON RADOGONDA
Commissioner

CATHY GUNNARSON
Youth Commissioner

DAVE EMMETT
Youth Council Chair

STAN FINGERUT
Umpire-in-Chief

ROSE SIMSON
Player Representative

BILL GUBEL
Deputy UIC

Robert P. Thomas, Director
Department of Parks and Community Services
3520 Fifth Avenue
Sacramento, CA 95817

SUBJECT: EIR Draft for Del Paso Regional Park

Dear Mr. Thomas:

On behalf of the Greater Sacramento Softball Officials Association and its over 400 members, we would like to make the following comments regarding the EIR Draft for Del Paso Regional Park.

The purpose of regional parks is to provide diversified recreational opportunities such as softball, golf, picnicking, hiking, and horse-back riding. (William Gubel for Greater Sacramento Softball Association) | 0156

The Draft EIR points out that the proposed project is inconsistent with the City's plan to maintain a natural environment; however, we feel the total project should include a balance of recreational needs of Sacramento residents as well as protecting portions of the natural areas of the park. The access road should be placed in the least destructive area to meet environmental needs. (William Gubel for Greater Sacramento Softball Association) | 0157
Thank you for the opportunity to comment on the draft.

Sincerely,

William Gubel

WILLIAM GUBEL
Deputy Umpire in Chief

WG:js



GOLDEN SENIORS SOFTBALL CLUB

A Non-Profit Organization

December 6, 1984

Robert P. Thomas, Director
Parks and Community Services
3520 Fifth Avenue
Sacramento, CA 95817

SUBJECT: Draft EIR, Del Paso Regional Park

Dear Mr. Thomas:

The Golden Seniors Softball Club is pleased to have the opportunity to be able to review the Draft EIR study regarding Del Paso Regional Park.

The softball complex is needed in the Sacramento metropolitan area and should remain high on the priority list for Del Paso Regional Park. (Deni Treaster for Golden Seniors Softball Club) | 0158

We support the project and understand the need for a buffer zone between the softball complex and the park's natural area and feel that your Department has made a conscientious effort to keep the natural area intact as well as meet our needs for a softball facility. (Deni Treaster for Golden Seniors Softball Club) | 0159

Sincerely,

Deni Treaster

DENI TREASTER
Golden Seniors Softball Club

DT:js

SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento, CA 95813; (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

Mr. Thomas

-2-

December 4, 1984

December 4, 1984

ROBERT THOMAS, DIRECTOR
PARKS AND COMMUNITY SERVICES
CITY OF SACRAMENTO
3520 FIFTH AVENUE
SACRAMENTO, CA 95817

CITY OF SACRAMENTO

DECEMBER 1984

DEPARTMENT OF
COMMUNITY SERVICES

Dear Robert:

The Sacramento Municipal Utility District (SMUD) has received and reviewed the DRAFT EIR for the Del Paso Regional Park Master Plan.

The SMUD infrastructure is already in place to serve this development. The proposed sports complex for this project will be located under an existing 69kV transmission line. Any relocating or undergrounding of this 69kV line will be done at the expense of the developing party. The City or the developers should contact the District's Distribution Planning Department for the cost estimates on the removal and relocation of the 69kV transmission line. The specialist for the planning areas where the Del Paso Plan is located is Lamar Hinds. You can contact him at 732-5789. (SMUD)

The District's Conservation staff has specifically recommended the following measures:

- 1) Energy efficient high-pressure sodium lighting installed where appropriate. (SMUD)
- 2) Four recommendations for management controls:
 - a) Remote control capabilities to assure timely and proper operation.
 - b) Photocells installed in conjunction with remote controls
 - c) Controls are to be located in secure areas
 - d) Multi-level switching to provide various levels of lighting in response to different types of events (SMUD)

The SMUD Conservation staff is available to discuss these measures.

Uses of the area northeast of Watt Avenue must be watched as we have a 230kV underground transmission line through the area paralleling Auburn Boulevard. No structures should be placed within the easement, excavations must be monitored and trees should not be planted in or too near the easement. (SMUD)

On page 124 and 125 this 69kV line is referred to as a 16,000 volt line. (SMUD)

Thank you for the opportunity to comment.

Paul Olmstead
Paul Olmstead
Environmental Specialist

cc: Barbra Bonebrake

Mr. Robert P. Thomas, Director
Parks & Community Services
City of Sacramento
3520 Fifth Ave
Sacramento, CA 95817

Dec. 6, 1984

CITY OF SACRAMENTO
DEC 10 1984
DEPARTMENT OF
COMMUNITY SERVICES

Mr. Thomas

REF. LETTER DATED NOV. 26, 1984 FROM THE
SACRAMENTO HORSEMEN'S ASSOCIATION.

I AM IN COMPLETE SUPPORT OF MR. /D/65
JOHN JONES LETTER. (Greg McMurray for
Sacramento Horseman's Association)

ATTACHED LETTER

SINCERELY
Peggy McMurray

OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO, CA 95814



December 6, 1984

Barbara Bonebrake
City of Sacramento
3520 Fifth Avenue
Sacramento, CA. 95817

Subject: Del Paso Regional Park Master Plan Implementation Program, SCH #84091704

Dear Ms. Bonebrake:

The State Clearinghouse submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is closed and the comments of the individual agency(ies) is(are) attached. If you would like to discuss their concerns and recommendations, please contact the staff from the appropriate agency(ies).

When preparing the final EIR, you must include all comments and responses (CEQA Guidelines, Section 15132). The certified EIR must be considered in the decision-making process for the project. In addition, we urge you to respond directly to the commenting agency(ies) by writing to them, including the State Clearinghouse number on all correspondence.

In the event that the project is approved without adequate mitigation of significant effects, the lead agency must make written findings for each significant effect and must support its actions with a written statement of overriding considerations for each unmitigated significant effect (CEQA Guidelines Section 15091 and 15093).

If the project requires discretionary approval from any state agency, the Notice of Determination must be filed with the Secretary for Resources, as well as with the County Clerk. Please contact Peggy Osborn at (916) 445-0613 if you have any question about the environmental review process. (State Clearinghouse)

Sincerely,

John B. Ohanian
John B. Ohanian
Chief Deputy Director

cc: Resources Agency
attachment

Memorandum

To: Terry Roberts, Manager
State Clearinghouse Unit, Room 121
Office of Resources, Energy,
and Permit Assistance
1400 Tenth Street
Sacramento, CA 95814

Date: November 30, 1984

File:

From: DEPARTMENT OF TRANSPORTATION
DIVISION OF AERONAUTICS

Subject: Del Paso Regional Park Master Plan Implementation Program -
City of Sacramento - SCH #84091704

The Department of Transportation, Division of Aeronautics, has reviewed the above-referenced document with respect to those areas germane to its statutory responsibilities. Those areas include the impact of noise and safety from an airport on the project, the project's impact on an airport itself, and the compatibility of adjacent land uses in the vicinity of an airport. Said document appears to address all of the issues of concern to this Division, and there are no additional comments to add at this time. (Department of Transportation)

Thank you for the opportunity of reviewing and commenting on this proposal.

JACK D. KEMMERLY, Chief
Division of Aeronautics

Sandy Hanson for
Earl R. Tucker, Chief
Air Transportation

RECEIVED
DEC 4 1984
State Clearinghouse

December 5, 1984

Mr. Robert P. Thomas, Director
Parks & Community Services
City of Sacramento
3520 5th Avenue
Sacramento, California 95817

CITY OF SACRAMENTO

DEC 7 1984

DEPARTMENT OF
COMMUNITY SERVICES

Dear Mr. Thomas:

As a member of the Board of Directors of the Sacramento Horsemen's Association, I would like to comment on the EIR submitted to you for the Del Paso Regional Park.

First of all, I think that I express the sentiment of most of the members of SHA who feel that any access route to the softball diamonds which crosses the Arcade Creek from Longview Drive will be a detriment to the natural area which exists there now and will invariably cause problems for the many people on horses who ride the bridle trails along Arcade Creek every day. If a bridge is built across the creek, it could be a barrier to those using the trails if it is not constructed properly. It will cause more erosion of the creek bank because high waters will be funneled through a narrower opening. (Stan Oppengard for Sacramento Horsemen's Association) D/66

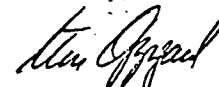
I strongly support Mr. John Jones's letter to you dated November 26, 1984 and would also like to emphasize that the EIR did not mention the impact of air pollution, noise pollution, light and glare and other problems which will impact on the Sacramento Horsemen's Association. I feel that the Sacramento Horsemen's Association was completely ignored in the report. (Stan Oppengard for Sacramento Horsemen's Association) D/67

This proposed facility, if an access road is built across Arcade Creek, will have a very negative impact on the many people who value the rural nature of the Arcade Creek area and who enjoy it every day. (Stan Oppengard for Sacramento Horsemen's Association) D/69

I would urge you to strongly consider relocating the access road so it will not cross Arcade Creek. It would permanently damage an area that is unique in our urban setting. (Stan Oppengard for Sacramento Horsemen's Association) B/37

Thank you for considering my comments.

Sincerely,



Stan Oppengard
801 Morse Avenue
Sacramento, California 95825

Arcade Creek Restoration Project
4130 Wheat St.
Sacramento, CA 95821
(916) 487-3244

APPENDIX 2

ARCADE CREEK RESTORATION PROJECT

CORRESPONDENCE

FOR THE

DEL PASO REGIONAL PARK MASTER PLAN IMPLIMENTATION

NOP HEARING, OCT. 8, 1984

SUBMITTED

BY

STEVEN N. TALLEY, Ph.D.

NOTE: Only those portions which are enclosed within boxes require comments. Other materials have either been rendered obsolete by subsequent investigation or have been already dealt with in the EIR.

Steve Talley
Steve Talley

October 4, 1984

Environmental Assessment Team
Del Paso Regional Park Master Plan
Department of Parks and Community Services
3520 Fifth Ave.
Sacramento, CA 95817

Dear Sir/Madame:

We are dismayed with the contradictions and inaccuracies contained within the Notice of Preparation for the Del Paso Regional Park Master Plan Draft EIR. Most notably, the Project Description (Attachment A) describes a 26 acre athletic complex consisting of three lighted softball fields, a lighted soccer field and supporting structures. If this is so why does the Sports Complex Conceptual Site Plan (Figure 2) show four softball fields and no soccer field. We ask "What type of athletic complex does the city really want to build?"

The Arcade Creek Restoration Project supports an athletic complex with four softball fields. We believe an even number of fields is best because this would allow tournament play where winners and losers are successively paired. We also believe a soccer field should be located within Del Paso Park if provision is not being made for this facility in a nearby park. With careful planning a soccer field could be added to the neighborhood park east of Renfree Field. (Steve Talley for ACAR)

Whereas the Arcade Creek Restoration Project supports the same or greater scope of athletic complex as that described in the Del Paso Park Master Plan, the conceptual site plan (1) offered by the Department of Parks and Community Services is completely insensitive to the natural area resources which have almost miraculously persisted up to the present in the area between Business 80 and Haggin Oaks Golf Course. Remnants of all three major ecosystems which typified the Sacramento area a century ago still persist here: riparian forest dominated by valley and interior live oak, old creek

INS

INS

10/70

F/63

terraces which support oak woodlands and savanna with all three species of native oaks (valley, interior live, and blue oaks) and upland blue oak woodland and savanna. At least some of the blue oak savannas on the Del Paso Park uplands once possessed vernal pools as local areas still support seasonal ponding and vernal pool species. (Steve Talley for ACRP)

The Nature Conservancy reports riparian forest in California is now restricted to one tenth of one percent of its pristine range. The California Department of Water Resources has also demonstrated riparian forest in the Sacramento Valley which is dominated by valley oak is declining at a faster rate than other types. Nearly all of the old alluvial terraces were cleared for agriculture long ago due to their fertile loam soils and low risk of flooding. It is unusual to find a creek terrace on the valley floor with substantial tree cover remaining and even rarer that such an area possesses abundant oak reproduction. Significant non-riparian oak regeneration has not occurred in rural areas since the 1880's implying California's oak-covered hills may be greatly reduced in the future. The history within Del Paso Park has obviously been different from these rural areas as our uplands contain abundant reproduction of oaks. (Steve Talley for ACRP)

One of the best non-riparian oak reproduction areas within Del Paso Park is about the large heritage oaks along the southern boundary of the Arcade Creek terrace west of Watt Avenue. Just west of these trees are the vernal pools. These are large pools whose present configuration has resulted from past disturbance related to the development of Haggin Oaks Golf Course. But the underlying soil, which has permitted the existence of these pools was not man made. A small relict vernal pool in the field northwest of the Auburn Blvd/I-80 onramp suggests these unique ecosystems may have been widespread in the upland blue oak savanna of Del Paso Park. (Steve Talley for ACRP)

Any two or three of these botanical assets: intact riparian oak forest, regenerating oak woodland on a large creek terrace, regenerating blue oak savanna on uplands, vernal pools would constitute an important natural area on the floor of the Sacramento Valley. In Del Paso Park all four elements occur within an approximate 40 acre area. Moreover, the area is only 5 minutes of walking time from the Sacramento Science Center and Junior Museum which has a major commitment to teach nature appreciation. Anyone who attended Joseph Cornell's childrens nature appreciation seminar last winter will realize the value of these unique natural assets. (Steve Talley for ACRP)

The sports complex conceptual site plan offered by the Sacramento Department of Parks and Community Services would decimate this cluster of natural area values. All but the northwestern fourth of the regenerating terrace oak woodland-savanna would be lost to gain little more than parking space. Heritage oaks would either be left surrounded by parking lots or irrigated lawn both of which are usually fatal. Their reproduction, the heritage oaks of the future, would be bulldozed away. The vernal pools and thier upland blue oak savanna watershed would be lost completely.

Too much is already known about the rarity of riparian oak forest and the absolute rarity of regenerating oak woodland to permit sacrifice of these natural elements to gain parking space when there is ample room for parking in the annual grassland to the southwest of the proposed facility. We strongly urge the Department of Parks and Community Services to abandon the sports complex-1 conceptual site plan. (Steve Talley for ACRP)

The sports complex-2 site plan demonstrates we can have a centralized athletic facility without destroying the regenerating oak woodland and savanna on the Arcade Creek terrace or destroying/degrading the heritage oaks on the terrace-upland ecotone. This can be accomplished by moving one fairway (#13) of Haggin Oaks Golf Course into an approximate 400 ft. wide swath of rough separating it from fairway #14. The athletic complex is then shifted several hundred feet to the southwest and the parking facility located on the south instead of north side of the cluster of softball fields. A second access route has been proposed which would leave Longview Drive opposite from Industry Drive, parallel the eastern margin of the Sacramento Horseman's Association, cross Arcade Creek and enter the west side of the athletic complex. Since the Parks and Community Services sketch of this plan is rather vague we have submitted our own concept of how this plan could be implemented (Figure 1).

Whereas building sports complex-2 would save the Arcade Creek terrace west of Watt Avenue, all but the westernmost vernal pool and all of the blue oak savanna watershed for the vernal pools would be lost. Blue oak savanna, once the most widespread plant community within Del Paso Park, is now the most restricted community. Vernal pools are now so limited we are not sure of their original distribution. Moreover, the lights, noise, and traffic resulting from sports complex-2 would almost certainly render the surviving terrace and floodplain vegetation in this area a precarious habitat for the

larger wildlife inhabiting the park. Nevertheless, we believe the sports complex-2 site plan could be made environmentally sound if these losses were mitigated through additions of natural habitat not already included in the master plan for the Del Paso Regional Park.

Despite its small size, partial loss of the original blue oak cover, and recent encroachment by industrial development on city park land, the blue oak savanna north of Longview Drive still provides the best example within Del Paso Regional Park of the two tiered oak-grass community which typified the Sacramento region less than a half century ago. Blue oaks have become established here within the last twenty years despite widespread establishment failure of this species in rural area throughout the past century. This region is extensively patrolled by raptors, it is a nesting area for game birds (quail, grouse, pheasant), and is probably important for nighttime foraging by animals like grey fox which seek shelter within the dense riparian vegetation along Arcade Creek during the day. Creating a natural habitat area here would mitigate for the physical loss of restorable blue oak savanna resulting from construction of the sports complex-2 plan. (Steve Talley for ACRP)

The grassland east of Norris Swale appears to have been the site of a well developed oak woodland. Copious oak regeneration in this area today probably heralds the natural reestablishment of this woodland after years of plowing and mowing. If this area was granted natural habitat status and added to the natural habitat areas along and north of Arcade Creek which have already been designated in the Master Plan an approximate 45 acre shelter for wildlife would eventually develop in this area. We believe this "East Del Paso Natural Area" could mitigate for the degradation of wildlife values on the floodplain and terrace area just north of sports complex-2. (Steve Talley for ACRP)

Should the Department of Parks and Community Services not accept our mitigation proposal for the sports complex-2 site plan, we would still support sports complex-3 as it meets every environmental concern we have thus far brought to the attention of Parks and Community Services. The small but prime area of regenerating blue oak savanna along Longview Drive east of the Sacramento Horseman's Association would be preserved. The riparian corridor forest would be moderately disturbed but this is the most plentiful natural plant community in the park today. All of the regenerating oak woodland and most of the

oak savanna on the Arcade Creek terrace and heritage oak areas would be preserved. The vernal pools and a representative area of their oak savanna watershed would also be preserved.

We believe sports complex-3 could be made more attractive if a second parking lot was added in the grassland corridor between Haggin Oaks Golf Course and Business 80. We also believe this type of sports complex layout would be compatible with the access route proposed with the sports complex-2 plan. We are sensitive to the concerns of Parks and Community Services that the layout of sports complex-3 would mean too much walking for some people to get to restrooms and the concession stand and that the latter could depress the facilities revenue producing potential. We are willing to show this concern by agreeing to the design set forth in sports complex-2 provided the resulting environmental degradation is mitigated by preservation and restoration of natural habitat areas elsewhere in Del Paso Regional Park.

In summary, we would emphasize the Arcade Creek Restoration Project supports construction of an athletic complex containing at least four softball fields and, hopefully, a soccer field within the Del Paso Regional Park. However, our enthusiasm to build the sports facilities is tempered by knowledge of the rarity of regenerating oak woodland and savanna in the Sacramento Valley. We cannot believe the Parks and Community Services Department would seriously contemplate sacrificing these rare and beautiful resources to obtain little more than a parking lot! We are grateful to the city's own planners for demonstrating we can have both a centralized athletic complex and the natural area resources on the Arcade Creek terrace west of Watt Avenue. We urge the City of Sacramento to drop the sports complex-1 (and any similar) proposal immediately and to concentrate their efforts and those of their consultants on refining and mitigating the sports complex-2 proposal.

Sincerely,

Timothy Vendlinski
Coordinator, Arcade Creek
Restoration Project
Steven N. Talley
Steven N. Talley, Ph.D.
Plant Ecologist

Arcade Creek Restoration Project
4130 Wheat Street
Sacramento, CA 95821

October 15, 1984

Environmental Assessment Team
Del Paso Regional Park Master Plan
Department of Parks and Community Services
3520 Fifth Street
Sacramento, CA 95817

Dear Sir/Madame:

The Arcade Creek Restoration Project has explained in their Oct. 4, 1984 correspondence how the City of Sacramento's sports complex-1 proposal for the Del Paso Regional Park would destroy the cluster of natural area values within and about the Arcade Creek terrace just west of Watt Avenue. We then demonstrated there is sufficient land on the gently sloping uplands south of this terrace to locate a centralized athletic complex containing four softball fields, ample parking, and a rest-room and concession area. We called attention to the fact that the access route for this facility could avoid degrading the Arcade Creek terrace by leaving Longview Drive opposite from Industry Drive, traversing the eastern margin of the Sacramento Horseman's Association and entering the athletic complex east of hole #13 of Haggin Oaks Golf Course.

We subsequently noted that whereas this "sports complex-2" proposal would permit the Arcade Creek terrace (the prime botanical asset within the park) to remain intact it would still result in significant degradation of natural area values about the terrace. The most notable loss would be the degradation of wildlife values within the largest remaining natural habitat area in Del Paso Park. Additional losses would be the removal of a large area of restorable blue oak savanna (Oak savanna, once the most widespread plant community within Del Paso Park, is now the most restricted community.) and the loss of the largest and least disturbed vernal pools. (see Figure 1 of our Oct. 4 correspondence).

We thoughtfully assessed these problems and determined the loss of restorable blue oak savanna could be mitigated through preservation of existing examples of this plant community on

Environmental Assessment Team
Page 2

city-owned land north of Longview Drive. Moreover, the loss of critical wildlife habitat could be mitigated by adding the field east of Morris Swale to natural habitat lands already designated around this area by the Master Plan. This would produce a tract comprising approximately 45 acres which would eventually revegetate and provide a critical wildlife area. We then endorsed the sports complex-2 conceptual site plan under the strict provision that these two environmental mitigation measures would be adopted in the Del Paso Regional Park Master Plan. On October 8, 1984, Arcade Creek Restoration Project personnel were pleased with the unanimous community support for the mitigated sports complex-2 site plan, a plan which would give our community a national tournament quality softball complex and preserve in perpetuity an irreplaceable example of our natural heritage.

In the remainder of this correspondence the Arcade Creek Restoration Project will refine the sports complex-2 site plan. We will demonstrate that the sports complex-2 plan can be adapted to an access route off of Longview Drive which is opposite of either Airport or Industry Drive and that neither route needs to disrupt the Arcade Creek terrace west of Watt Avenue. We will show the city's proposal to add a picnic area along the northern boundary of the athletic complex-2 site plan would substantially enhance the public enjoyment of both the athletic complex and natural area, and that the picnic area concept remains valid with either an Airport Drive or Industry Drive access route. Moreover, we will use the recently completed topographic survey for the area between Business I-80 and Haggin Oaks Golf Course to provide specific examples of how a centralized athletic complex using either of the former-tioned access routes can be located in the uplands east of Haggin Oaks Golf Course without damaging the creek terrace, the largest and least disturbed vernal pools, or moving the fairway for hole #13 of the golf course. Finally, we will examine the cut and fill requirements for the two sports complex-2 site plans and the City of Sacramento's sports complex-1 plan. These data will reveal the softball complex and particularly the parking area for complex-1 would require more earth movement than their counterparts in the sports complex-2 site plans.

Athletic Complex: The playing fields for the sports complex-1 (City of Sacramento) and sports complex 2A or 2B (Arcade Creek Restoration Project) conceptual site plans would utilize the same general open field area between Haggin Oaks Golf Course and Business I-80 (Figure 1). The principle difference between the sports complex-1 versus 2A or 2B site plans is that the former would possess an approximate 200 ft wide north and central aisle whereas all aisles of the sports complex 2 proposals would

be 100 ft wide. The sports complex 2B site plan differs from the 2A plan by having the athletic fields set back from the Business 1-80 right of way an additional 90 ft to accommodate an access route between the playing fields and interstate highway.

We are not surprised that the amount of cut and fill needed to build all three sports complex proposals would be substantially reduced if the southern pair of fields is graded to an elevation three or four feet higher than the northern pair of fields (Table 1). The changes in elevation would be absorbed within the bleacher areas and aisles between the southern and northern pair of fields. The amount of cut and fill needed for the sports complex-1 proposal would be greater than for the 2A or 2B proposals because fields #3 and 4 would extend further into the vernal pool depressions ~~and~~ because of the wider aisles (Table 1). (Steve Talley for ACRP)

The sports complex 2A or 2B plans would allow the two largest and least disturbed vernal pools to be saved and would allow sufficient annual grassland between softball field #3 and the heritage oak area to landscape a vernal pool watershed to replace the current watershed which will become the athletic complex. Since the soils southeast of the largest vernal pool (pool #1) are not likely to be different from the vernal pool area, a feasibility study to restore vernal pools in this area should also be commissioned. Whether or not vernal pools can be restored to the area north of field #3 a buffer drainage system should be created to deflect summer irrigation runoff from the athletic complex away from the vernal pools. Soil to produce this buffer and to landscape a new vernal pool watershed would come from the excavation excess produced by grading the athletic complex site (Table 1). (Steve Talley for ACRP)

The placement of a parking lot on the north side of the sports complex-1 layout would mean the largest vernal pool would be under about four feet of fill. (Pool #1 is on the mall between the parking lot and athletic complex in this plan.) Even if pool #2 could be saved it would have lost virtually all of its watershed and would be subject to inundation by irrigation water during summer. (Figure 1).

Picnic-Playground Area: The picnic-playground area in the sports complex 2A or 2B proposals would be highly scenic. In either case they would be on a rise with the proposed natural area on their north, west, and east boundaries. The golf course and athletic complex would be beyond their southwest and south boundaries, respectively (Figures 2 & 3). The picnic-playground areas for the sports complex 2A and 2B proposals would have their own modest parking areas and they would be enclosed by a cyclone fence. A gate in the fence would remain open allowing access to the natural area during the majority of the time when softball

tournaments were not underway. During tournaments the gate would remain closed to facilitate the city's effort to collect admission and protect the natural area from unusually heavy human impact. The small separate parking lot for the picnic area would assist people with walking impairments, those with small children or loads (ice chests etc.). The separate parking area with access to a significant natural area would make the picnic-playground area a natural place for week-end or after noon family gatherings or as a meeting area for groups visiting the natural area. (Steve Talley for ACRP)

The picnic area for the sports complex-1 plan would have a large parking lot along its eastern margin and little or no natural area. If provision has been made for protecting the few natural habitat areas remaining about the picnic area or for a children's playground they are not evident in the city's conceptual drawing.

Access Route: The access route for the sports complex 2A plan would leave Longview Drive opposite Industry Drive, traverse the uplands along the eastern margin of the Sacramento Horseman's Association, and enter the sports complex and picnic-playground area just north of the green for hole #15 in Haggin Oaks Golf Course. This access route would, thus, stay away from the Arcade Creek terrace west of Watt Ave. - an area of regenerating oak woodland and savanna and the principle botanical asset in Del Paso Park. (Figure 2, inset). (Steve Talley for ACRP)

An access route opposite Industry Drive would adversely impact the Sacramento Horseman's Association by coming within approximately 20 ft of their clubhouse, taking out the eastern 12 to 15 ft of an arena, and a small circular corral. We suggest the city sponsor the following mitigation for these impacts: the clubhouse should be relocated immediately to the northwest, the Horseman's Association lease should be expanded to include the uplands between Arcade Creek and Longview Drive they have long needed for overflow parking, the arena and corral should be rebuilt on a suitable site, and more and better parking areas developed on the association grounds. (Steve Talley for ACRP)

The Arcade Creek Restoration Project believes the Horseman's Association would be better off if the athletic complex access route went along their eastern boundary and the forementioned mitigation measures were adopted. However, we acknowledge the long-standing presence of the Horseman's Association in Del Paso Park and realize they are almost entirely responsible for the trail system that we all use and enjoy. If there is strong sentiment within the Horseman's Association to simply "leave things the way they are" we will respect this position. Toward this end we have developed a specific site plan which would utilize an access route off of Longview Drive which would be opposite of Airport Drive. (Airport Drive is approximately 700 ft east of the Horseman's

Association.) This route would avoid crossing the Arcade Creek terrace west of Watt Ave. by running parallel to Longview Drive east toward Watt Ave., cross Arcade Creek utilizing a curve with an approximate 300 ft radius, and then run parallel to the Watt Ave. and Business I-80 right of way to the athletic complex. A spur road would extend along the northern margin of the softball fields to the picnic-playground area (Figure 3). (Steve Talley for ACRP)

An obvious adverse impact of the sports complex 2B access route is that it would bring a paved road within ten ft of the base of the large heritage blue oak (50" dbh) just north of the proposed toll booth. Since the toll booth just south of this tree is on a moderate rise the road under the tree will probably require a shallow fill in which case damage to the tree's root system is likely to be minimal. The large drooping limbs on the south side of this tree's crown could probably be saved with skillful pruning - a professional arborist should be consulted. We also note that whereas the complex 2B access route could damage the 50" dbh blue oak the configuration of the softball fields would permit the select blue oak (23" dbh) in the oak savanna area to be saved. It would be in the aisle between fields 3 and 4 in an area where the cut and fill could be less than one foot. Another positive aspect of the sports complex 2B plan is that the picnic-playground area would not be adjacent to the main access route. This would provide greater safety for children and reduce the amount of noise and air pollution in the picnic-playground area during softball tournaments. (Steve Talley for ACRP)

Parking: We do not understand why the city's planners selected the Arcade Creek terrace for the sports complex-1 parking lot. If the same two foot incremental drop between the southern and northern pairs of softball fields suggested for sports complex-2A was adapted to the complex-1 plan the 200 ft wide mall opening to the parking lot would be at about 69 ft elevation. This would mean a four foot drop from the athletic facility to the upper margin of the parking lot if the latter was graded to take advantage of the existing average elevation and slope gradients of the Arcade Creek terrace. (In this case the parking lot would be about 66, 64, 60, and 61 ft elevation, respectively, at its SE, SW, NW, and NE corners.) (Figure 1). (Steve Talley for ACRP)

If the complex-1 parking lot was graded to be more or less even sloping, cuts of up to four feet would be made into the rise immediately west of the large heritage valley oak (dbh 57"). Four foot cuts would also have to be made just SSW of the large heritage blue oak (50" dbh) near the Watt Ave.-Business I-80 onramp. The third largest oak on the Arcade Creek terrace (a 46" dbh blue oak) would be in the center of an approximate 400 by 250 ft elliptical fill area which would be about 2 1/2 ft deep about the tree's base. This fill would also cover the most

significant examples of blue oak reproduction remaining in Del Paso Park (Figure 1). (Steve Talley for ACRP)

The proposed access route from the parking lot to Longview Drive does not align with Airport Drive unless the parking area is to be even larger than the one shown in the city's conceptual drawing. We acknowledge there is little traffic on Airport Drive due to its dead end at the I-80 right of way. Nevertheless, we believe it would be safer to plan the access route opposite an existing intersection rather than create an entirely new intersection. If the sports complex access was opposite Airport Drive it would have to cross Arcade Creek and then curve to enter the sports complex-1 parking lot. (Steve Talley for ACRP)

Additional problems with the sports complex-1 parking lot are the lack of overflow parking areas and the damming of a swale along the parking lot's southeastern margin. Without provision for overflow parking we believe the scraps of original terrace vegetation remaining along the western and northeastern boundaries of the parking lot would become de facto overflow parking areas. To avoid seasonal ponding along the southeastern margin of the parking area a ditch or culvert would probably have to be dug adjacent to the large (50" dbh) blue oak - the same oak that would experience four foot cuts along its southwestern margin! (Steve Talley for ACRP)

By placing the parking facility on the north side of the athletic complex, soccer players and spectators would have to walk over 1,000 ft to get to the playing field. Without access to the extensive unused lands between Business I-80 and Haggins Oaks Golf Course these lands will not be able to function as public park land (Figure 1, inset). (Steve Talley for ACRP)

The parking lot for sports complex 2A and 2B splits into three drainages which flow onto Haggins Oaks Golf Course. Topographic gradients in the open field south of the athletic complex are modest. The area can probably be graded to an even slope with an approximate one foot cut centered about the 75 ft contour line running southwest of softball field #2. This material would primarily be deposited immediately to the southeast along the Business I-80 right of way. Another smaller cut and fill would be necessary at the extreme southern end of the paved parking area (Figure 1). (Steve Talley for ACRP)

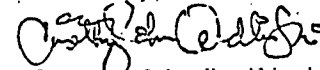
The sports complex 2A or B parking lot will have an extensive overflow parking area in the annual grassland to the southwest between Business I-80 and Haggins Oaks Golf Course. Again we emphasize the sports complex-1 proposal would not provide overflow parking. (Steve Talley for ACRP)

In summary the Arcade Creek Restoration Project prefers the sports complex-2A site plan with the environmental mitigation outlined in our October 4, 1984 correspondence. We would accept the sports complex-2B plan with the same mitigation if an acceptable mitigation package cannot be negotiated with the Horseman's Association regarding the effect of the plan 2A access route. We reiterate from our Oct. 4th correspondence that the parking and access routes presented by the City of Sacramento in the sports complex-1 site plan are totally insensitive to the exceptional natural area elements on the Arcade Creek terrace west of Watt Ave. This plan is, thus, unacceptable to the Arcade Creek Restoration Project. The sharpness of this conflict is underscored by the fact that not a single speaker at the October 8, 1984 Del Paso Regional Park Master Plan NOP Hearing endorsed the city's sports complex-1 plan. Conversely, support for the sports complex-2 conceptual plan with environmental mitigation was unanimous among the those speakers whose testimony focused on one of the three athletic complex conceptual plans discussed at the hearing.

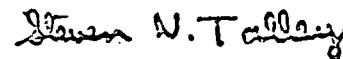
We acknowledge working hard to convince the environmental community that it was indeed possible to mitigate for placing a sports complex (let alone a centralized sports complex) in the largest undeveloped parcel remaining within Del Paso Park. We understand this effort was successful only because our plan provided for well thought out mitigation, respecting the loss of blue oak woodland and savanna and critical wildlife habitat resulting from the sports complex. In truth we selected the blue oak woodland and savanna and the creation of the East Del Paso Natural Area as acceptable mitigation for a centralized athletic complex because of the real ecological values they represent and because these areas could be preserved with little or no real loss to non-natural area features proposed for the regional park in the master plan. We understand from personal communication with the director of Parks and Community Services that the area north of Longview Drive is being contemplated for sale or lease to commercial developers. The retention of at least the better oak woodland and savanna stands as natural area would not have any long term impacts upon park land available to the citizens of the Sacramento Metropolitan Area for non-natural area purposes. The large open field east of Renfree Field is sufficient to accommodate both a day use recreation area and a neighborhood park. This would be especially true if the city elects to move fairway #13 of Haggin Oaks Golf Course. The latter action would create sufficient land for a soccer field and an expanded parking facility and still have room for overflow parking in the area south of sports complex 2A or 2B.

The most unusual feature of Del Paso Regional Park is that it can be developed as a multipurpose facility and still retain its significant natural area assets. If development is proposed without the environmental mitigation discussed in this letter and our October 4th correspondence, significant natural area elements will be lost. Without mitigation we also understand the local and regional support for the sports complex -2 conceptual plan will dissipate - probably to be replaced by litigious opposition.

Sincerely,



Timothy John Vendlinski
Coordinator, Arcade Creek
Restoration Project



Steven N. Talley, Ph.D.
Plant Ecologist

FIGURE 1

SPORTS COMPLEX PLANS

- PLAN 1 (CITY OF SACRAMENTO)
- PLAN 2A (ACRP)
- PLAN 2B (ACRP)

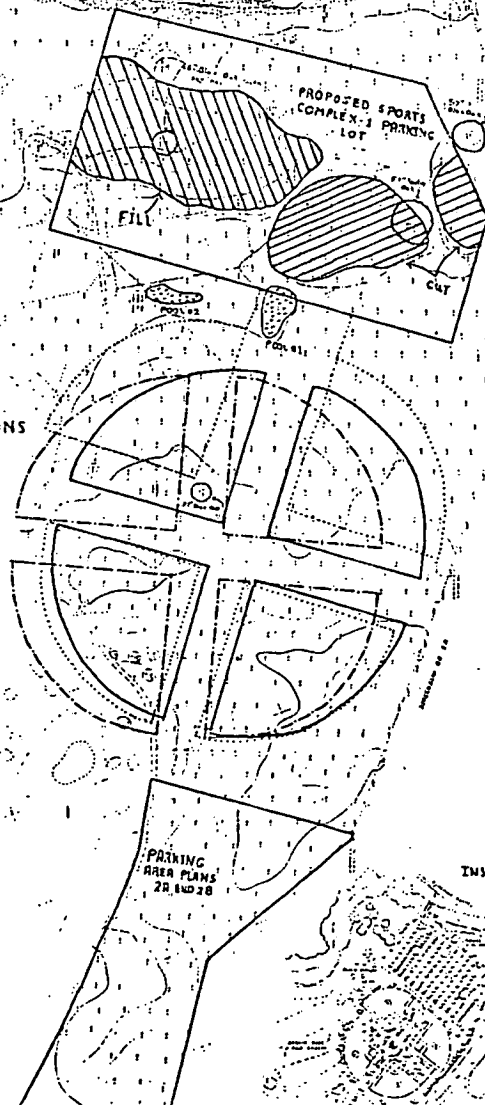
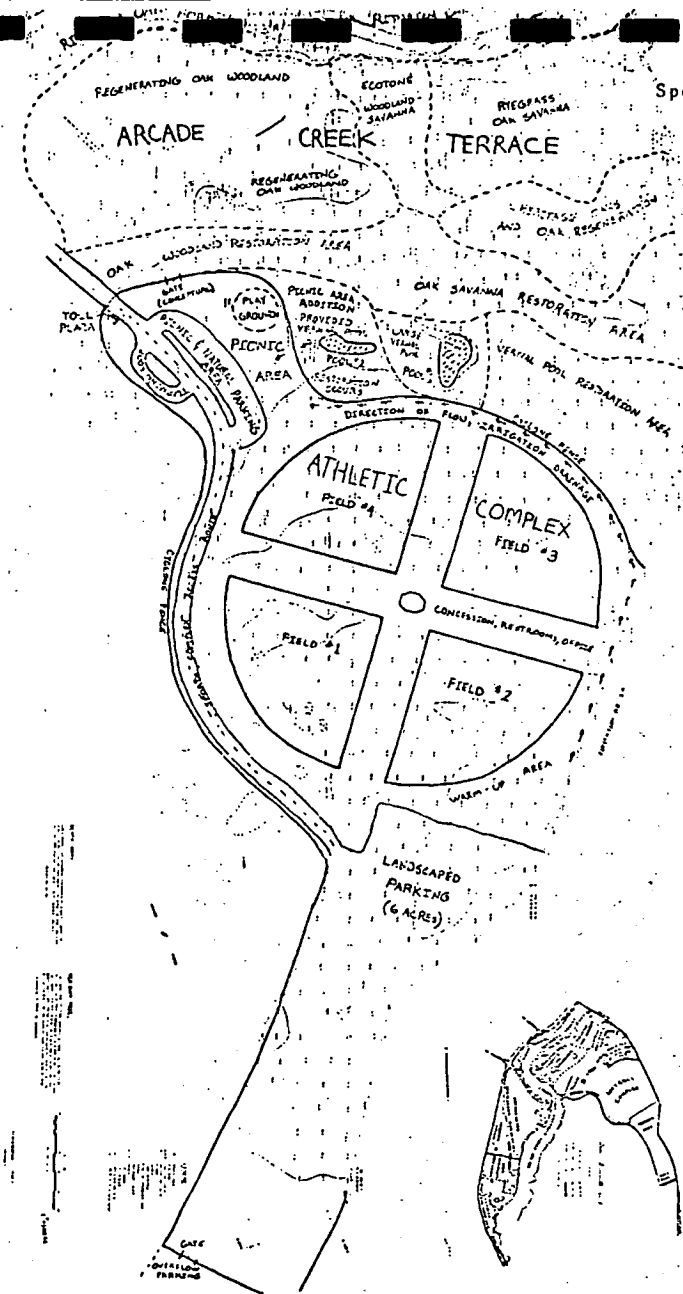


FIGURE 2.

Sports Complex



Oral Comments not Submitted in Writing

Joel Hessing (President, Greater Sacramento Softball Association)
In favor of increasing outdoor recreation opportunities in Sacramento area.

D/86

Ann Taylor (Member, Sacramento Horsemen's Association)
Wanted to comment on the historical significance of horsemen in Sacramento. The grant was made by Haggin to the City of Sacramento 80 years ago with the understanding that it would be used for recreational purposes. Horse trails were to be a part of the recreational uses. These trails have been encroached upon by every development within Del Paso Park.

N/5

The trails have fallen into disrepair during the last 3-4 years due to limited funds. There are 80,000 horses in Sacramento and vicinity (including Yolo and Placer Counties), so horsemen are a large interest group.

D/67

Access Road C with the overlay is the favored alternative because it is shorter and as a result will be less expensive. This alternative will also eliminate the need for providing a buffer between the golf course and the access road.

D/83

A bridle trail bordered on both sides by barriers is not favored because this would not allow riders to use the open space within the park.

D/49

Rose Stinson (Player Representative, Amateur Softball Association)

The location of the proposed complex is a plus because out of town players can be housed in nearby motels. Lodging has been a problem for other locally held national tournaments. Tournaments can generate revenue for Sacramento area merchants.

D/90

The environmental concerns are understandable and can hopefully be mitigated.

D/91

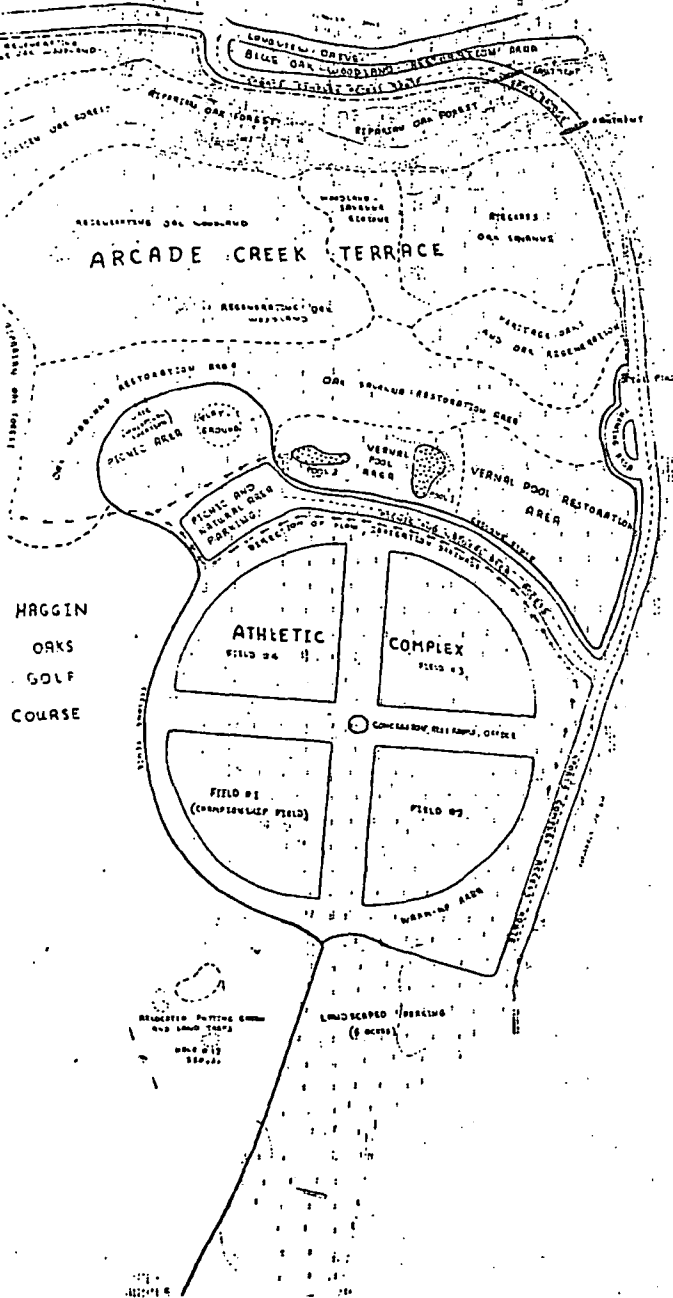
Jim Trumbly

I was involved in writing native Oaks Our Valley Heritage, parts of which are included in the Appendix of the DEIR. There is a lot of new information available about protecting oaks when developing around them. I am helping in the process of updating the book and am available for consultation about the Del Paso project.

D/92

The method used to analyze the impacts of the access road in the DEIR should be changed. The access routes are analyzed in relationship to specific sports complex and parking lot alternatives. The problem with this method is that each access alternative could be combined with any of the three sports complex alternatives.

D/93



There are some inaccuracies in the DEIR, most of which are found on page 22. The third impact of Sports Complex 1 listed under the Vegetation section of the Summary Table should be changed to read: Large oak trees would be retained, but may suffer high mortality even if special precautions are taken. The significance of the third impact of Sports Complex 2 should be changed from Beneficial to Less than Significant because nothing beneficial is being proposed. The third impact of Sports Complex 3 should be changed to read: It appears from the conceptual drawing that this alternative would avoid impacts to the large oak trees.

C/16

A good mitigation measure to implement during construction, to prevent compaction by heavy equipment or storage of heavy construction materials, is to install fencing 40 feet out from the dripline of oaks that are to be retained.

F/70

This project gives us the opportunity to save a regenerating oak area which may lead to a large number of oaks in the park one day. I am not in favor of the Sports Complex 1 design because the regenerating oak area is covered by the parking lot. The fact that the City has declared 1985 The Year of the Oak also seems significant.

F/71

Gene Robinson (City Park Superintendent)

I made a personal inspection of the area where the "vernal pools" are supposedly located. There are two areas where water is currently standing near the proposed sports complex site. There is one depression on top of the hill west of the sports complex site which was formed due to the dumping of gravel in this area. The area south of the existing tree nursery where soil was excavated to make terraces for planting rows of trees also has standing water. This man-made area is what the vernal pool controversy is based on.

F/72

Dennis McQuen (Arcade Creek Restoration Project)

The question of whether the vernal pools are manmade or not is irrelevant. The climate and soil are the factors that have allowed the vernal pools to form. Vernal pools are rare in the Sacramento Valley and should be protected in Del Paso Park.

F/73